

DRAFT EIR

RESPONSES TO COMMENTS

RTC



Lake Merced West Project

520 John Muir Drive

San Francisco Planning

Case No. **2019-014146ENV**

State Clearinghouse No. 2021060231

	<i>Draft EIR Publication Date:</i>	February 23, 2022
	<i>Draft EIR Public Hearing Date:</i>	March 31, 2022
	<i>Draft EIR Public Comment Period:</i>	February 23, 2022 to April 11, 2022
	<i>Responses to Comments Publication Date:</i>	December 20, 2022
	<i>Final EIR Certification Hearing Date:</i>	January 12, 2023



San Francisco
Planning



MEMORANDUM

Date: December 20, 2022
Case No.: **2019-014146ENV**
Project Title: **Lake Merced West Project**
To: Members of the Planning Commission and Interested Parties
From: Lisa Gibson, Environmental Review Officer
Re: Responses to Comments on Draft Environmental Impact Report for Lake Merced West Project

Attached for your review please find a copy of the Responses to Comments document for the Draft Environmental Impact Report (EIR) for the above-referenced project. **This document, along with the Draft EIR, will be before the planning commission for Final EIR certification on January 12, 2023.** The planning commission will receive public testimony on the Final EIR certification at the January 12th hearing. Please note that the public review period for the draft EIR ended on April 11, 2022; any comments received after that date, including any comments provided orally or in writing at the final EIR certification hearing, may not be responded to in writing.

The planning commission does not conduct a hearing to receive comments on the responses to comments document, and no such hearing is required by the California Environmental Quality Act. Interested parties, however, may always write to commission members or to the president of the commission at commissions.secretary@sfgov.org (preferred) or 49 South Van Ness Avenue and express an opinion on the responses to comments document, or the commission's decision to certify the completion of the Final EIR for this project.

Please note that the responses to comments document in addition to the draft EIR is the final EIR. If you have any questions concerning the responses to comments document or the environmental review process, please contact Julie Moore at CPC.LakeMercedWestEIR@sfgov.org or at 628.652.7566.

Thank you for your interest in this project and your consideration of this matter.

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CHAPTER 7

INTRODUCTION TO THE RESPONSES TO COMMENTS

7.1 Purpose of the Responses to Comments Document

The purpose of this Responses to Comments document is to present comments on the draft environmental impact report (EIR) for the proposed Lake Merced West Project (project), to respond in writing to comments on environmental issues, and to revise the draft EIR as necessary to provide additional clarity. Comments were made in written form during the public review period, which extended from February 23, 2022, to April 11, 2022, and as oral testimony at a public hearing on the draft EIR held on March 31, 2022 by the San Francisco Planning Commission (planning commission). All written comments, presented in their entirety, and a complete transcript of proceedings from the public hearing on the draft EIR are included in this responses to comments document. A list of all commenters is provided in Chapter 9, List of Persons Commenting.

Pursuant to the California Environmental Quality Act¹ (CEQA), sections 21091(d)(2)(A) and 21091(d)(2)(B), the San Francisco Planning Department (planning department) has considered the comments received on the draft EIR, evaluated the issues raised, and prepared written responses that fully address each substantive physical environmental issue that has been raised. CEQA Guidelines section 15088 requires the lead agency to evaluate all public comments received on the draft EIR, identify comments that raise significant environmental issues, and present a good-faith, reasoned analysis in a written response to those comments. *Significant effect on the environment* means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project. Economic or social changes alone are not considered a significant effect on the environment.² As further stated in CEQA Guidelines section 15088(c), the level of detail in the response may correspond to the level of detail provided in the comment. Where appropriate, this responses to comments document includes EIR text changes made in response to comments.

In accordance with CEQA, the responses in this document focus on addressing physical environmental issues associated with the project. Numerous comments were received on the size of the proposed boathouse. These comments do not address physical environmental issues that require a response under CEQA; however, Chapter 8, Project Variant, of this EIR evaluates a variant of the project that would include a larger boathouse. Where relevant to the topics raised in public comments, the responses provide additional information to clarify the project description. These clarifications do not affect the EIR's analysis or conclusions. For informational purposes, this document also provides limited responses to general comments on the draft EIR that were received during the public review period and are not related to physical environmental issues.

This responses to comments document does not include any significant new information that would require recirculation of the EIR under CEQA Guidelines section 15088.5. The comments do not identify any new significant environmental impacts or any substantial increases in the severity of environmental impacts previously identified and analyzed in the draft EIR. The comments also do not identify feasible project

¹ The California Environmental Quality Act, or CEQA, is codified at Public Resources Code sections 21000–21189.

² CEQA Guidelines sections 15382, 15064(c), 15064(d), and 15064(e).

alternatives or mitigation measures that differ considerably from those analyzed in the draft EIR and that would clearly lessen the project's significant environmental impacts.

The draft EIR together with this responses to comments document constitute the final EIR for the project in fulfillment of requirements identified in CEQA Guidelines section 15132. The final EIR has been prepared in compliance with CEQA, including the CEQA Guidelines, and chapter 31 of the San Francisco Administrative Code. It is an informational document to be used by (1) governmental agencies (such as the city) and the public, to aid in the planning and decision-making processes by disclosing the project's physical environmental effects and identifying possible ways to reduce or avoid the potentially significant impacts; and (2) the planning commission and other city entities (such as the San Francisco Public Utilities Commission [SFPUC], San Francisco Recreation and Parks Department [RPD], and San Francisco Board of Supervisors), where applicable before their decision to approve, disapprove, or modify the project. If the city entities approve the project, CEQA requires that they adopt CEQA findings and a mitigation monitoring and reporting program to ensure that mitigation measures identified in the final EIR are implemented.

7.2 Environmental Review Process

CEQA Guidelines sections 15080–15097 set forth the EIR process, which includes input from responsible agencies and the public. The main steps in this process are described below.

7.2.1 Notice of Preparation and Public Scoping

The planning department is the lead agency under CEQA, responsible for administering the environmental review of projects within the jurisdictional boundaries of the City and County of San Francisco (city). On June 9, 2021, the planning department published and distributed a notice of preparation (NOP) of an EIR and notice of public scoping meeting for the project to governmental agencies, organizations, known interested parties, and owners and occupants of properties located within 300 feet of the project site. Distribution of the notice of preparation initiated the *scoping process*, which provides the public and government agencies an opportunity to comment on the scope and content of the EIR. The 30-day public scoping period extended from June 9, 2021, to July 9, 2021.

The planning department held a virtual public scoping meeting on June 23, 2021, to receive oral comments on the scope of the EIR. The scoping meeting presentation was recorded and is available for viewing on the planning department's website. During the scoping period, interested parties provided a total of 80 comments, including letters, emails, and oral comments. While preparing the project EIR, the planning department has considered all comments made by the public and agencies during the scoping period.

7.2.2 Draft EIR Public Review

The planning department published the draft EIR on February 23, 2022, and circulated it to federal, state, and local agencies and interested organizations and individuals for their review and comment. The planning department also distributed notices of availability of the draft EIR to interested parties and individuals, published notification of the draft EIR's availability in a newspaper of general circulation in the Bay Area (the *San Francisco Examiner*), and posted three notices at the project site. Electronic copies of the draft EIR were made available and can be accessed on the planning department's website at

<http://sf-planning.org/sfceqadocs>. Paper copies were made available for public review at the planning department planning information counter and upon request.

The draft EIR public review period extended from February 23, 2022, to April 11, 2022. A public hearing before the San Francisco Historic Preservation Commission was held both in person and remotely on March 16, 2022, for commissioners to provide their review comments. A public hearing before the planning commission was held in person and remotely on March 31, 2022, to receive oral comments on the draft EIR. A transcript of the public hearing is included in Appendix I of this responses to comments document.

During the public review period for the draft EIR, the planning department received written and oral comments from four public agencies, two organizations, and 83 individuals. See Chapter 9, List of Persons Commenting, for a complete list of persons, agencies, and organizations commenting on the draft EIR.

7.2.3 Responses to Comments Document and Final EIR

The comments received during the public review period are the subject of this responses to comments document, which addresses all substantive written and oral comments on the draft EIR. CEQA Guidelines section 15201³ states that public participation is an essential part of the CEQA process. Further, according to CEQA Guidelines section 15204(a), the focus of public review should be “on the sufficiency of the [draft EIR] in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” In addition, “when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.” This responses to comments document focuses on the sufficiency and adequacy of the draft EIR in disclosing the significance of the environmental impacts of the project evaluated in the draft EIR.

The planning department distributed this responses to comments document for review to the planning commission, and to the other public agencies and commissions, organizations, and individuals who commented on the draft EIR. In accordance with CEQA section 21092.5, the planning department has distributed the document at least 10 days before the hearing at which the planning commission will consider certifying the EIR. The planning commission will consider the adequacy of the final EIR—consisting of the draft EIR and the responses to comments document—in complying with the requirements of CEQA, the CEQA Guidelines, and San Francisco Administrative Code chapter 31. If the planning commission finds that the final EIR is adequate, accurate, and complete and complies with CEQA requirements, it will certify the final EIR under CEQA.

If the final EIR is certified, RPD, SFPUC, and all responsible or trustee agencies will then review and consider the final EIR before deciding whether to approve the project or aspects of the project. If RPD and SFPUC approve the project, they will adopt CEQA findings, which will involve adopting or rejecting mitigation measures and alternatives to avoid or reduce significant impacts, and will also adopt a mitigation monitoring and reporting program. Consistent with CEQA Guidelines section 15097,⁴ the mitigation monitoring and reporting program is designed to ensure that the mitigation measures identified in the final EIR and adopted by decision-makers are implemented to mitigate or avoid the project’s significant environmental effects. CEQA also requires that findings be adopted before the approval of a project for which a certified EIR

³ CEQA section 21082.1(b).

⁴ CEQA Guidelines section 15097 cites CEQA section 21081.6 as the authority for the CEQA Guidelines section.

identifies significant environmental effects (CEQA sections 21002, 21002.1, and 21081; CEQA Guidelines sections 15091 and 15092). If the EIR identifies significant adverse impacts that cannot be reduced to less-than-significant levels and the project is approved, the findings must reject the project alternatives and include a statement of overriding considerations for those impacts (CEQA Guidelines section 15093[b]).

7.3 Document Organization

The draft EIR together with this responses to comments document constitute the final EIR. The draft EIR consists of Chapters S through 6 and Appendices A–H.

This responses to comments document follows the draft EIR chapter numbering and consists of Chapters 7–11 plus supplemental appendices, as follows:

- **Chapter 7, Introduction to the Responses to Comments.** This chapter describes the purpose of the responses to comments document, the environmental review process, and the organization of the entire EIR.
- **Chapter 8, Project Variant.** This chapter summarizes and analyzes a project variant that RPD and SFPUC have developed since publication of the draft EIR. The revisions and clarifications to the EIR for the addition of a project variant consist of minor updates to the project description and the associated environmental analysis previously presented in the draft EIR. This chapter concludes that these revisions and clarifications to the project would not result in any new environmental impacts not already discussed in the draft EIR or a substantial increase in the severity of previously identified significant environmental impacts.
- **Chapter 9, List of Persons Commenting.** This chapter lists the public agencies, organizations, and individuals who submitted written comments during the public review period or spoke at the public hearing on the draft EIR. The tables in this chapter indicate whether the persons submitted comments in writing (i.e., via letter or email) during the public comment period, or orally at the draft EIR public hearing. The commenters in each category are listed in alphabetical order. These lists also show the comment code (described below), the format (i.e., public hearing transcript, letter, or email), and the date of each set of comments.
- **Chapter 10, Responses to comments.** This chapter presents the substantive comments excerpted verbatim from the comment letters and public hearing transcript. The letters, emails, and complete transcript containing the comments are provided in Appendix I of this responses to comments document. The responses to comments in this chapter are organized by topic and, where appropriate, by subtopic, in the same order as the environmental topics addressed in draft EIR Chapter 3 and Appendix A (Initial Study). Similar comments addressing the same topic were received from multiple commenters. These comments are grouped together, and a single comprehensive response is provided.
- **Chapter 11, Draft EIR Revisions.** This chapter presents changes and additions to the draft EIR. The planning department has made changes and revisions to the draft EIR either in response to comments received on the draft EIR or to provide updated information, or as necessary to clarify statements and conclusions made in the draft EIR. In all cases, changes are provided to clarify or correct content appearing in the draft EIR or to add information received after the release of the draft EIR. None of the changes or additions in Chapter 11 substantially affect the conclusions presented in the draft EIR.

- **Responses to Comments Appendices.** Appendix I includes full copies of the written comments received on the draft EIR and the transcript of the public hearing held for the draft EIR. The appendix also shows, in the margin of each letter or transcript, the bracketing and comment code used to identify comments and the corresponding response code. Appendix J includes a transportation analysis and other supporting documentation regarding the project variant described in Chapter 8.

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CHAPTER 8

PROJECT VARIANT

8.1 Introduction to the Project Variant

In response to numerous comments from community stakeholders on the design of the Lake Merced West Project (project) described in the draft environmental impact report (EIR), the San Francisco Recreation and Parks Department (RPD) requested that the EIR also analyze a variant of the project (project variant), which would include a 15,000-square-foot boathouse rather than a 3,000-square-foot boathouse; all other project components would remain substantially the same as the project.

This chapter provides a summary of the project variant background (section 8.2), a description of the project variant (section 8.3), and an evaluation of its environmental effects (sections 8.4 and 8.5). The environmental impact analysis considers the whole of the project variant, meaning all components of the Lake Merced West Project with a larger boathouse. Because most of the project variant would remain the same as the project, the impact analysis in this chapter focuses on topics where the larger boathouse could result in effects that differ from the environmental impact analysis presented in the draft EIR, and refers extensively to the information presented in Chapter 3 and Appendix A of the draft EIR where the environmental impact analysis of the variant would be substantially the same as that of the project. Mitigation measures identified in the draft EIR would continue to be required in order to reduce or avoid significant environmental impacts. As discussed in this chapter, no new measures would be required to mitigate the significant impacts identified in the project variant.

The CEQA Guidelines state that information is “significant” if “the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project proponents have declined to implement.” Section 15088.5 further defines “significant new information” that triggers a requirement for recirculation as including, but not limited to, identification of a new significant impact, of a substantial increase in the severity of an impact, or identification of a new feasible alternative or mitigation measure that would lessen the environmental impacts of the proposed project that the project sponsor is unwilling to adopt. CEQA Guidelines section 15088.5(b) states that recirculation is not required if “new information in the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

The environmental analysis of the variant presented in this chapter concludes that none of the above conditions apply with the inclusion of the variant in the EIR. New information added to the EIR in this responses to comments document only serves to clarify or amplify information on the project and to provide appropriate information in the context of the variant. The analysis indicates that: (1) no new significant effects or substantially more severe significant effects would result from the variant beyond those identified for the project; (2) no new mitigation measures are identified for the variant that would be required to mitigate new or more severe significant impacts; (3) with implementation of mitigation measures identified in the EIR, there would be no substantial increase in the severity of an environmental impact under the variant compared to the project; and (4) the variant raises no additional alternatives or mitigation measures considerably different from those analyzed for the project. All necessary environmental analysis of the

variant, based largely on the analysis of the project in the draft EIR, is described in draft EIR Chapter 3, draft EIR Appendix A (initial study), and this chapter of the responses to comments document.

8.2 Project Variant Background

Both the project and the project variant would construct a second boathouse on the shoreline of Lake Merced at the Lake Merced West site. An existing boathouse, the Lake Merced Boathouse, is located at 1 Harding Road and supports five rowing clubs. Constructed in 1958, the boathouse is a two-level concrete structure; each level is approximately 7,600 square feet. The boathouse is open daily from 5 a.m. to 9 p.m. and is primarily used as a storage facility for boats and exercise equipment. Currently, 93 boats are stored in the boathouse. The boathouse also includes a 1,300-square-foot ergometer exercise room.

Five rowing clubs each store a different number of boats in the boathouse, as follows:

- Dolphin Club – 27 boats
- Pacific Rowing Club – 26 boats
- Saint Ignatius High School – 16 boats
- San Francisco Rowing Club – 15 boats
- San Francisco State University – 9 boats

Most users of the boathouse participate in the Saint Ignatius and Pacific Rowing Clubs. Use of the existing boathouse peaks on weekdays, with 283 users per weekday on average. There are approximately 1,658 user trips to the boathouse per week. Along Harding Road there are 69 parking spaces associated with the boathouse; users travel to the boathouse by car, carpool, or (for Saint Ignatius students) by foot.

Rowing teams use specific areas in Lake Merced away from the shoreline for rowing practice (except when using a dock) and row only during daylight hours as there is no outdoor recreational lighting at the boathouse. Under existing conditions, the number of boats on the lake at the same time is generally highest on Saturdays (40 boats). On a typical weekday afternoon, approximately 25 boats are on the lake at a time.

The rowing clubs hold approximately four meets or regattas at South Lake Merced throughout the year, hosted at the boathouse. An estimated 1,000 people attend each rowing meet at Lake Merced. Organizers of special events at Lake Merced, including rowing meet organizers, are required to obtain a permit, provide volunteers to manage parking, and pay for two park rangers to be onsite for the duration of the event.

8.3 Description of the Project Variant

8.3.1 Project Objectives

The project variant would have the same purpose and objectives as that of the project (draft EIR Section 2.3, p. 2-6) and would achieve the project purpose and objectives.

8.3.2 Variant

The main components of the variant would be substantially the same as those of the project (draft EIR Section 2.4, p. 2-6), except with a larger boathouse. Under the variant, RPD would select a concessionaire to construct the recreational facility with a larger boathouse along with the same boat dock and soft landing as

proposed for the project. The shape of the boathouse parking lot and the location of the arborist office and yard would be modified under the project variant. The boathouse would be 15,000 square feet and would provide additional boat storage space for existing rowing clubs as well as new programs and users. All discretionary approvals and agencies involved with the variant would be identical to those for the project as described in the draft EIR (draft EIR, Section 2.8, p. 2-22).

The following subsections describe the variant components that differ from the project: the larger boathouse, the arborist office and yard relocation, and the parking lot layout. **Table 8-1** summarizes the components of the variant that differ from the project, and **Figure 8-1** shows the location of each of these components. **Table 8-2** compares the components of the project and project variant in more detail. Below is a general description of each element followed by a discussion of construction activities, construction schedule, and operations associated with each element in subsequent subsections. All other aspects of the variant are unchanged and therefore identical to the project; refer to draft EIR Chapter 2, Project Description, for a full description of all other aspects of the variant.

Table 8-1 Summary Comparison of the Project and Project Variant

Project	Project Variant	Draft EIR Page Number
Boathouse (3,000 square feet)	Larger boathouse (15,000 square feet)	Draft EIR Section 2.4, p. 2-7
Arborist Office and Yard	Relocated closer to John Muir Drive	Draft EIR Section 2.4, p. 2-8
Boathouse Parking Lot	Modified layout to accommodate access to larger boathouse	Draft EIR Section 2.4, p. 2-12

SOURCE: RPD and SFPUC

LARGER BOATHOUSE

The larger boathouse would be approximately 15,000 square feet, with 3,000 square feet to be used for the same rental watersports equipment storage, a rental kiosk, associated administrative space, and public restrooms as described for the project. The remaining 12,000 square feet would be used by the various clubs to supplement their boat storage needs with space for approximately 42 boats. No changes would be made to the existing Lake Merced Boathouse on Harding Road.

RELOCATED ARBORIST OFFICE AND YARD

The arborist office and yard would be relocated to be closer to John Muir Drive. The office building would remain approximately 3,800 square feet; however, the yard associated with the office building would be smaller. No changes would be made to the arborist office and yard parking spaces or equipment stored onsite.

BOATHOUSE PARKING LOT

The boathouse parking lot layout would be modified to accommodate the larger boathouse and allow circulation through the lot and access to the arborist office and yard. The entry/exit points and number of parking and loading spaces in the parking lot would remain the same as described for the project.

8. Project Variant

8.3. Description of the Project Variant

Table 8-2 Comparison of the Project and Project Variant

Project Component/Structure	Project	Project Variant
Existing Clubhouse	Demolish	Same as project
Rifle Range Building	Demolish	
Caretaker's House	Demolish	
Shell House	Demolish	
Skeet Fields 4-7 and Associated Elements (high and low houses, safety fences)	Repair skeet field 4; demolish all high/low houses and other skeet fields	
Contributing Features Retained ^a	Less than 1	Same as project
Approximate Building Square Footage Retained	None	Same as project
New Buildings— Total Number/Gross Square Feet	5/Approximately 16,300 square feet <i>Includes 3,000 square foot boathouse</i>	5/Approximately 28,300 square feet <i>Includes 15,000 square foot boathouse</i>
Range of Site Uses	<ul style="list-style-type: none"> • Community building • Restaurant with patio and terrace • Open space • Boathouse for rental watersports storage, rental kiosk, and public restrooms • Dock, soft landing • City arborist office and yard • Skate park, ropes course, and restrooms • Sport courts (2-3) • Playground • Picnic areas 	<ul style="list-style-type: none"> • Community building • Restaurant with patio and terrace • Open space • Boathouse for rental watersports storage, rental kiosk, rowing club boat storage, and public restrooms • Dock, soft landing • City arborist office and yard • Skate park, ropes course, and restrooms • Sport courts (2-3) • Playground • Picnic areas

NOTE:

^a "Contributing features are site features that add to the historic associations, historic architectural qualities, or archeological values for which a property is significant. Refer to Figure 5-1 (p. 5-7) and Table 3.2-2 in Section 3.2, Historical Architectural Resources (p. 3.2-17), for additional information about contributing features."



SFO117xxxxD170626.00 - Lake Merced West Recreation05 Graphics-GIS-Modeling-Illustrator

SOURCE: San Francisco Public Works

Lake Merced West

Figure 8-1
Conceptual Site Plan: Larger Boathouse

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8.3.3 Construction of the Variant

Construction of the variant would require essentially the same activities as those for the project evaluated in the draft EIR (described in draft EIR Chapter 2, Project Description). The larger boathouse would be the same height and in the same general location as the smaller boathouse described in the draft EIR. With the larger boathouse, the total square footage of new structures at the site would be about 28,000 square feet, or about 12,000 square feet larger than the proposed project. An additional 1,330 cubic yards of soil would be excavated for the larger building foundation, which would increase the duration of excavated soil offhaul by approximately three days compared to the project, but would not alter the overall building construction schedule of approximately 24 months because soil offhaul would occur concurrently with other construction activities at the site.

In general, the larger boathouse, arborist office and yard, and boathouse parking lot associated with the variant would involve similar sources, types, and quantities of construction materials as the project and the same disposal sites in terms of locations, capacity, and haul distance as the project (draft EIR Section 2.5, p. 2-13).

All components of the variant that are the same as the project would be constructed according to the schedule described in the draft EIR and the overall duration of construction for the variant would be the same as for the project (draft EIR Section 2.5, p. 2-19). Project and project variant construction would each take approximately three years.

8.3.4 Operation of the Variant

Long-term operations of the larger boathouse would expand the rowing community at Lake Merced and would increase available boat storage. Of the 93 boats stored at the existing Lake Merced Boathouse, 42 boats would potentially be moved to the larger boathouse at Lake Merced West. All five rowing clubs would continue to operate out of the existing Lake Merced Boathouse; however, rowers from some of the clubs would potentially move to the larger boathouse at Lake Merced West. Approximately 130 existing rowers would commute by foot or by carpool to the new Lake Merced West Boathouse each weekday, and 70 existing rowers would commute to the site each Saturday. With some rowers at the larger boathouse, the clubs could expand their middle school, adaptive, and masters rowing programs at the existing boathouse from 80 users to approximately 105 users, and potentially store 17 new boats of different sizes at the existing boathouse. **Table 8-3**, on p. 8-8 presents the anticipated growth in rowing club users at the existing boathouse under the project variant. The larger boathouse at Lake Merced West would be open from 5 a.m. to 9 p.m. daily, same as the existing Lake Merced Boathouse and as proposed for the project. Rowing from the larger boathouse would occur during daylight hours; no outdoor recreational lighting is proposed as part of the larger boathouse for the project variant, same as the project boathouse and the existing Lake Merced Boathouse.

During combined operations of both boathouses, on Saturdays up to approximately 45 boats would be on the lake simultaneously, an increase of 5 boats compared with existing and project conditions. On weekday afternoons, approximately 30 boats would be on the lake simultaneously, also an increase of 5 boats compared with existing and project conditions.

Spectators may be drawn to the Lake Merced West boathouse or the Lake Merced West site generally during boating events; however, boating events would continue to be held at the existing boathouse. All other proposed facilities would operate as described in draft EIR Chapter 2, Project Description.

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8.4. Environmental Effects of the Project Variant

Table 8-3 Potential Anticipated Growth in Rowing Club Users at Existing Boathouse

Age/Type of Rowing	Current Users	Estimated Growth in Users	Estimated Total New Users	Estimated Weekly Practice Frequency
Beginning middle school users	25	5	30	Once per week
Advanced middle school users	35	7	42	2 or 3 times per week
Adaptive rowing ^a	0	7	7	2 times per week
Masters program	20	4	24	Once per week
Total	80	23	103	

NOTE:

^a Adaptive rowing is the sport of sweep rowing or sculling for people with physical or intellectual impairments (U.S. Rowing, Guide to Adaptive Rowing, updated February 2015).

SOURCE: San Francisco Recreation and Parks Department

8.4 Environmental Effects of the Project Variant

The scope of and approach to analysis of the variant are the same as for the project discussed in the draft EIR. This section presents results of the analysis of the variant, which is based on the same significance criteria and setting information presented in draft EIR Chapter 3 and Appendix A. All mitigation measures described for the project are applicable to the variant.

8.4.1 Historical Architectural Resources

Draft EIR Section 3.2 discusses project impacts on historical architectural resources. Same as the proposed project, the variant would demolish all four contributing buildings and remove three of the four contributing skeet fields prior to construction of the proposed facilities (including larger boathouse). The variant would, therefore, have the same significant and unavoidable impacts with required mitigation for historical architectural resources as the project.

8.4.2 Aesthetics

Impacts on aesthetic resources would be similar to those of the project for multiple reasons. Same as the project, during construction views into the Lake Merced West site from John Muir Drive would be blocked by the existing fence, and changes to the area would be temporary, resulting in less-than-significant impacts during construction. Once constructed, the larger boathouse would be the same height as the project's boathouse, which would be similar in height to the rifle range building visible in draft EIR Appendix A Figure 6. The boathouse would neither exceed the height of the trees that define the area's skyline nor obstruct scenic public views. While additional vegetation removal would occur in upland areas and along John Muir Drive to accommodate the relocated arborist office and yard, trees removed would be replaced within the site, same as with the project, and would not alter the relative dominance of vegetation in scenic public views of the area from across Lake Merced, same as with the project. The variant would not alter the size of accessory non-public uses on the site and therefore would not conflict with applicable zoning policies. The project variant proposes the same lighting as proposed for the project because the larger boathouse would

not include recreational lighting, same as the project's boathouse. As discussed in draft EIR Appendix A, Impact AE-4 (p. 31), the only permanent exterior light source used during operation of the project (and therefore the project variant) would be safety lighting for evening and nighttime illumination in parking areas, main pedestrian walkways, and around buildings. Same as the project, the project variant's increase in permanent lighting would not substantially affect nighttime views, including those from across Lake Merced, because lighting would be shielded and directed downward and building exteriors would be glazed consistent with the bird-safe standards. Therefore, the project variant would not create new sources of substantial light or glare that could adversely affect daytime or nighttime views in the area, same as the project and a less-than-significant impact.

8.4.3 Transportation and Circulation

Due to the larger footprint of the boathouse, the volume of soil removed under the variant would be approximately 12,330 cubic yards, which is 1,330 cubic yards more than under the project. While the total area of new building construction would be greater, the maximum number of truck trips per day would remain the same because the maximum number of truck trips per day is limited by site access. The variant would require the same peak number of construction trucks and construction workers as were estimated for the project. Construction access and staging under the variant at the project site would be the same as under the project. For these reasons, the variant would meet the San Francisco Planning Department's screening criteria for the types of construction activities that typically would not result in significant transportation effects. As with the project, impacts of the variant related to hazardous conditions for people walking, bicycling, or driving, public transit operations, emergency access, accessibility for people walking or bicycling, or public transit delay during construction would be less than significant.

Operation of the variant would generate more vehicle trips than the project because the larger boathouse would attract new vehicle trips potentially associated with rowers accessing their boats, which would be relocated from the existing Lake Merced Boathouse. The variant would generate 65 more weekday daily vehicle trips and 34 more weekday p.m. peak hour vehicle trips as compared with the project.¹ On weekends, the variant would generate 69 more vehicle trips as compared with the project. The variant would not result in any changes to special events travel demand or freight loading demand as compared with the project because the number and estimated size of special events at the Lake Merced West site would remain the same and activities requiring freight deliveries (restaurant) would remain the same. Similar to the project, the variant would not change the existing sidewalks, bicycle lane, or other aspects of John Muir Drive in a manner that would affect public or emergency access.

The project variant would generate the same weekday p.m. peak hour passenger loading demand for the main parking area as the project. The proposed boathouse would generate approximately 65 daily vehicle trips, 34 of which would occur during the PM peak hour. Vehicle trips to the proposed boathouse would drop off and pick up passengers using the dedicated loading zone fronting the boathouse. The proposed boathouse is anticipated to include at least three loading zones which can be used for freight and passenger loading. Given the number of loading spaces and size of the roundabout area, all freight and passenger loading activity would be adequately accommodated within the loading area and would not result in a vehicle queue that could extend into John Muir Drive. Therefore, loading activity for the proposed boathouse

¹ San Francisco Environmental Planning, Transportation Analysis Memo – Larger Boathouse Variant, October 25, 2022 (Appendix J).

8. Project Variant

8.4. Environmental Effects of the Project Variant

would not result in hazardous conditions for people walking, bicycling, or driving, or substantial transit delay, and passenger loading impacts would be less than significant.

Pursuant to the San Francisco Planning Department's San Francisco Transportation Impact Analysis Guidelines for Environmental Review, projects that generate fewer than 300 vehicle trips during the peak hour would not result in significant transit delay. The variant would generate up to 204 vehicle trips during the p.m. peak hour. Therefore, the variant would result in a less-than-significant transit delay impact, same as the proposed project.

The project variant site is the same as the project site and is in the map-based screening area. Therefore, the variant would not cause substantial additional vehicle miles traveled (VMT) or substantially induce automobile travel, and the impact would be less than significant.

In summary, operation of the variant would result in less-than-significant transportation impacts similar to those identified for the project.

8.4.4 Biological Resources

CONSTRUCTION

Construction of the larger boathouse and relocation of the arborist office and yard closer to John Muir Drive would result in removal of more perennial grassland, mixed coastal scrub, and woodland vegetation than the project; however, the potential impacts on special-status birds and other non-special-status birds foraging or nesting within this vegetation would be less-than-significant, similar as described for the project. The magnitude of the project variant's habitat removal impact on nesting and foraging birds is not substantially greater than under the project; therefore, adverse effects similar to those of the project could occur which would be avoided or reduced to a less-than-significant level through the same standard construction measures for biological resources as the project. Potential impacts of the variant on western pond turtle during construction from vegetation clearing, grubbing and grading under the variant would also be similar to impacts of the project. While the boathouse would be larger, it would not cause ground disturbance outside the boundary evaluated in the draft EIR and therefore would not substantially increase the magnitude of potential adverse effects on this species when compared with the project. Implementation of draft EIR Mitigation Measures M-BI-1a, Worker Environmental Awareness Program Training, and M-BI-1b, Avoidance and Minimization Measures for Western Pond Turtle, would reduce impacts on western pond turtle to less than significant.

The footprint of the dock and soft landing would be the same as the project and therefore, the project variant would have the same impact on shoreline wetlands and waters of Lake Merced. Implementation of draft EIR Mitigation Measures M-BI-3a, Restoration of Arroyo Willow Riparian Scrub and Freshwater Marsh Wetlands, and M-BI-3b, Compensation for Permanent Fill of Wetlands and Waters, would reduce impacts on jurisdictional wetlands and waters to less than significant. Construction of the variant would include the same building demolition and removal of mature trees as the project and thus have the same potentially significant impacts on bat maternity colonies. Implementation of Mitigation Measure M-BI-6, Avoidance and Minimization Measures for Bats, would reduce this impact to less-than-significant. The relocated arborist office and yard under the variant may require the removal of additional immature trees from the mixed coastal scrub and woodland habitat and more trees that could qualify as significant trees under the city's

tree protection policy than the project. As with the project, RPD and SFPUC would comply with the city's tree protection policy for trees (including significant trees) removed or retained under the variant, and plant replacement trees for those removed. Although slightly more mixed coastal scrub and woodland vegetation would be removed under the variant than the project, much of this habitat (which was created after the soil remediation project in 2016) would be retained; thus, the variant would still be consistent with actions identified in the Natural Resources Management Plan for upland areas of the site. Construction of the boat dock and soft landing under the variant would result in the same conflict with Natural Resources Management Plan from removal of freshwater marsh wetlands as the project. With implementation of draft EIR Mitigation Measures M-BI-3a and M-BI-3b which require restoration of arroyo willow riparian scrub and freshwater marsh wetlands, as well as compensation for permanent fill of wetlands, physical impacts of the variant's conflict with management activities would be less-than-significant with mitigation, same as the project.

OPERATION

The projected increase in boat activity on the lake from the larger boathouse under the variant (up to 45 boats, an increase of 5 boats compared with existing and project conditions) would not have a substantially greater impact on western pond turtle use of the shoreline wetlands than the project because boat activity would continue to be concentrated in the deeper portions of the lake. Therefore, operation of the variant would have similar less-than-significant impacts on western pond turtle as the project. Similarly, waterfowl movement, behavior, or use of the lake under the variant would not be substantially different than under the project, and the same less-than-significant impacts on waterfowl would occur under the variant because recreational boating is already permitted on the lake. The variant would include the same new sources of artificial nighttime lighting as the project for public safety in parking areas, walkways, and around buildings, which would be consistent with the city's adopted Standards for Bird-Safe Buildings; thus, the variant's impact on avian migration would be less than significant, as with the project. Design of the larger boathouse under the variant, as with the project, would be required to comply with the Standards for Bird-Safe Buildings to avoid or minimize impacts related to avian collisions, a less-than-significant impact. The impact of noise and visual disturbance from variant operations on special-status and non-special-status birds nesting onsite and on use of bat maternity roosts would be less-than-significant, like the project, because the boathouse, dock, and soft landing would be in the same locations and include similar activities as proposed for the project. Operation of the variant and maintenance of shoreline vegetation around the boat dock and soft landing would have the same less-than-significant impacts on jurisdictional wetlands and waters as the project because the same maintenance activities would occur.

CONCLUSION

The impacts of the variant on biological resources from construction and operation would be reduced to less-than-significant levels with implementation of the same mitigation measures identified for the project, and no new significant impacts would occur.

8.4.5 Air Quality

The increased size of the variant boathouse would result in a minor temporary increase of construction-related pollutant emissions compared with the project, reflecting the increased total square footage of new construction. **Table 8-4** shows the magnitude of this marginal increase and demonstrates that construction-related air pollutant emissions would still be below the significance thresholds, resulting in a less-than-significant impact. Construction equipment associated with the variant would be required to comply with

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8.4. Environmental Effects of the Project Variant

the clean construction ordinance and construction activities would be temporary and variable over the construction period, same as with the project; therefore, toxic air contaminant emissions from the variant would result in a less-than-significant impact on sensitive receptors.

Table 8-4 Average Daily Construction Emissions, Project and Variant

Emissions/Threshold	Pollutant Emissions (Average Pounds per Day)			
	ROG	NO _x	Exhaust PM ₁₀	Exhaust PM _{2.5}
Average Daily Unmitigated Construction Emissions – Project	5.1	46.5	1.8	1.7
Average Daily Unmitigated Construction Emissions – Project Variant	5.3	49.4	2.0	1.8
Significance Threshold	54.0	54.0	82.0	54.0

SOURCE: Bay Area Air Quality Management District, California Environmental Quality Act Air Quality Guidelines, May 2017; Appendix J

The larger boathouse under the project variant would generate an estimated 1,219 daily automobile and transportation network company/taxi trips to the Lake Merced West site, compared with 1,154 generated by the project, resulting in an increase of 65 daily vehicle trips.² Same as with the project, this number of daily trips would be considered a “minor low-impact source” and the trips would be distributed among the local roadway network. Therefore, same as the project, the variant would not emit toxic air contaminants at levels that would expose sensitive receptors to substantial air pollutant concentrations and operational impacts would be less than significant.

8.4.6 Noise

The variant would result in similar temporary construction noise impacts as the project. Although the boathouse constructed would be larger, the same equipment for grading and building construction would be used, the construction duration would be the same, and the larger boathouse would be built in the area of the project site farthest from nearby sensitive receptors. Operational noise resulting from increased vehicle trips associated with the rowing clubs’ use of the boathouse would not be substantially different than under project conditions. The variant would generate 65 more weekday daily vehicle trips and 34 more weekday p.m. peak hour vehicle trips as compared with the project,³ which would increase peak hour roadway noise along John Muir Drive by 0.1 dBA relative to the project. As with the project, the traffic noise impact would be less than significant. Operations of the boathouse combined with operations of other proposed facilities would generate additional recreational noise from non-amplified voices during daily use and if spectators are present during boating meets, but for the same reasons discussed in draft EIR Appendix A, Initial Study, Section E.7 Noise, this would not result in a substantial permanent increase in ambient noise levels. While spectators may be drawn to the Lake Merced West boathouse or the Lake Merced West site generally during boating events, boating events would continue to be held at the existing boathouse and would not generate additional noise that could permanently increase noise levels. Operation of the variant would not alter special events proposed for the project, or require additional motorized equipment or amplified sound beyond that identified for the project, and therefore would have the same potentially significant operational

² Refer to Appendix J.

³ San Francisco Environmental Planning, Transportation Analysis Memo – Larger Boathouse Variant, October 25, 2022 (Appendix J).

noise impacts as the project. Implementation of draft EIR Mitigation measure M-NO-2, Noise Limits for Outdoor Amplified Sound, would reduce variant noise impacts to less-than-significant levels.

8.4.7 All Other Topics

For all other topics, the variant would have environmental effects similar to those of the project, as explained below.

The variant's larger boathouse would be in the same general location as the project boathouse, and therefore the variant would have the same land use impacts as the project. The variant would not result in population growth and would have the same less-than-significant population and housing impacts as the project. Because the variant would be required to implement the same standard construction measures and mitigation measures as the project, impacts of the larger boathouse footprint related to potential archeological resources, tribal cultural resources, and paleontological resources would be less than significant, the same as those anticipated with implementation of the project. The same greenhouse gas emissions regulations would apply during construction and operations as would apply to the project; therefore, greenhouse gas impacts of the variant would be less-than-significant. The larger boathouse would be similar to the project and would not be of sufficient height or mass to create new wind hazards or shadow that could affect the use and enjoyment of publicly accessible open spaces. Therefore, like the project, the larger boathouse would have less-than-significant impacts with respect to wind and shadow. The variant would provide the same recreational opportunities as the project, plus expanded boathouse opportunities, which would increase available recreational facilities and therefore would not cause increased use or deterioration of other existing recreational facilities. The variant would therefore have the same less-than-significant impacts related to recreation as the project.

The variant would have the same number of administrative areas, bathrooms, and facilities as the project, because the larger boathouse is for boat and equipment storage, and therefore the variant would not result in an increase of potable water use compared with the project. The variant would comply with the same solid waste regulations and policies as the project. The utilities and service systems needed to support visitors would be the same as those identified for the project; therefore, impacts on utilities and service systems would be less than significant, same as the project. Like the project, the variant would have less-than-significant impacts on public services, as it would not cause population growth or alter land uses such that new or altered utilities or governmental facilities would be needed. Same as the project, construction of the variant would comply with applicable water quality regulations and implement stormwater best management practices and would have the same less-than-significant hydrology and water quality impacts as the project. Energy use during construction and operation would not be unusually large or inefficient, wasteful, or unnecessary, for the same reasons discussed in the draft EIR for the project. The variant would also comply with the San Francisco Building Code and would not obstruct state or local renewable energy plans. Therefore, the variant would have less-than-significant energy impacts.

The site is not in areas designated by the state or the city as containing mineral deposits of significance, is not zoned for agricultural or timber uses, and is not classified as very high fire hazard severity zones. Therefore, like the project, the variant would not result in any impacts related to these topics.

8.5 Cumulative Impacts of the Variant

Draft EIR Chapter 3, Table 3.1-3 describes past, present, and reasonably foreseeable projects within the general vicinity of the project. The intent of this list is to identify other relevant projects with similar environmental impacts that could contribute to cumulative impacts in combination with the identified impacts of the project. The variant would not extend the overall construction schedule, and would occur at the same site as the project; therefore, the cumulative projects listed in draft EIR Chapter 3, Table 3.1-3 apply to the variant. The approach to the cumulative impact analysis for the variant is identical to that for the project.

As discussed in the draft EIR and summarized in draft EIR Table S-1, the project would not result in a considerable contribution to significant cumulative impacts. As discussed below, the variant also would not make a considerable contribution to any new significant cumulative impacts beyond those identified for the project and would not substantially increase the severity of a significant cumulative impact, and no new mitigation measures would be required. Specific topics are discussed below due to the variant's use of additional equipment during construction and increased vehicle trips and boat use during operations. All other cumulative impacts of the variant would be less than significant, the same as those identified for the project in draft EIR Appendix A.

8.5.1 Historical Architectural Resources

The variant would have the same significant and unavoidable impact on historical architectural resources as the project. The larger boathouse of the variant would be constructed within the project site, and for the reasons discussed in draft EIR Impact C-CR-1, the variant would not combine with the impacts of other projects in the vicinity. The cumulative impact would be less than significant.

8.5.2 Transportation and Circulation

The variant would have the same overall construction schedule as the project; therefore, construction of the variant would overlap with the same cumulative projects identified in draft EIR Impact C-TR-1. For the same reasons discussed in draft EIR Impact C-TR-1, construction of the variant would have less-than-significant cumulative impacts on transportation and circulation.

As discussed above, during operations the variant would generate more weekday vehicle trips and p.m. peak hour vehicle trips compared with the project, but otherwise would result in the same transportation and circulations conditions as the project, including during special events. Passenger loading associated with the additional vehicle trips would occur within the project site, same as for the project, and therefore would not combine with cumulative vehicle trips in a way that would affect accessibility to the site or result in cumulative loading impacts. The variant in combination with cumulative projects would result in less-than-significant cumulative impacts on accessibility, public transit delay, freight and passenger loading, VMT, and hazardous conditions, same as the project. All other cumulative transportation and circulation impacts would be less than significant, the same as those described in draft EIR Impact C-TR-2.

8.5.3 Biological Resources

As discussed above, the variant would have similar construction impacts as the project, and would occur over three years, same as the project; therefore, for the reasons discussed in draft EIR Impact C-BI-1 cumulative biological resources impacts of the variant would be less than significant. As described above in Section 8.3, during operations the variant would have the same lighting as proposed for the project and would be required to comply with the city's Standards for Bird-Safe Buildings, same as the project; therefore, the variant also would have less-than-significant cumulative impacts related to migrating birds and bird collisions. The variant would increase the number of boats on Lake Merced on the busiest day of the week from 40 to 45. As noted in Section 8.2, rowing teams use specific areas in Lake Merced away from the shoreline for rowing practice (except when using a dock). None of the cumulative projects would result in additional boats on Lake Merced, thus the potential cumulative impacts on western pond turtle, waterfowl, wetlands, or other wildlife due to changes in boating on the lake would be less than significant.

8.5.4 Air Quality

The variant would result in less-than-significant cumulative impacts on air quality, same as the project, because, as noted above, the variant's marginal increase in localized toxic air contaminant emissions from new vehicle trips would be minor and would not contribute substantially to cumulative toxic air contaminant emissions when combined with that from the cumulative projects. All other air quality cumulative impacts would be less than significant, the same as those described in draft EIR Impact C-AQ-1.

8.5.5 Noise

Due to the location of the larger boathouse, as discussed above, construction noise from the variant at the nearest sensitive receptors would be similar to that modeled for the project. Construction of the Vista Grande project could overlap with the construction of the variant and cause a noticeable temporary noise increase at the nearest sensitive receptors; however, the variant cumulative condition would have the same duration as the project cumulative condition (two days) and, for the same reasons discussed in draft EIR Impact C-NO-1, the variant would result in less-than-significant cumulative impacts related to construction noise. For the same reasons as discussed in draft EIR Impact C-NO-1, the cumulative operational impact of the variant would be less than significant.

8.6 Conclusion

The variant would not result in any new significant impacts beyond those identified for the project in the draft EIR or substantially increase the severity of a significant impact, and no new mitigation measures would be required. All other impacts of the larger boathouse variant would be either less than significant or not applicable, the same as the project. Additional alternatives beyond those analyzed in the draft EIR have not been introduced because the variant would not result in any new or more severe significant impacts. Therefore, the variant does not add significant new information or change the conclusions of the EIR.

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CHAPTER 9

LIST OF PERSONS COMMENTING

This chapter lists all persons who submitted comments on the draft environmental impact report (EIR). Commenters are grouped according to whether they commented as individuals or represent a public agency or organization. **Table 9-1** lists the commenters' names; the corresponding commenter codes used in Chapter 11, Responses to Comments, to denote each set of comments; the comment format; and the comment date. The complete set of written and oral comments received on the draft EIR is contained in Appendix I, Comments on the Draft EIR. Comments received from individuals after the comment deadline of April 11, 2022, are not listed in this table or Appendix I.

In this responses to comments document, each commenter who submitted written correspondence or provided oral comments during the San Francisco Planning Commission hearing is assigned a unique commenter code in the following manner:

- Commenters from public agencies are designated by "A-" and the agency's name or abbreviation.
- Commenters from organizations are designated by "O-" and the organization's name or abbreviation.
- Persons who commented as individuals are designated by "I-" and the commenter's last name (or other name if the last name was not provided).

If a commenter provided more than one set of comments, the abbreviation or name is followed by a hyphen and number indicating the comment set (e.g., -1, -2, -3). Within each category (public agencies, organizations, and individuals), commenters are listed in alphabetical order by code.

Similarly, each individual comment is assigned a unique comment code. In each comment letter and in the public hearing transcript, individual comments on separate topics are bracketed and numbered sequentially; these numbers follow the commenter code described above, separated by a period. For example, the first comment from the letter submitted by the California Coastal Commission (CCC) is designated as A-CCC.1, the second comment as A-CCC.2, and so on.

In this way, the reader can locate a particular comment in a comment letter or the public hearing testimony by referring to the comment's coded designation. Appendix I shows the bracketing and coding of all substantive comments. These comment codes are used in Chapter 10 to identify which responses apply to which comment.

9. List of Persons Commenting

Table 9-1 Agencies, Organizations, and Individuals Commenting on the Draft EIR

Committer Code	Name, Title, and Affiliation of Commenter	Format	Date
PUBLIC AGENCIES			
A-CCC	California Coastal Commission	Email	April 5, 2022
A-Diamond	San Francisco Planning Commission	Public Hearing	March 31, 2022
A-HPC	San Francisco Historic Preservation Commission	Letter via Email	March 16, 2022
A-Imperial	San Francisco Planning Commission	Public Hearing	March 31, 2022
A-Koppel	San Francisco Planning Commission	Public Hearing	March 31, 2022
A-Moore	San Francisco Planning Commission	Public Hearing	March 31, 2022
A-SFBOS	Supervisor, District 7	Public Hearing	March 31, 2022
A-Tanner	San Francisco Planning Commission	Public Hearing	March 31, 2022
ORGANIZATIONS			
O-CNPS	California Native Plant Society	Letter via Email	April 11, 2022
O-GGAS	Golden Gate Audubon Society	Letter via Email	April 11, 2022
INDIVIDUALS			
I-Allen	Dick Allen	Email	March 5, 2022
I-Austin	Brenda A. Austin	Email	April 6, 2022
I-Aviva	Aviva	Email	April 11, 2022
I-Ballantyne	Maisy Ballantyne	Email	April 11, 2022
I-Blachford	Sedi Blachford	Email	April 11, 2022
I-Blazej	Robert Blazej	Email	April 6, 2022
I-Blee	Patricia Blee	Email	April 11, 2022
I-Boushey	Homer and Virginia Boushey	Email	April 5, 2022
I-Boyd	Kate Boyd	Email	April 11, 2022
I-Brownell	Gail Brownell	Email	March 28, 2022
I-Caliandro	Andrea Caliandro	Email	April 11, 2022
I-Callahan	Christina and Jack Callahan	Email	April 11, 2022
I-Callies-1	Gavin Callies	Public Hearing	March 31, 2022
I-Callies-2	Gavin Callies	Email	April 10, 2022
I-Carman_E	Eric Carman	Email	April 11, 2022
I-Carman_I	Isabelle Carman	Email	April 8, 2022
I-Casement	Chloe Casement	Email	April 11, 2022
I-Chen	Jayne Chen	Email	April 11, 2022
I-Cho	Tami Cho and Adam Heller	Email	April 11, 2022
I-Chu	Eva Chu	Email	April 10, 2022
I-Downey	Patty Downey	Email	April 11, 2022
I-Eigers	The Eigers	Email	April 7, 2022
I-England	James England	Email	March 30, 2022
I-Foster	Doug Foster	Email	April 4, 2022
I-Gabalda	Gregoire Gabalda	Email	April 11, 2022
I-Garnett	Eben Garnett	Email	April 11, 2022
I-Gelman	Marina Gelman	Email	March 30, 2022
I-Griffith	Maddy Griffith	Email	March 31, 2022

Table 9-1 Agencies, Organizations, Individuals Commenting on the Draft EIR (Continued)

Commenter Code	Name, Title, and Affiliation of Commenter	Format	Date
INDIVIDUALS (CONTINUED)			
I-Hagiwara	Nina Hagiwara	Email	April 11, 2022
I-Hall	Robert Hall	Email	April 11, 2022
I-Harrington	Matthew Harrington	Email	April 11, 2022
I-Harris	Jonathan Harris	Email	April 14, 2022
I-Holcomb	Debra Holcomb	Email	April 11, 2022
I-Howard-1	Andrew Howard	Public Hearing	March 31, 2022
I-Howard-2	Andrew Howard	Email	March 31, 2022
I-Johansen	Genevieve Johansen	Email	March 30, 2022
I-Johnson-1	Adrian Johnson	Email	March 30, 2022
I-Johnson-2	Adrian Johnson	Email	April 4, 2022
I-Kahn-Kirby	Amanda Kahn-Kirby	Email	April 11, 2022
I-Keene	Amanda Keene	Email	April 10, 2022
I-Khaishgi	Ahmed Khaishgi	Email	April 2, 2022
I-Kirby	Mason Kirby	Email	April 11, 2022
I-Koenig_E	Emily Koenig	Public Hearing	March 31, 2022
I-Koenig_P	Peter Koenig	Email	April 9, 2022
I-Lambert-1	Leslie Lambert	Public Hearing	March 31, 2022
I-Lambert-2	Leslie Lambert	Email	April 11, 2022
I-Li	Joan's Li	Email	March 31, 2022
I-Luongo_H	Heather Luongo	Email	April 10, 2022
I-Luongo_P	Phil Luongo	Email	April 10, 2022
I-Lynch_H	Harrison Lynch	Email	April 11, 2022
I-Lynch_S	Sarah Lynch	Email	April 11, 2022
I-Matsumura_D	Diane Y. Matsumura	Email	April 11, 2022
I-Matsumura_R	Robert Matsumura	Email	April 11, 2022
I-McGahey	Elena Marron McGahey	Email	April 4, 2022
I-McManus	Katrin McManus	Email	April 11, 2022
I-McNulty	Carolyn McNulty	Email	April 3, 2022
I-Miller	Tim Miller	Email	April 11, 2022
I-Milner	David Milner	Email	April 11, 2022
I-Moreland	Chip Moreland	Email	April 10, 2022
I-Morten	Dick Morten	Email	March 3, 2022
I-Murphy	Bart Murphy	Public Hearing	March 31, 2022
I-Nelson	Sam Nelson	Public Hearing	March 31, 2022
I-Niclas	Josh Niclas and Adrienne Fratini	Email	April 11, 2022
I-Okon	Christine Okon	Email	March 31, 2022
I-O'Neill	Shannon O'Neill	Email	April 11, 2022
I-Panasik	Jen Panasik	Email	April 10, 2022
I-Paras	Chris Paras	Email	April 11, 2022
I-Paul	Mike Paul	Email	March 31, 2022
I-Perry	Racheal Perry	Email	April 11, 2022

9. List of Persons Commenting

Table 9-1 Agencies, Organizations, Individuals Commenting on the Draft EIR (Continued)

Committer Code	Name, Title, and Affiliation of Commenter	Format	Date
INDIVIDUALS (CONTINUED)			
I-Petitt	Claire and Saskia Petitt	Email	March 31, 2022
I-Post	William N. Post	Email	April 11, 2022
I-Powell-1	Wes Powell	Public Hearing	March 31, 2022
I-Powell-2	Wes Powell	Email	April 4, 2022
I-Rich	Rich	Public Hearing	March 31, 2022
I-Rosen	Jenny Rosen	Email	April 11, 2022
I-Rosenblum_K	Kim Rosenblum	Email	March 30, 2022
I-Rosenblum_S	Sam Rosenblum	Email	March 30, 2022
I-Ruiz	Lynda M. Ruiz	Email	April 11, 2022
I-Sanders	Doug Sanders	Email	April 11, 2022
I-Scott	Jan Scott	Email	March 30, 2022
I-Smith	Amelia Smith	Email	March 30, 2022
I-Tucker	David Tucker and Pat Tucker	Email	April 5, 2022
I-Vasquez	Nick Vasquez	Email	April 11, 2022
I-Vaughan	Sheila Vaughan	Email	April 11, 2022
I-Walti-1	Mary and Joshua Walti	Email	April 10, 2022
I-Walti-2	Mary Walti	Email	March 31, 2022
I-Wawrzonek	Christian Wawrzonek	Public Hearing	March 31, 2022
I-Will	Ben Will	Email	April 4, 2022
I-Wisner	Penni Wisner	Email	April 9, 2022
I-Yeh	Jenny Yeh	Email	April 11, 2022

CHAPTER 10

RESPONSES TO COMMENTS

10.1 Organization

This section presents the substantive comments received on the draft environmental impact report (EIR) and responses to those comments. The responses to comments are organized by subject and are generally in the same order as presented in the draft EIR, including the initial study (Appendix A). The San Francisco Planning Department (planning department) did not receive comments on all draft EIR environmental topics; therefore, the number of topics listed below and addressed in this responses to comments document is smaller than the number in the draft EIR.

General comments on the EIR, including comments on the merits of the project, are grouped together toward the end of the chapter. Comments unrelated to a specific draft EIR section or impact category are also classified as general comments. Comments on specific mitigation measures are included under the comments regarding the relevant impact category of the draft EIR.

This chapter presents the responses to comments in the following order, and with the following prefixes to the environmental topic and response codes (indicated in brackets):

- | | |
|--------------------------------------|---------------------------------------|
| 10.2 Project Description [PD] | 10.7 Noise [NO] |
| 10.3 Alternatives [AL] | 10.8 Biological Resources [BI] |
| 10.4 Aesthetics [AE] | 10.9 Hydrology and Water Quality [HY] |
| 10.5 Tribal Cultural Resources [TCR] | 10.10 General Comments [GC] |
| 10.6 Transportation [TR] | |

In each section under each topic, similar comments are grouped together and identified using a topic code prefix and sequential numbering for each subtopic. For example, project description [PD] comments are listed as Comment PD-1, Comment PD-2, Comment PD-3, and so on, and the corresponding responses are similarly coded as Response PD-1, Response PD-2, Response PD-3, and so on. Each topic code has a corresponding subsection heading that introduces the comment's subject. These subsections reproduce the comments and include the commenter's name and the commenter code as described in Chapter 9, List of Persons Commenting. Comments containing language that is unique to an individual commenter are presented verbatim. Comments containing language that is substantially similar or identical to that of four or more other comments are grouped and one of those comments, referred to as a "representative comment," is presented verbatim.

See Appendix I for the full text and context of each comment letter or email, as well as the public hearing transcript. In that appendix, the bracketing of the substantive comments and the associated comment code and response code are provided in the margin of each comment, allowing the reader to locate the response to an individual comment.

10. Responses to Comments

10.1 Organization

Following each comment or group of comments, a comprehensive response is provided to address the issues raised in the comment and to clarify or augment information in the draft EIR as appropriate. Response numbers correspond to the topic code; for example, the response to Comment PD-1 is presented under Response PD-1. The responses may clarify the draft EIR text or revise or add text to the EIR. Revisions to the draft EIR are shown as indented text. New or revised text, including text changes initiated by planning department staff, is double underlined; deleted material is shown in ~~striketrough~~.

Footnotes included in written comments are numbered as in the original letter or email and thus may be nonconsecutive. Footnotes to responses are numbered consecutively.

10.2 Project Description

The comments and corresponding responses in this section cover subjects related to draft EIR Chapter 2, Project Description, some of which are relevant to and addressed in the draft EIR. The comment topics relate to:

- PD-1: Public Access
- PD-2: Boathouse and Rowing
- PD-3: Project Implementation
- PD-4: Project Objectives

Comment PD-1: Public Access

Response PD-1 addresses the following comments, which are quoted below:

A-CCC.5, A-Imperial.3, A-Moore.5

“Regarding low-cost low-cost [sic] visitor-serving uses please provide more information on whether any parts of the proposed project will require fees to use or enter.” (Peter Benham, North Central Coastal Planner, California Coastal Commission [A-CCC.5])

“And if we're going to also -- I would echo Commissioner Moore in her comment around the racial-social equity in terms of accessing this area. I think we really need to emphasize as well the public transportation access and other forms of transportation aside from cars.” (Theresa Imperial, Commissioner, San Francisco Planning Commission [A-Imperial.3])

“How does the project serve social equity? I think the remote location of the site makes it difficult for the city at large to come here. There's hardly any public transportation. However, only expecting that people would come here by car creates a burden that I think we need to seriously consider. We all know that the need of open space in this particular form has increased and come into a stronger focus through COVID and the ability of people not having their own open spaces. So finding access and accessibility to this newly potential open -- open space I think is something that the EIR should seriously consider.” (Kathrin Moore, Commissioner, San Francisco Planning Commission [A-Moore.5])

RESPONSE PD-1

Comment A-CCC.5 expresses concern about access to the project site and the cost of recreational activities. As stated in the draft EIR, access to the project site's path and trail system, open space, playground, basketball court, multi-use sport court, skatepark, viewing deck, parking areas, and non-group picnic and

terrace patio would be free of charge during regular hours. Some areas of the site that would require fees for participation include the ropes course, boat rentals, boat launch, programming, and group picnic areas, as described in draft EIR Chapter 2, Project Description, 2.7.1, Recreational Facility Operation (p. 2-21).

Comments concerning access to the site by public transportation (A-Imperial.4, A-Moore.5) are acknowledged; public transportation to the site is under the purview of other city agencies and changes to public transportation are not currently proposed as part of the project. These comments do not raise specific issues concerning the adequacy or accuracy of the EIR's analysis of physical environmental impacts of the project as proposed. However, such comments, including recommendations for project modifications or enhancements, may be considered and weighed by the decision makers before they make a final decision to approve, modify, or disapprove the project.

Comment PD-2: Boathouse and Rowing

Response PD-2, p. 10.2-20, addresses the following comments, which are quoted below:

A-Diamond.2, A-Imperial.1, A-Moore.1, A-SFBOS.3, A-Tanner.2, I-Allen.1, I-Ballantyne.1, I-Blachford.1, I-Blazej.1, I-Blazej.2, I-Boushey.1, I-Brownell.1, I-Brownell.2, I-Brownell.4, I-Brownell.5, I-Brownell.6, I-Callies-1.1, I-Callies-2.1, I-Chu.1, I-Garnett.1, I-Holcomb.1, I-Kahn-Kirby.1, I-Kirby.1, I-Khaishgi.2, I-Koenig_E.1, I-Lambert-1.1, I-Luongo_P.1, I-Lynch_H.2, I-Milner.1, I-Morten.1, I-Nelson.1, I-Perry.1, I-Post.2, I-Powell-1.1, I-Powell-2.2, I-Powell-2.3, I-Powell-2.4, I-Rich.1, I-Tucker.1, I-Wawrzonek.1, I-Wisner.1

Response PD-2 also addresses the following comments that are similar or identical to the two representative comments quoted on pp. 10.2-19 and 10.2-20 and are not individually listed to avoid repetition:

I-Austin.2, I-Aviva.2, I-Casement.2, I-Caliandro.2, I-Chen.2, I-Cho.2, I-Carman_E.2, I-Carman_I.2, I-Downey.2, I-Eigers.2, I-England.2, I-Foster.2, I-Gabalda.2, I-Gelman.2, I-Griffith.2, I-Hagiwara.2, I-Harrington.2, I-Harris.2, I-Johansen.2, I-Johnson-1.2, I-Johnson-2.2, I-Koenig_P.2, I-Lambert-2.2, I-Lynch_S.2, I-McGahey.2, I-McManus.2, I-Miller.2, I-Paul.2, I-Petitt.2, I-Rosen.2, I-Rosenblum_K.2, I-Rosenblum_S.2, I-Ruiz.2, I-Sanders.2, I-Smith.2, I-Scott.2, I-Vasquez.2, I-Vaughan.2, I-Yeh.2

I-Blee.1, I-Boyd.1, I-Callahan.1, I-Keene.1, I-Li.1, I-Luongo_H.1, I-Matsumura_D.1, I-Matsumura_R.1, I-McNulty.1, I-Niclas.1, I-O'Neill.1, I-Panasik.1, I-Paras.1, I-Walti-1.1, I-Walti-2.1, I-Will.1

“That being said, especially in light of the comments that we heard today, I feel like it's important to ensure that in the response to comments, that staff take all the steps that are necessary to address impacts that would come from a larger boat facility so that if the decision makers ultimately do go along with the wishes of the rowing club, that they're not held up by having to redo any CEQA documents. That this CEQA document should be broad enough, explicitly broad enough, to cover that solution if that's where the ultimate decision makers decide to land.” (Susan Diamond, San Francisco Planning Commission [A-Diamond.2])

“Thank you, Supervisor Melgar, for coming here and also for the rowing community that also came in here. Actually eight years ago I was trying to find a place to row or a club to row. And I was trying to look for a dragon boat team. The one thing I could find was in Oakland and in South San Francisco. So I ended up joining a dragon boat team in South San Francisco and ended up quitting because it just took a lot of my time. Dragon boat and rowing takes a lot of your time and, you know, I'm working out, by the way. Takes about -- I believe you have to practice three times a week for that. And by that time, too, I got to see the kind of facility that we had in South San Francisco. And to hear that this facility is 3,000 square feet, it's not enough because the boats are actually longer and then there's also -- also some of the storage for the equipment's need to be there.” (Theresa Imperial, Commissioner, San Francisco Planning Commission [A-Imperial.1])

“I just wanted to say that public comments have been extremely important. I thank everybody. And particularly Supervisor Melgar for taking an important point of the discussion right into the center of where we are with this project. This project is quite large, it's a unique one, once-in-a-lifetime opportunity to reconsider a major public open space to have relevant -- relevance to what our citizens need. I'm in full support to thoroughly examine the PRC and the SI rowing clubs in the context of the larger lake becoming an expanded resource for rowing. These comments very much echo what I experienced when doing the Treasure Island EIR, most recently with protecting and expanding public access for city use to the water. In that particular case sailing, canoeing and windsurfing. We also had, last week, in the review of the Waterfront Plan requests for considering the South End and the Dolphin Rowing and Swimming with respect to use of water. So thank you commissioner -- Supervisor Melgar for your comments and putting them right up front on this.” (Kathrin Moore, Commissioner, San Francisco Planning Commission [A-Moore.1])

“And I wanted it to be on the record because when we have the funding to go ahead with redeveloping the site of the lake, we want to make sure that the desires and the needs of the community are reflected. The Pacific Rowing Club specifically has been a point of access for underserved youth to get into rowing, which has traditionally been an activity that has been more exclusive because of the expense, you know. And they have a waiting list particularly during the summer, that they can't -- they can't fill. At -- the current facilities are very neglected. And, in fact, a little bit dangerous. So the opportunity to move things to the other side and to make them have the capacity to serve not just the needs that we currently have, but to grow the access to the lake is really, really important.

So I'm just here to state on the record that I understand that the Recreation and Parks Department position is that they don't need to put it in the EIR, the community did have lots of input about this. I wanted it to be on the record with the Planning Commission that we wish the facilities that were being presented in the EIR included a larger boat dock and space for more boating, because that is what the community currently needs. And that we're hoping that in the future as we make this sport more equitable and access to west side park resources, more equitable, we can just grow our capacity and build our infrastructure to make that happen. So thank you so much for considering our little corner of the world. And I want to particularly thank Dick Morton and Coach Sam Nelson with the SI Rowing Club for being great and participating in this process.” (Myrna Melgar, City and County of San Francisco District 7 Supervisor [A-SFBOS.3])

10. Responses to Comments

10.2 Project Description

“Certainly I think what -- if I understand the EIR correctly, the larger boathouse was considered but was not included because it was deemed to not have additional environmental impacts by having a larger boathouse. Certainly can appreciate the concern, though, and the desire that having it in there feels a little extra secure, that there's extra space, it's been considered. And so if things change between now and when the park comes to fruition and perhaps even future expansions, if incremental progress is made that the environmental is not the hurdle that we have to get over to have additional space. I just want to acknowledge those comments and we really do hear what you're saying, your perspective on that.” (Rachael Tanner, Commissioner, San Francisco Planning Commission [A-Tanner.2])

“My name is Dick Allen, District 7, member of the Dolphin Club at Lake Merced. I have rowed on the lake for over 15 years and I was a founding member of the Lake Merced Merced Task Force and co-chair of the water committee. I strongly recommend that Rec & Park amend their EIR to include a new boathouse located on the site that is currently being proposed for a tree trimming facility. Rec & Park’s current proposal for this building on a waterfront site is a terrible mistake. The proposed site for a tree trimming is a perfect location for a new larger boathouse for water recreation that will provide easy and safe access to the water. Rec & Park needs to amend their EIR that would conform to the 2010 Watershed Report, a well-thought plan that took several years to prepare and cost \$588,000. This report was paid for by the San Francisco Public Utilities Commission, the Lake Merced landlord, and they made this report a gift to their tenant, the San Francisco Rec and Park Department. I look forward to a revised EIR” (Dick Allen [I-Allen.1])

“I am a current high school rower at Pacific Rowing Club, at Lake Merced, and I want to echo the messages you've been receiving regarding the Lake Merced West site. I’ve been a part of PRC for close to three years now. Joining the rowing community has been the best decision of my life. I think I speak for all of my teammates when I say that Lake Merced is truly our second home. It’s such a privilege to have a supportive and hardworking community to go to every day. My team is a diverse group of young people from all over the city, and rowing is something that connects us all.

We would love to be able to provide for as many young people and adults as possible, but at the moment, our current facility at 1 Harding Road limits our ability to do so. SFRPD's proposed plans for the SE portion of the Lake Merced West site, are inadequate and ignore the major activity at the lake - rowing. As Lake Merced is the largest lake in the city of San Francisco, it is so important for these plans to be site-specific, and cater to the activities on the water.

Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.” (Maisy Ballantyne [I Ballantyne.1])

“Dear Julie Moore,

My name is Sedi Blachford, I'm a senior in high school and I've been rowing with Pacific Rowing Club since 7th grade. I was hoping to add my voice to the discussion around the Lake Merced West EIR and proposed recreation facility. Rowing has been an extremely important aspect of my life throughout my years of

participation, and I can say without a doubt that being able to row with Pacific Rowing Club has made me a better student, athlete, and community member. Having better facilities for both PRC and SI would only augment that effect for other athletes.

I've looked through the proposed plans on the public scoping meeting presentation, and I'd like to echo the suggestions of both PRC and SI.

Rowing is one of the primary uses of the lake, and the amount of space designated for the new boathouse doesn't reflect the importance of the rowing community to Lake Merced. Having more dock space for launching could make the lake more inviting to non-rowing water sports such as stand-up paddle boards or kayaking, as there wouldn't be as much competition for launching space.

There is one other point I wanted to mention, which could already be part of the proposed plan but I couldn't tell from any of the drawings or writing on the suggested project. It is absolutely necessary that there are restrooms available at the new boathouse, not just on the west side of the site.

To end with some of the language written by PRC and SI:

Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

Again, I can't emphasize enough the importance that rowing has had on my adolescence, and I'm certain any other young rower would say the same. The boathouse provides a special community that can use your support to grow bigger and better.” (Sedi Blachford [I-Blachford.1])

“Below is a form letter from St. Ignatius and Pacific Rowing Club which I fully support. I just wanted to add personally that rowing was a vital part of my youth, teaching me teamwork and perseverance that has guided me throughout my life.

A native San Franciscan, I rowed for Pacific Rowing Club while at Lowell. I went on to row for Cal as an undergraduate and then returned to Cal and UCSF for my graduate studies.

Afterward, I created a biotech company in San Francisco. None of that journey was easy for me and I honestly would not have made it if not for the lessons I learned rowing in San Francisco.

Getting out on the glassy morning water and pushing to your limits is a magical and guiding experience I hope more San Franciscans can experience.

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced website. Thank you for all the work you've done for the Draft EIR thus far.” (Robert Blazej [I-Blazej.1])

“SFRPD's proposed plans for the SE portion of the Lake Merced West site remain inadequate and don't reflect the known needs of the rowing community. The plans assessed in the EIR need to include a major

10. Responses to Comments

10.2 Project Description

boathouse with at least 14,000 sq/ft of boat storage space. Please replace the highly insufficient plans being used by the EIR with one that incorporates SI's and PRC's jointly-created vision for the SE portion of the site.

Rowing for All: The space is essential for the community's joint vision of supporting far more than the current 400+ youth and adults, one that provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. A cornerstone of this effort is increasing access and engagement for people of color and traditionally- underrepresented youth and adults.

The envisioned rowing center would provide for the most diverse range of San Franciscans. More adults and youth, of all abilities and backgrounds. The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport develops and strengthens the mind and body of all who want to row. It provides considerable pathways for advancement towards college, and for a healthy and fulfilling life beyond.

The entirety of the SE portion of Lake Merced West beyond the southern buildings should be committed to rowing-related facilities and operations, and not include arborist facilities. A boathouse depends on access to water, whereas an arborist facility does not.

Include rowing professionals and rowing community leaders in the planning process for the rowing center area, and let them lead or direct the layout and design of the boathouse and related facilities. Specifically involve PRC and SI, as they developed all of this for the first round in 2015 and 2016 and their combined communities are uniquely positioned to be essential assets in this effort.” (Robert Blazej [I-Blazej.2])

“Dear Julie Moore and associated Commissioners and Staff,

Our grandson is a 7th-generation San Franciscan who took part in a youth program of the Pacific Rowing Club and is now on the Crew team of St. Ignatius high school. That means we have had the chance to watch Crew meets at Lake Merced and also at other facilities, like Oakland and Redwood City. Our experience has led us to implore you to pay attention to the messages you've been receiving regarding the Lake Merced West site.

In essence, the City has the opportunity to transform a recreational site from a dingy, outmoded one into a major attraction and resource, as it did in remodeling the tennis courts at Golden Gate Park into the world-class Goldman tennis center. We should now do the same for Crew, a wonderfully healthy sport that was once, like tennis, a hobby of the well-off, but that is now open to people from all levels of society and eager to embrace them. The interest in rowing will explode when George Clooney's film, “The Boys in the Boat” is released. The Pacific Rowing Club, St. Ignatius High School, and the rowing community of our city will be ready and eager to welcome those from all walks of life who are inspired to take up rowing

The West Coast Scholastic Championships for Crew will be held at Lake Merced on April 24, a rare opportunity, for the facilities are so much better in SoCal. Please come to see the event at Lake Merced. You'll see why Crew is such a wonderful sport for boys and girls, men and women. You'll also see how inadequate the current facilities are.

Taking advantage of this opportunity to upgrade the facilities at Lake Merced would put San Francisco on the map for an internationally growing sport. So while we thank you for the work you consider. Please don't let this chance slide by.

- The plans in the Draft EIR continue to include a highly insufficient watercraft facility that falls short of the known needs and vision of the community. Existing and foreseeable future recreational demand is not adequately provided for, at the current boathouse at 1 Harding Rd or through the plans in the EIR, and the EIR's proposed plans would not add suitable water-oriented recreational facilities to the lake.

- Please replace the plans being used by the EIR with ones that incorporate the rowing community's jointly-created vision for the southeast portion of the site. Have the much larger facility be the primary plan in the EIR, not a discarded alternative. Include rowing leaders - those who know the sport - in the planning process.

- A new, much larger boathouse will make a difference in the lives of thousands of adults and young people of all backgrounds and abilities every year. The current boathouse at 1 Harding Road already cannot adequately serve the 400+ youth and adult rowers at the lake.

- The desperately-needed facility is essential for the community's joint vision of rowing at Lake Merced, one that not only expands youth rowing opportunities, but provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. It will be a true community center, one that provides a welcoming and engaging atmosphere for people of color and those who are traditionally underrepresented in the sport.

5 - The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport can develop and strengthen the mind and body of all who want to participate. It provides considerable pathways for advancement towards college if desired, and for a healthy and fulfilling life. Help the rowing community change lives, and please recognize the legacy, vision, and expertise that the teams bring to the table” (Homer and Virginia Boushey [I-Boushey.1])

“Hello Julie,

Below are comments for the project. The main point is that there seems to be a neglect of recognition of the largest existing user of Lake Merced - rowing clubs. The word rowing is not even in the list of activities at the lake in the summary of the project. Please at least add that.

Since this is an environmental impact report, some positive impacts related to rowing that could be included:

a new boathouse would reduce raccoon temptation, and population hopefully new docks could allow for solar powered instead of gas powered launches for coaches, reducing gas engine noise and impact on lake - new boathouse and parking might reduce traffic impact of regattas?” (Gail Brownell [I-Brownell.1])

“S.3.1. Project Location and Proposed Facilities

Add to the second paragraph in the listing of activities: rowing.

Why? One of the major uses of the lake is the FOUR rowing clubs that row out of the boathouse on the Lake. On a daily basis 100 to 200 high school and adult rowers use the lake. The current boathouse is undersized and in need of upgrade.

Check out this history article:

<https://tonyhallsf.wordpress.com/2010/04/07/the-duel-at-the-boathouse-at-lake-merced/>

And a recent article in Chronicle about a high school regatta with many rowers coming to Lake Merced from elsewhere

<https://www.sfchronicle.com/bayarea/article/Photos-capture-young-rowers-sculling-on-Lake-16997599.php>

Figure S-3 COMMENTS

Adjust the size of the boathouse to make it realistic for rowing shells. 8 person rowing shells are over 60 feet long. Storing an maneuvering [sic] requires specific design.

Adjust the size of the dock and add another dock for effective rowing shell launching and retrieval. When all four clubs are rowing much more dock length is needed as the various teams launch and return.

Parking - allow one large parking area for trailer rowing shells. Trailers are long in order to carry the 60 foot long shells.

(each club has several - novice intermediate varsity)” (Gail Brownell [I-Brownell.2])

“2.4 Project Characteristics page 2-6

Include rowing in the list of activities, since rowing brings 100-200 people daily to the Lake.

BOATHOUSE Page 2-7 NO mention of rowing!!!! the major current water activity on the Lake.

Include rowing and involve rowing community in design. There should be two docks the docks should be longer or designed with two launching side pieces.

ARBORIST OFFICE AND YARD

Add parking space in the arborist yard for the large rowing trailers needed by rowing clubs. Compatible use - large items.

WATER RECREATION page 2-12

Work with the rowign [sic] community on dock design. A KEY point is that the dock for rowing shells needs to be very low to the water. Standard docks that work for other boats will not work for rowing shells.” (Gail Brownell [I-Brownell.4])

“2.7 PROJECT OPERATION

2.7.1 Recreational Facility Operation

Regular hours" for rowing boathouses : Rowers have to practice before an after school so early morning is important. Rowers are there before sunrise, often 5am until 8 am and late afternoon are the busiest times. That is why most people do not realize how many rowers use the Lake now, most people are not up and awake when rowers are practicing.” (Gail Brownell [I-Brownell.5])

“In response to the NOP, commenters recommended that the city include a larger boathouse as part of the project. The planning department, RPD, and SFPUC considered an alternative site layout that would have included a larger boathouse at the southeastern end of the site. However, because a larger boathouse would not have avoided or substantially lessened the significant effects of the project compared with other partial or full preservation alternatives, it was selected for detailed evaluation as a CEQA alternative.” (Gail Brownell [I-Brownell.6])

“Hi. Good afternoon, commissioners.

My name is Gavin Callies and I'm also here on behalf of the Pacific Rowing Club regarding the development of Lake Merced West. I didn't realize that Supervisor Melgar would be here this afternoon, so I appreciate everything she said and she took most of the words out of my mouth. But I do -- I just want to reiterate everything that's been said already. The facility that's been drafted up for this EIR is a bit on the small side. We are trying to grow our program. We're trying to help the community more, you know. We just started an adult program six months ago or so. And you know, we've gotten people who have rowed before and we've gotten people who haven't rowed at all and we've gotten people who just are coming out to row with, like, their kids. And they're making these connections and they're doing all these things that -- sorry. Just are making a big influence on their life. I was the first person in my family to graduate from a four-year college and rowing definitely opened the door for me to do that. And I'm sticking here with PRC and I'm helping them out and doing things around to make sure things go better. It would be just really great if we could have more opportunities and bigger facilities to see our vision and help more people and just keep our community together. Thank you.” (Gavin Callies [I-Callies-1.1])

“My name is Gavin Callies and I’m writing on behalf of Pacific Rowing Club regarding the EIR for the Lake Merced West project which will take place on the site of the old Pacific Rod and Gun shotgun range. First, I would like to say I appreciate the planning department's vision and efforts to push for a full restoration and revitalization of the area. As a young child I spent many days at the shotgun range and have many fond memories of spending time with my family there enjoying skeet and trap shooting. If there was anyone particularly sad about seeing the shotgun range close, I was definitely on that list. That being said, I fully acknowledge that the range is never coming back, the buildings there beyond repair, and I believe the entire site should be cleared to make way for a new vision. For this, I am glad the planning department is pushing to have the old buildings removed and pay homage to the legacy of the range in a more nuanced manner.

Beyond that though, I can’t say that I agree with most of the plans that have been drafted up for the EIR. Lake Merced is a unique resource in our city that could facilitate very specific activities, watersports, and I believe the EIR falls very short realizing this reality. Just looking over the objectives of the project, I feel that current plans aren’t fully optimizing those wants. PRC fully aligns with the project objectives and would love

to see all of them fulfilled. We just believe a different site plan would better achieve the objectives that have been laid out.

Our main ask is that a larger, multi use, aquatic center be incorporated into the plan.

We understand that environmental impact would be slightly greater, but we believe the benefits to the community would be exponentially outweighed. PRC has a 42 year history of serving the youth of San Francisco and have been trying to expand our capacity to serve more people in recent years. We currently have about 200 youths on our roster between our middle school and high school programs and we have about 20 members in our newly formed adult program that started this past fall. Unfortunately we are pushing our limits on the amount of people we can serve as our current facility is too small to hold more equipment that would allow us to serve a greater portion of the community.

The current site plan has a restaurant, community center, and a very small boathouse, unusable by the rowers, as 3 separate buildings. I believe that if a large aquatic center were to be part of the plan instead of these three separate facilities, a larger and more diverse segment of San Franciscans could be served in a better manner. A large aquatic center that was 2-3 stories tall could integrate a community center, community workout room, office space for aquatic center operations, restaurant, locker rooms, and more. I feel having this one large facility would free up more space on the rest of the lot for the open nature and picnic areas that would like to be seen on the site.

Rowing has had the most amazing impact on my life. I am the first person in my family to have graduated from a 4 year college and I can say without question rowing was the conduit for accomplishing that. I found rowing in high school and it provided the spring board I needed to get myself into my first choice of college. Once in college, while I sometimes struggled academically, being on the rowing team provided me the structure and support to continue with school and graduate on time. While I acknowledge the vast amounts of support I had from my family and others in my life, being a part of a crew team was the foundation that kept me motivated to finish college and achieve my dreams. I want to afford these same opportunities to the next generation, which is why I have returned to work in the sport that gave so much to me. We see many youths every year that we already help achieve their dreams, but a new, larger facility would help us support more youths in this one area, while simultaneously opening doors that could enhance this corner of San Francisco for everyone who wants [sic] to enjoy the lake, even if it's through another watersport that could be housed in the same facility.

Thank you for all your hard work and hearing our vision for what could be at Lake Merced to enhance the lives of as many people in our community as possible.” (Gavin Callies [I-Callies-2.1])

“I reviewed the project EIR for Lake Merced at the former SF Gun Club. Activities proposed did not take into consideration the current rowing activities at the lake. I don't know if you know, but hundreds of people, from teenagers to seniors, row at the lake weekly. Rowing is the number one activity happening on the lake daily. It is the best sport for kids who don't make the basketball, football, soccer or baseball teams at school. These kids become elite athletes in this sport. The rowing programs at the lake are very successful in developing character, discipline, spirit of competition, camaraderie and all the good stuff you wish for your kids. And rowing should continue at the lake in the foreseeable future. Any future development at the lake should include the growth of rowing for the people of San Francisco. Thank you for your consideration of this great sport.” (Eva Chu [I-Chu.1])

“Dear Julie Moore,

As a master's rower at SF Rowing Club and the parent of a middle-school rower at Pacific Rowing Club, I am concerned that the proposed “new boathouse” plans for the Lake Merced West site have not factored “Rowing” into the design. Rowing has been the primary activity on Lake Merced for decades. Youth rowing teams from Pacific Rowing Club and Saint Ignatius (both currently using the “old boathouse” at 1 Harding Road) have won multiple national championships in the past, and Lake Merced is the only location in the entire Bay Area that can host large regattas for high-school crews from San Francisco, Marin, the East Bay, and the Peninsula.

When I saw the proposed layout for the new boathouse that incorporates a small rental kiosk for kayaks and a small roundabout parking lot, it was clear that no rowers had been consulted in the design. The only analogy I could think of would be designing the Harding Park Golf Clubhouse without consulting a golfer! Rowing involves large numbers of participants and a wide range of boat sizes (from 60-ft long eight-person shells to 27-ft single-person sculls) with much larger space requirements than those envisioned in current plans. I have included some pictures and links from a recent rowing regatta on Lake Merced that drew thousands of athletes and spectators to give you a sense of the scale of rowing.

Pacific Invite Regatta – Lake Merced – March 12, 2022” (Eben Garnett [I-Garnett.1])

“Exercise and athletics are an important part of many San Franciscan's lives, mine included. We are fortunate to have many extraordinary public facilities in San Francisco to support our pursuits whether you are a weekend warrior, an Olympic contender or somewhere in between all year long.

Golfers have Harding Park, now a world-class golf course that hosts professional tournaments. **Tennis players** have the newly upgraded facilities in Golden Gate Park. **Swimmers** have Sava recreational pools and others that have been significantly improved over the past decade. **Runners** have Kezar Stadium to train on a recently resurfaced track. **Soccer players** have top-notch fields near Ocean Beach.

Now it's time to consider what the rowing community needs. The facilities are not up to par. Please pause to reconsider how today's daily users of Lake Merced fit into the EIR.

Maybe it's because we row before the sun comes up that you haven't noticed us there. But there is a vibrant community rowing at Lake Merced as shown in this Sunset Beacon story:

[Pacific Rowing Club Host Regatta on Lake Merced](#)

Just as SFRPD has considered the needs of other athletes -- runners, swimmers, golfers, tennis and soccer players, and others when it upgraded their athletic facilities, please consider the needs of the rowing community. I'd be happy to meet you any morning before work to row with you and show you how the facilities is used by youth and adults alike. I was hooked after the first stroke -- you might be surprised by how much you like it, too.

I want to echo the messages you've been receiving regarding the Lake Merced West site and the overlooked usage of the lake. Please invest in the planning now rather than spending more to fix it later. Talk to the stewards of the lake now who use it daily.

A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.” (Debra Holcomb [I-Holcomb.1])

“I began rowing on Lake Merced back in 1997 as a UCSF graduate student new to San Francisco. Moving here from the strong rowing community in Philadelphia, I found a welcoming community at the UCSF Rowing Club, especially in their indomitable leader, the legendary waterwoman Mary Allen.

Fast forward 25 years, and all four members of my household have rowed with SFRC and Pacific during the pandemic. My daughter and husband are avid PRC team members; the opportunity to practice with a women's team outdoors during Covid-19 restrictions was life- changing for my teen. I'm writing this letter of support for expanded boathouse facilities at Lake Merced so that generations of families can continue to enjoy this unique San Francisco treasure.

The current boathouse facilities are inadequate to support community mixed use of the Lake Merced waterfront. I would like to see the city create an accessible facility that supports rowing, SUP, kayaking, dragon boats, and outrigger canoe activities for San Franciscans of all ages, backgrounds, abilities, and means. An expanded boathouse would allow for community- building events that introduce more people to the lifelong joy of exercising on water. If you've never skimmed across the lake at sunrise, watching the stars fade, seeing the birds and fish wake up, I urge you to try it just once, and see why so many people enjoy this sport for life.” (Amanda Kahn-Kirby [I-Kahn-Kirby.1])

“Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

As opposed to the currently depicted concession stand, a rowing shell house has a different footprint and larger docking requirement which would require revisions or challenges to the EIR.

SFRPD's EIR document affirmatively excludes the prospect of a larger boathouse that would allow the rowing community to participate here. The SFRPD didn't earnestly consult with the rowing teams and we were led to believe in multiple community outreach meetings that the facility depicted would be changeable down the road.

Respectfully, please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.” (Mason Kirby [I-Kirby.1])

“Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do. I can assure you first hand that rowing makes an immense difference to the well being of teenagers.” (Ahmed Khaishgi [I-Khaishgi.2])

“Hello, my name is Emily Koenig. I am the Program Director at Pacific Rowing Club at Lake Merced. I represent all the rowing communities there, as they are here with us. The adult rowers are also involved. I've been involved in the rowing community at Lake Merced for 20 years. And, yes, that is over half of my lifetime.

And I would like to request a modification to the Lake Merced Draft EIR of the addition of a much larger aquatic center to the lower southeast side -- site where the former skeet fields and are located. I think Pacific Rowing Club in particular really shares the same objectives as the project and believe that we can fulfill a great portion of them. I was -- just a little bit about myself, I was born and raised in San Francisco in Bernal Heights. I went to Rooftop, Lowell, spent my summers at Camp Mater. I love my city. I also really love my program. And I just want to get rowing into as many people's lives as possible because I think it's a very true and honest sport. And I think it can benefit anyone no matter where you come from, who you are.

And I just want to see that happen, especially for the youth being able to get recruited to go to college. Like the doors open. Like I was recruited to UC Berkeley. It's incredible how much rowing changed my life. And I went right back to my rowing club to do that for others. I would say that this process, I've been feeling a little boxed out by not really knowing what's going on. And then having our comments not really be heard. And not knowing what we need to do.

Like, we are willing and able and we want to create a great community center at the lake and make Lake Merced a tremendous force. And we just need to be told what we need to do and we're ready to do it.” (Emily Koenig [I-Koenig_E.1])

“Supervisors, thank you so much for your time. My name is Leslie Lambert. I am currently a parent and rower and have been part of the PRC community for close to ten years at this point. I have a son who is now in college who went to the program in high school and it was absolutely life changing for him. It takes a lot of time to be a good rower. And it was wonderful that he was able to spend time in such a great place where physical health and team work are such strong values. I now have a second child who is in middle school at Marina Middle School who has joined the program and it's just been such a joy to see that over the past few years, not only has Pacific Rowing Club supported the high school rowers that they have a long history with, they expanded the program to support younger kids, who frankly don't have a ton of sports opportunities in middle school that are, you know, really (inaudible) and community based. And I just think it's such a special place. And in fact the middle school program at Pacific is incredibly robust and incredibly diverse. Much more diverse than the concert team that my child used to be part of. I also started rowing as an adult

about six months ago. And my coach Gavin was speaking earlier and I can just say -- you know, a middle-aged person in San Francisco, being able to have a place of community for myself and for the other group of adults has been, again, just so life changing opportunity. So I do really appreciate the support in the EIR and I really believe that the – future is really” (Leslie Lambert [I-Lambert-1.1])

“Dear Julie Moore,

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

Thank you for all the work you've done for the Draft EIR thus far.

As many in the rowing community have pointed out, the current plan is not sufficient to meet usage needs. As you know, the rowing community are frequent and respectful users of Lake Merced, and the vision for the future should properly contemplate the needs of this community, specifically with a larger facility than the one in the current plan.

Thank you for your consideration.” (Phil Luongo [I-Luongo_P.1])

“Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

The emphasis on a restaurant and concessions seems misguided and misspent - that footprint could be much better utilized by a boathouse or similar functions. And the revenue generation and meeting the needs of visitors to eat are better served by the increasingly common pattern of food trucks rather than the fixed infrastructure of a restaurant.” (Harrison Lynch [I-Lynch_H.2])

“Dear Julie Moore,

I expect you've recently heard from a number of members of the Lake Merced rowing community. Well I'm one more. :)

As others have surely emphasized, rowing is *the* major activity on Lake Merced, yet the current plans for the Lake Merced West site were made without requesting input from the rowing community. I ask that you please direct SFPRD to reconsider their plans for the site, and to work with the rowing community to address our needs. Specifically, we - and the greater San Francisco community - would greatly benefit from a new aquatic center sufficiently sized to accommodate growth.

If I may offer a personal anecdote... I learned to row at age 28, and it changed my life. I tried the sport on a whim by taking a class at Santa Monica College, drawn not just to the grace and physicality of the sport, but to the intense teamwork it demanded. I quickly learned that not only did I love the sport, I was pretty good at it. As a skinny academic, it was the first time in my life I considered myself an athlete. The sport fundamentally changed my perception of myself. I've since gone on to run a marathon and to bike from San Francisco to Los Angeles, challenges I wouldn't have dreamed of undertaking before I started rowing.

But the entire reason I pursued those other sports is that when I moved to San Francisco in 2003, there was no place where someone my age could participate in sweep rowing. (At that time, the clubs for adults on Lake Merced only accommodated sculling, which I had not yet learned.) Sweep rowing would have required me to travel to Marin, Oakland, or Redwood City, none of which were practical options given my work situation. So when Pacific Rowing Club introduced a new Masters (adults) program this past fall, I jumped at the opportunity to join. It's been a tremendous outlet for me, helping to get this 50-year-old body back in good physical and mental shape. (I can't overestimate how much the sport and the club have helped with coping with the COVID crisis these past months.)

So as a direct beneficiary of the Pacific Rowing Club's recent expansion, nothing would make me happier than to see the club expand further, benefiting others as it has benefitted me. A new aquatic facility on the Lake Merced West site is critical to that effort. I therefore ask for your support in promoting this proposal.” (David Milner [I-Milner.1])

“Julie Moore, The Public Notice for the Draft EIR indicates that "a new boathouse, boat dock and soft land area are proposed adjacent to the lake." In the zoom meetings Rec Park described a very small facility. Their project will certainly not meet the existing or booming growth demands of the rowing community for shell storage and related rowing areas.

I have reviewed numerous EIRs where the project is clearly delineated for environmental review. In those EIRs the project was described as to size, expected use objectives and environment parameters. In my opinion, the Rec Park boathouse description doesn't meet the standard for project evaluation.

I am concerned that the small Rec Park boathouse under EIR analysis will not adequately describe the potential for a larger rowing community boathouse.

*Will it require a supplemental EIR, requiring time and cost, should a decision be made at a later date to develop the rowing community's considerably larger boathouse?

*Should the rowing community's larger boathouse proposal be evaluated now in this EIR process?

Thank you for your response.” (Dick Morten [I-Morten.1])

“Good afternoon, commissioners. My name is Sam Nelson. I'm a 19-year member of the rowing community, not 20. Emily has me beat. I was born in San Francisco, I went to SI. I speak for myself here, but also as a part of the long alumni group of -- both teams have been here about 40 years.

I'm also a nurse at S.F. General in the ICU so I've been busy the last couple years, as you might imagine. I want to make one final note too in my own introduction, as part of my graduate studies, I have specifically

studied DEI efforts, but specifically in the sport of rowing. So bringing the sport to the widest population possible, not just people of color, people all of physical abilities is a heart's goal of mine. And I think San Francisco Lake Merced can really do that.

The current facilities, as you've heard, just don't allow us to do that. The proposed facilities and the plans simply don't provide that either. A 3,000 square foot place for paddle boards and kayaks are -- lose the vision of what this lake could provide for the community.

I would like to reiterate to something akin to a 14,000 square foot facility in that southern-most portion. Simple structure. Would provide future resources for adaptive rowing, veteran rowing, additional youth rowing, adult rowing, comprehensive programming.

As Supervisor Melgar just mentioned to me that the PUC has already agreed to move the arborist facility, which was a really big sticking point in our frustrations and concerns. So that sounds incredible. I just wanted to thank you for your time. It's a huge amount of work you have to do and that document is impressive. So thank you very much.” (Sam Nelson [I-Nelson.1])

“Dear Recreation and Park Commissioners,

I'm reaching out to echo a number of recent emails you've received regarding the Lake Merced West site. I too am part of the San Francisco rowing community, as a member of the Dolphin Club, and I was disappointed to learn that the SFRPD didn't meet or partner with the resident rowing organizations before developing plans for the Lake Merced West site. The resulting plans for the SE end of that property are alarmingly inadequate and uninformed, and are now part of the EIR process! Lake Merced has a long and storied tradition of hosting Junior and Master competitive and recreational rowers. Why doesn't the city of San Francisco care about these existing communities or have any interest in growing these communities?

Please stand with the rowing community that has been at the lake for generations. Please direct the SFRPD to work with the current users and stewards of Lake Merced: Pacific Rowing Club, Saint Ignatius High School, Dolphin Club and San Francisco Rowing Club to incorporate the teams' jointly-envisioned rowing center into the site-wide SFRPD plans that are part of the EIR process.

We envision a major rowing facility of national and international recognition, managed by the teams, built around essential indoor space for more boats, equipment, and support facilities. A complex for the southeast end of the property that efficiently uses the entirety of the land beyond the buildings to serve the widest range of San Franciscans. It will enable the teams to vastly increase the number of people they can serve and how they can serve them, especially traditionally-underrepresented populations and historically-underserved youth and adults.

Their vision includes more youth programming, additional adult recreational and competitive programs, adaptive and paralympic rowing (Veterans, recreational and therapeutic rowers, Olympic hopefuls, and those with developmental and acquired cognitive disabilities), strategic partnerships with local community groups, and general fitness programming for rowers and non-rowers alike. To be clear, the leadership of both the SI and PRC teams have publicly expressed these goals - even at City Hall.

The current facility at 1 Harding Road was not built to accommodate the expanding Jr. teams of SI's and PRC's. It is from a different era, where rowing was for a select few. The current teams fight against those old barriers of the 1950s, welcoming a diverse community of youth over 400 strong - but they are hobbled by

lack of room! They must turn people away due to lack of space for equipment, which hurts current participants too. The teams must store some of their existing boats outside where they degrade, the boat bays are prohibitively cramped, and the building and facilities have areas of major disrepair. The teams cannot reach their true vision of "rowing for all" without more room, and thus the activity's social, physical, health, mental, and emotional benefits remain out of reach for many. SFRPD's recently proposed plan does nothing to address any of this.

Thank you for continuing to oversee our incredible Rec and Park system, and I hope we can join together in a few years and celebrate the groundbreaking of an incredible new boathouse.” (Racheal Perry [I-Perry.1])

“The rowing community at the Lake is comprised of Juniors, Seniors, former Olympians, National Team hopefuls, and ordinary recreational enthusiasts. Rowing has been an active sport on the Lake for many years, and hundreds of rowers row several times a week. Although the existing boathouse and dock at 1 Harding Road is undersized and decrepit, the rowing community MANAGES to thrive. Why is that? Perhaps it is because every rower is an Amateur, in the best sense of that word. We all want to see Lake Merced maintained as a rowing venue, and as a vibrant recreational resource for all San Franciscans for years to come. Thank you for your consideration.” (William N. Post [I-Post.2])

“Good afternoon, planning commissioners. My name is Wes Powell and I'm a parent of a rower at PRC and rower myself. Long-time resident of San Francisco. I want to thank everybody for their work on this project because it is a terrific opportunity for San Francisco on the only body of water that we have that can -- can do some of these sports that we're talking about. We do have a lot of opportunities for tennis courts and basketball courts and parks, but only one place for water sports, which is a world class sport.” (Wes Powell [I-Powell-1.1])

“I'd like to note some points discovered and provided after attending a number of the EIR meetings on Lake Merced. From every indication, this EIR project appears to be railroaded/purposely on track to avoid and ignore public and community issues.

While we in San Francisco have only one place to Row and Dragon Boat in San Francisco, the EIR places more basketball courts and other park amenities which can be placed an ANY land not next to this body of water at Lake Merced. The entire Lake Merced area has numerous places for these land based, non-water related activities. Reviewing a map of the entire Lake Merced area, I can easily identify 20 acres of land (not used by the golf course) for these uses. This current EIR plan is as illogical as placing a BBQ and benches in the middle of a golf fairway, a children's jungle gym in the middle of Kezar Stadium, or a sewage treatment plant in the middle of Golden Gate Park. Dozens of citizens young and old from all socioeconomic backgrounds have voiced their request for a larger boathouse while not one citizen has asked for the other amenities currently planned (e.g. basketball courts and pic-nic tables).” (Wesley Powell [I-Powell-2.2])

“During the ‘community meetings’ a City representative planner explained that the scope and project “could be easily changed in the future, so it doesn't matter if a larger boathouse is proposed in the EIR on the site.

now.” However, this was a white lie/a placating remark by the EIR manager/speaker. It was clear in the Planning Dept Meeting last week that an EIR plan would be difficult to change in the future. Fortunately, a few of the Planning Commissioners and Supervisor Melgar specifically asked for the EIR to include an analysis for larger boathouse so it would not have to go through this process again. The EIR Speakers tried to placate the community and run the currently planned scope through knowing it would be an enormous if not impossible effort to make this change in the future. Shame on the leaders of the EIR and City Department for this attempt to pass through the community input with misleading half-truths. Kudos to the Planning Commissioners and Supervisor Melgar for calling this out and asking for a change.” (Wesley Powell [I-Powell-2.3])

“At a ‘community meeting’ the Lake Merced Property Manager said that the current boathouse is sufficient and therefore another larger boathouse for rowing is not needed. She is completely wrong, sounded angry at our concerns, and I’m surprised at the lack of knowledge of the needs of the constituents. The current boathouse does not meet the demand or needs of the community. There are 5 different clubs packed into the current facility, severely limiting the recreational services potential for San Franciscans. I asked a few rowing club leaders if the City Property Manager ever discussed this with them, and the answer is no. How can a Property Manager not want to understand what the community stakeholders want and actively ignore them? She should be an advocate, which she apparently is not. This would never happen in a customer focused business of government.” (Wesley Powell [I-Powell-2.4])

“I started rowing in 1990. Stopped. Didn't have a chance to pick up an oar until last year. And what I can tell you is that we have a once-in-generational opportunity to change the face of rowing. Nothing has changed in rowing from my perspective over the last 30 years, since I last picked up an oar. We were in San Diego, lot of very similar faces, lot of very similar tribal contingencies with regard to teams. I think the sport of rowing has an opportunity to change the nature of the sport and the ability for people to participate in it at different levels. I will tell you that I support the EIR in its full capacity. But as everyone has mentioned before, there are some key architectural distinctions that would make a boathouse that is slightly larger, much more functional, and much more inclusive. So the reason why I'm in my pajamas and unshaven is I actually read the 800-page EIR report this morning and said: Hey, I get to see you in person. Let's do it. So, I appreciate your time. But specifically, the exclusion of the larger boathouse in consideration in Section 563 got me up out of bed this morning to share my comments with you today.” (Rich [I-Rich.1])

“I am here to echo the many comments being generated by the rowing programs on Lake Merced who think the existing EIR for the redoing of the old gun range property badly misses the mark in terms of creating a world-class site in San Francisco for all forms of rowing - high school, college, recreational, geriatric etc.

My son in the late 1980s had the athletic experience of his youth coxing PRC boats for three years. He was joined in that joyous activity by hundreds of other SF youth and many hundreds of other visiting rowers from around the state. The redoing of the site across the lake from the current “boathouse” for PRC and SI offers a once in a lifetime opportunity to create a new, updated and spacious setting for rowing that should in very little time draw many hundreds of additional rowers to Lake Merced and the City - a VERY good thing and much better than a space to sell trees and flowers.

Please listen to the active, vibrant voices of the local rowing community when it come to finalizing the EIR. Dave Tucker and Pat Tucker (full time residents of SF since 1970 and full time supporters of SF high schools and their sports and rowing teams)” (David Tucker and Pat Tucker [I-Tucker.1])

“I want to echo what's been said before and thank you all very much for all the work you put into this project. It is so important to us, which is why you've seen the huge groundswell of community support here for this. I just wanted to reiterate what's people have been saying, which is the space on the lot for a larger boathouse is insufficient. And I also wanted to add that the community of not just PRC, but also St. Ignatius and S.F. Rowing Club and Dolphin Club, the rowing community in San Francisco has grown to become so vast and vibrant in the past decades that we're more than willing to leverage our community and -- in order to create a groundswell in order to help push any new project happen through financially.

We're not depending on the city. We're not asking for any major boathouse to be built by you. We're just asking for the space to be allotted for us to raise the project to build our boathouse ourselves. Because that's the most important thing for us is to give us the space to expand our community organically. And to use this beautiful lake to expand the rowing community throughout the entirety of San Francisco.” (Christian Wawrzonek [I-Wawrzonek.1])

“Dear Julianne Moore, Senior Project Manager:

Having read the proposal for the development of the old Pacific Gun Club site, I am astonished that there is no mention of the current and historic uses of the lake itself. Nor how the multiple recreation opportunities envisaged will affect the health of the lake as well as is current uses.

The lake is home to several rowing clubs and the home base for middle school and high school rowing teams. A new masters rowing program started this year. A competitive rowing regatta for kids in March saw 300 boats on the lake in a single day!

As a member of the San Francisco Rowing Club who rows at Lake Merced two or three times a week year round, I ask you to incorporate the active rowing community in your development plans.” (Penni Wisner [I-Wisner.1])

“2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR. 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.”(This comment is representative of the following comments received via email between February 23, 2022, to April 11, 2022, which are similar or identical to the representative comment: I-Austin.2, I-Aviva.2, I-Casement.2, I-Caliandro.2, I-Chen.2, I-Cho.2, I-Carman_E.2, I-Carman_I.2,I-Downey.2, I-Eigers.2, I-England.2, I-Foster.2, I-Gabalda.2, I-Gelman.2, I-Griffith.2, I-Hagiwara.2, I-Harrington.2, I-Harris.2, I-Johansen.2, I-Johnson-1.2, I-Johnson-2.2, I-Koenig_P.2, I-Lambert-2.2, I-Lynch_S.2, I-McGahey.2,

I-McManus.2, I-Miller.2, I-Paul.2, I-Petitt.2, I-Rosen.2, I-Rosenblum_K.2, I-Rosenblum_S.2, I-Ruiz.2, I-Sanders.2, I-Smith.2, I-Scott.2, I-Vasquez.2, I-Vaughan.2, I-Yeh.2)

“I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you’ve been receiving regarding the Lake Merced West site.

Thank you for all the work you’ve done for the Draft EIR thus far.

1. – The plans in the Draft EIR continue to include a highly insufficient watercraft facility that falls short of the known needs and vision of the community. Existing and foreseeable future recreational demand is not adequately provided for, at the current boathouse at 1 Harding Rd or through the plans in the EIR, and the EIR’s proposed plans would not add suitable water-oriented recreational facilities to the lake.
2. – Please replace the plans being used by the EIR with ones that incorporate the rowing community’s jointly-created vision for the southeast portion of the site. Have the much larger facility be the primary plan in the EIR, not a discarded alternative. Include rowing leaders – those who know the sport – in the planning process.
3. – A new, much larger boathouse will make a difference in the lives of thousands of adults and young people of all backgrounds and abilities every year. The current boathouse at 1 Harding Road already cannot adequately serve the 400+ youth and adult rowers at the lake.
4. – The desperately-needed facility is essential for the community’s joint vision of rowing at Lake Merced, one that not only expands youth rowing opportunities, but provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. It will be a true community center, one that provides a welcoming and engaging atmosphere for people of color and those who are traditionally underrepresented in the sport.
5. – The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport can develop and strengthen the mind and body of all who want to participate. It provides considerable pathways for advancement towards college if desired, and for a healthy and fulfilling life. Help the rowing community change lives, and please recognize the legacy, vision, and expertise that the teams bring to the table.”(This comment is representative of the following comments received via email between February 23, 2022, to April 11, 2022, which are similar or identical to the representative comment: I-Blee.1, I-Boyd.1, I-Callahan.1 I-Keene.1, I-Li.1, I-Luongo_H.1 I-Matsumura_D.1, I-Matsumura_R.1, I-McNulty.1, I-Niclas.1, I-O’Neill, I-Panasik.1, I-Paras.1 I-Walti-1.1, I-Walti-2.1, I-Will.1)

RESPONSE PD-2

The comments above recommend changes to the project analyzed in the draft EIR to include a larger boathouse at the project site. These comments are acknowledged, although they do not address the adequacy or accuracy of the EIR impact analysis. However, in light of these comments, the San Francisco Recreation and Parks Department (RPD) is considering a larger boathouse for the site after consultation with

the rowing community. Refer to Chapter 8, Project Variant, for a description of the larger boathouse variant and associated evaluation of environmental impacts.

Comment PD-3: Project Implementation

Response PD-3, p. 10.2-22, addresses the following comments, which are quoted below:

A-HPC.4, A-HPC.5, A-Imperial.4, A-Moore.6, A-Moore.7, I-Moreland.1

“Commissioner Foley suggested the use of QR codes as a way to provide access to interpretive displays around the site.” (San Francisco Historic Preservation Commission [A-HPC.4])

“HPC Comments on the Proposed Project

- Commissioners expressed their support for the proposed project that would open up the site to a much wider audience than its existing closed state and previous use as a shooting range.
- Commissioner Nageswaran expressed her concern about the timing of the phasing of the project and said it would be regretful if the site were to be demolished only to not find a concessionaire for the site.
- Commissioner Black expressed her support for the design direction of the proposed project.” (San Francisco Historic Preservation Commission [A-HPC.5])

“So in this, for me, I would emphasize on the open space and recreational use of this area than the restaurant use. Thank you.” (Theresa Imperial, Commissioner, San Francisco Planning Commission [A-Imperial.4])

“And I would like to actually deemphasize the entrepreneurial part of this open space, but rather the open space opportunities involved. Those would be impact recreational opportunities that do not require a larger restaurant to make it happen.” (Kathrin Moore, Commissioner, San Francisco Planning Commission [A-Moore.6])

“There are concerns about the commercialization of the site, including that Rec and Park seems to hint that this can only happen if they find a concessionaire. That concerns me because there is concern that the facilities at the restaurant and the numbers of people that are expected at this site make it too much of enterprise that can only be supported by certain segments of the population, but not by everybody. I would like to really see a closer analysis of what is really expected, even cost data of what is required to make the survival and successful enterprise.” (Kathrin Moore, Commissioner, San Francisco Planning Commission [A-Moore.7])

“I am writing in support of the net Lake Merced West Project. I appreciate and support your position that the site needs to be cleared of all the old shotgun buildings. I also support the project objectives outlined in section 2.3 and want to see them fulfilled.

As a Local Business Enterprise who is familiar with the city of San Francisco's recreational infrastructure and a member of the Pacific Rowing Club I am very familiar with Lake Merced as an asset to our community. The proposals for a Multi-use Aquatic Center will maximize the asset of Lake Merced in a way that is environmentally balanced. This enhancement should be done in a way with outreach and inclusivity similar to the new golden gate tennis center's learning center with transportation and afterschool academic programs. See the strategic plan for Boston's Community Rowing Inc (CRI) for a great model of what can be with the correct infrastructure.” (Chip Moreland [I-Moreland.1])

RESPONSE PD-3

Comment A-HPC.4 suggests the use of QR codes for interpretive displays at the project site. As discussed in draft EIR section 3.2, Historical Architectural Resources, Mitigation Measure M-CR-1c: Interpretive Program (p. 3.2-31) is required to address the significant and unavoidable impact to historic architectural resources within the project site with the specific aim of educating the public about the history of the project site. As stated in the mitigation measure, the interpretative plan should also explore contributing to publicly accessible digital platforms and the project sponsor and planning department will determine if QR codes or similar technology will best meet that goal as part of the development of the interpretative program.

Comments A-Imperial.4, A-Moore.6, and A-Moore.7 recommend the project should deemphasize restaurant or enterprise use and emphasize the recreational and open space uses. Comment A-Moore.7 also expresses concern regarding the project development viability and requests financial information about the project. Comment I-Moreland.1 states that an aquatic center would maximize the value of Lake Merced for recreation in a way that is environmentally balanced. The project's general site layout, variety of recreational facilities, and concession operator model reflect RPD's understanding of community interests, the long-term operation and maintenance of the site, and the project's objectives. As stated in draft EIR section 2.3, (p. 2-6) the project objectives include the following: creating a recreational facility that enhances the unique waterfront setting to encourage public use and enjoyment of open space for visitors of all ages, fitness levels, and experience; developing the site to maximize scenic lake views and facilitate access while retaining open spaces; providing flexible use of a large, 11-acre site in the southwest quadrant of San Francisco with a range of recreational activities to serve diverse users throughout the region and accommodate groups of various sizes; providing an accessible and welcoming environment for all parkgoers regardless of what amenity they plan to experience; and constructing and operating an economically feasible recreation facility that sustains its long-term operations and maintenance.

Comment A-HPC.5 expresses support for the project but also notes that it would be regrettable if the existing buildings were demolished only to not find a concessionaire for the site; however, such an outcome would not result in new or more severe significant impacts beyond those identified in the draft EIR.

In accordance with the California Environmental Quality Act (CEQA), the EIR evaluates the physical environmental effects of the project and does not discuss financial considerations. Comments expressing

support for or general opinions about the project do not raise specific issues concerning the adequacy or accuracy of the EIR's evaluation of physical environmental impacts. However, such comments, including recommendations for project modifications, may be considered and weighed by the decision makers as part of their decision to approve, modify, or disapprove the project.

Comment PD-4: Project Objectives

Response PD-4, p. 10.2-24, addresses the following comments, which are quoted below:

A-HPC.6, O-CNPS.2

“General Comments

- Commission President Matsuda requested that commissioners go on site visits in instances where the site has been closed off to the public for an extended period of time.
- Commission President Matsuda suggested that a project objectives include acknowledging and interpreting the site's history and significance.” (San Francisco Historic Preservation Commission Letter [A-HPC.6])

“San Francisco's Biodiversity Resolution called for² establishing local biodiversity as a citywide priority, with a framework for inter-agency collaboration for nature based initiatives.” This SFPUC and SFRPD site should be planted only with local, native plants. CNPS Yerba Buena encourages the removal of non-native invasive species and replacing these by planting, monitoring and supporting local, native species in their place. Lake Merced has 111 non-native plant taxa.³ The project map depicts Eucalyptus and Himalayan blackberry, Italian Thistle and Ice plant; here are opportunities for replacing these exotic species with local, native plants.

The EIR should address how this project and the proposed recreation will protect the native plant species at Lake Merced (See appendix attached and on our letter dated July 9, 2021 for a list of plants).”

² <https://sfbos.org/sites/default/files/r0107-18.pdf>

³ <https://www.wood-biological.com/san-francisco-plant-checklist/annotated-checklist-3rd-edition/>”

(Eddie Bartley, President Paul Bouscal, Vice President; Beth Cataldo, Volunteering; Sophie Constantinou, Secretary; Elliot Goliger, Horticulture; Bob Hall, Treasurer; Libby Ingalls, Newsletter Production; Susan Karasoff, Outreach; Susan Mullaney, Plantsgiving; Jake Sigg, Conservation; Noreen Weeden, Programs; California Native Plant Society [O-CNPS.2])

RESPONSE PD-4

Comment A-HPC.6 suggests project objectives for projects affecting historical resources should include acknowledging and interpreting the site's history and significance. As discussed in the response to Comment PD-2: Boathouse and rowing, draft EIR section 3.2, Historical Architectural Resources, Mitigation Measure M-CR-1c: Interpretive Program (p. 3.2-31) is required to address the project's significant and unavoidable impact to historic architectural resources within the project site with the specific aim of educating the public about the history of the project site. Response PD-3, above, discusses RPD's objectives for the Lake Merced West project, which are based on its understanding of community interests. In addition, the comment recommends that the HPC tour project sites that have been inaccessible to better understand the affected historic resource. These comments do not raise specific issues concerning the adequacy or accuracy of the EIR's evaluation of physical environmental impacts. However, such comments, including recommendations for project modifications, may be considered and weighed by the decision makers as part of their decision to approve, modify, or disapprove the project.

Comment O-CNPS.2 encourages the protection and planting of local, native plant species at the project site. Impacts of the project on special-status species, including plants, are evaluated in draft EIR Appendix A section E.15, Biological Resources (p. 97). The draft EIR concluded that impacts on special-status plants would be less than significant. Response BI-1 (Section 10.8) clarifies the draft EIR's special-status plant impact analysis. Draft EIR Chapter 2, Project Description, discusses proposed landscaping of the site. The description of proposed landscaping has been revised as follows to clarify the types of vegetation proposed:

LANDSCAPE FEATURES

Landscape restoration work was completed throughout the site as a part of the soil remediation project and would be retained as part of the Lake Merced West project where feasible. New trees, shrubs, and other vegetation would be planted along John Muir Drive, adjacent to the pedestrian entry and exits, and at selected locations within the project site (west of the community building, near the boathouse loading area; refer to Figure 2-3). All new vegetation would be native to California. Some permanent vegetation and tree removal would occur in areas of new facilities or at site entrances, mainly in upland areas, and other existing vegetation disturbed during construction would be replaced upon completion of construction. An open metal fence that provides views through the site would be installed along the project boundary adjacent to John Muir Drive.

10.3 Alternatives

The comments and corresponding response in this section cover the topics addressed in draft EIR Chapter 5, Alternatives.

Comment AL-1: Alternatives Analysis

Response AL-1, p. 10.3-2, addresses the following comments, which are quoted below:

A-HPC.2, A-Moore.3, A-Moore.8

“The HPC agreed that the DEIR analyzed a reasonable and appropriate range of preservation alternatives to address historic resource impacts.

- Some Commissioners expressed a preference for the Partial Preservation Alternative as it was closer to the proposed project. Commissioner Black expressed a preference for the Partial Preservation Alternative as it met more of the programmatic objectives of the proposed project. Commissioner So appreciated how the Partial Preservation Alternative accommodated elements of the proposed project through adaptive reuse of some of the contributing buildings on the site.
 - Other Commissioners preferred the Full Preservation Alternative given the unique nature of the site. Commissioner Nageswaran expressed her preference for the Full Preservation Alternative as it retained more original features of the complex while Commissioner Wright acknowledged that the Full Preservation Alternative was the only alternative that reduced impacts to a less-than-significant level (aside from the no project alternative).
 - Commissioner Wright was curious to know why the Shell House was not incorporated within the preservation alternatives and wondered if it would be possible to construct an addition to the rifle range building in one of the alternatives.” (San Francisco Historic Preservation Commission, [A-HPC.2])
-

“Going from there, I saw the comments on full, partial, preservation alternatives and no-project alternative. I don't want to get into detail, but let the EIR sort out how we can minimize impact and maximize nondisruptive uses -- reuses of the site.” (Kathrin Moore, Commissioner, San Francisco Planning Commission [A-Moore.3])

“One ask I have about EIR is I found it more difficult to read through the alternatives without having the pictures which describe them right next to them. In other EIRs, we have mostly a matrix that at the top shows in small vignette form what the alternative is and then in column form the summary of impact and mitigation measures. In this particular case, we have things very much strung together and you have to go back and forth in order to get to the imagery which explains which alternative you're exactly looking at. And since the differences between these alternatives are more for the informed user of the site rather than those who read this for the first time, it gets kind of more difficult to get into the subtleties of what the impacts are

and what the mitigation measures are that are accompanying them.” (Kathrin Moore, Commissioner, San Francisco Planning Commission [A-Moore.8])

RESPONSE AL-1

Comment A-HPC.2 summarizes comments from multiple members of the Historic Preservation Commission who weighed the merits of the different alternatives. Commissioner Wright discusses possible inclusion of the Shell House and an addition to the rifle range building as part of the partial preservation alternative. As discussed in draft EIR Chapter 5, Alternatives, p. 5-1, the planning department, RPD, and San Francisco Public Utilities Commission (SFPUC) explored several different approaches to the alternatives that considered the location, condition, and building type of the contributing buildings on the project site. The condition, location, and property type of the Shell House is such that it would be difficult to incorporate within a feasible alternative and, for this reason, it was not retained as part of any of the alternatives. The planning department determined that the relationship between buildings and skeet fields was important to retain in a preservation alternative; therefore, it selected preservation alternatives that would both retain the spatial relationship and include those contributing buildings that could be adaptively reused without having to construct additions to the existing buildings. As discussed in CEQA Guidelines section 15126.6(f), an EIR is not required to consider every conceivable alternative to a project and should analyze a reasonable range of alternatives. As noted in the comment, the Historic Preservation Commission agreed that the draft EIR analyzed a reasonable and appropriate range of preservation alternatives to address impacts on historic resources. Refer to draft EIR Chapter 5, Sections 5.2.3, 5.3, and 5.6 for discussion of the range of alternatives considered for the project.

Comment A-HPC.2 also expresses general preferences for or against the proposed project or project alternatives. General comments expressing a preference for an alternative by weighing its merits in comparison with the other alternatives or the proposed project do not raise specific issues concerning the adequacy or accuracy of the draft EIR. Preferences for the project or a particular alternative may be considered and weighed by decision makers as part of their decision to approve, modify, or disapprove the project.

Comments A-Moore.3 and A-Moore.8 discuss the use of the draft EIR alternatives analysis in specifying how the alternatives minimize impacts and maximize reuse of the site, and recommend relocating the figures of the alternatives such that they are easier to compare. In response to these comments, to clarify and amplify the comparison of the project and alternatives, draft EIR Table 5-1, p. 5-5, has been revised to include diagrams of the alternatives, as shown on the following page. These revisions do not alter the elements of the alternatives or the conclusions of the alternatives impact analysis.

Table 5-1 Comparison of the Project and Alternatives^a

Project Component/Structure	Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
Existing Clubhouse	Demolish	Retain and secure to prevent unwanted entry, same as current conditions	Rehabilitate to Secretary's Standards ^{bE}	Rehabilitate to Secretary's Standards
Rifle Range Building	Demolish		Rehabilitate to Secretary's Standards	Demolish
Caretaker's House	Demolish		Rehabilitate to Secretary's Standards	Rehabilitate to Secretary's Standards
Shell House	Demolish		Demolish	Demolish
Skeet Fields 4-7 and Associated Elements (high and low houses, safety fences)	Repair skeet field 4; demolish all high/low houses and other skeet fields		Retain all four skeet fields and use as open space; retain all safety fences and high/low houses	Retain two of the four skeet fields and use as picnic or open space areas; retain high/low houses and the safety fences associated with skeet fields 4 and 7
Contributing Features Retained ^{ab}	Less than 1	8 of 8	7 of 8	4 of 8
Approximate Building Square Footage Retained	None	8,910 square feet	6,550 square feet	3,920 square feet
New Buildings— Total Number/Gross Square Feet	5/Approximately 16,300 square feet	0/0 square feet	3/Approximately 7,800 square feet	4/Approximately 12,800 square feet
Range of Site Uses	<ul style="list-style-type: none"> Community building Restaurant with patio and terrace Open space Boathouse, dock, soft landing City arborist office and yard Skate park, ropes course, and restrooms Sport courts (2-3) Playground Picnic areas 	Equipment storage Site would be closed to the public	<ul style="list-style-type: none"> Community building (smaller) Restaurant (smaller), no patio or terrace Open space Boathouse, dock, soft landing City arborist office and yard Skate park, ropes course, and restrooms Sport courts (2) 	<ul style="list-style-type: none"> Community building (smaller) Restaurant, no patio or terrace Open space Boathouse, dock, soft landing City arborist office and yard Skate park, ropes course, and restrooms Sport courts (2) Playground Picnic areas

NOTES:

^a Refer to Figures 3.2-6, 5-1, 5-2 and 5-3 for full-scale versions of the images shown.

^{ab} Contributing features are site features that add to the historic associations, historic architectural qualities, or archeological values for which a property is significant. Refer to Figure 5-1 (p. 5-7) and Table 3.2-2 in Section 3.2, Historical Architectural Resources (p. 3.2-17), for additional information about contributing features.

^{bE} The Secretary's Standards are the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings.

SOURCE: Data compiled by Environmental Science Associates in 2021

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10.4 Aesthetics

The comments and corresponding response in this section cover topics in draft EIR Appendix A, Section E.2, Aesthetics.

Comment AE-1: Aesthetics

Response AE-1 addresses the following comments, which are quoted below:

A-CCC.6, A-Moore.11, A-Tanner.4

“Related to the Visual Impact Assessment (Impact AE-1 and AE-2), please provide more analysis of the potential visual impact on the character of the Lake Merced Area, including more visual simulations, such as a simulation of what the proposed project might look like from boaters on the lake, and a description of how the design is intended to blend with the natural character of the area. While it appears that there will be no large buildings or other structures in the proposed project, it will still be important to analyze the impact of the new structures that will be added, such as the restaurant, boat houses and dock, and playground.” (Peter Benham, North Central Coastal Planner, California Coastal Commission [A-CCC.6])

“The view of the city at night should be less illuminated in this part of the city and basically reflect the open space that it really represents. So, I would like to put this to record as it deals with the restaurant and night use and excessive lighting.” (Stanley Moore, Commissioner, San Francisco Planning Commission [A-Moore.11])

“I will add my voice to support that comment, thinking about the directionality and intensity of lighting for the park at night.” (Rachael Tanner, President, San Francisco Planning Committee [A-Tanner.4])

RESPONSE AE-1

Comment A-CCC.6 requests additional analysis of the potential visual impact on the character of the Lake Merced Area, such as additional visual simulations and descriptions. Draft EIR Appendix A, Section E.2, Aesthetics (p. 16), evaluates the impacts of the project on aesthetics and includes two simulations of the project from public viewpoints. Views in this section depict the existing visual conditions of the project site and document the range of visual conditions seen by the public, including locations from pedestrian trails, the boathouse, and other nearby publicly accessible areas. As discussed in Section E.2, p. 16, the dominant characteristics defining visual quality in the project area are the expanse of Lake Merced, lower vegetation along the shoreline, taller vegetation defining the skyline, and wide views of the sky. New structures would be located more centrally onsite than current structures, and the height of the structures would not exceed the height of trees that define the skyline in the project area. The project would not alter the existing dominance of the lake expanse and shoreline vegetation, given the relative scale of the structures compared

10. Responses to Comments
10.4 Aesthetics

to the surrounding vegetation and the lake. Boating uses at Lake Merced include competitive rowing and fishing. During competitive rowing, boaters generally travel along the length of the lake and past the project site. Generally, the views of competitive rowers passing along the site are defined by motion as they focus on their travel path. Similarly, people fishing would generally be focused on fishing and not on the lake for the purpose of viewing the shoreline. While boaters see portions of the project site from the lake, these views are generally fleeting and indirect, and partially obstructed by topography and vegetation.

Draft EIR Appendix A Figure 8 (p. 25) shows views toward the project site over the open water from the Lake Merced Boathouse under existing and proposed conditions. While boaters on the lake would be closer to the site, the same dominant characteristics of visual quality would be present when viewing the site from the lake, although the Lakeview Apartments (approximately seven stories tall) would be more prominent in the view from the lake when compared with views from the surrounding shoreline. As shown in draft EIR Figure 2-4 (p. 2-11), the project site slopes gently downhill from John Muir Drive to the lake. The tallest building proposed onsite would be 25 feet above grade. In the vicinity of the restaurant and boathouse, John Muir Drive is at approximately elevation 25–30 feet. The boathouse would be constructed at an elevation of between 10 and 15 feet, and, as discussed in draft EIR Appendix A, Section E.2, p. 27, the relative size of the shoreline where vegetation would be removed is small compared with areas of undisturbed vegetation on the site and in surrounding shoreline areas. Given the sloping topography of the project site; the height of the proposed buildings, including the boathouse; and the height, prominence, and position of the existing Lakeview Apartments, the project would not substantially degrade the existing visual character or quality of public views of the site from the lake. Because draft EIR Appendix A Figure 8 (p. 25) represents a view across the open water of the lake to the project site, another simulation is not needed to support the draft EIR's impact conclusion.

Comments A-Moore.11 and A-Tanner.4 express concern regarding nighttime illumination from the project site. As described in draft EIR project description Section 2.7.3, Lighting and Security, the only permanent exterior lighting would be safety lighting for evening and nighttime illumination in parking areas, along main pedestrian walkways, and around buildings. No recreational lighting would be provided and the lighting and buildings onsite would be consistent with the city's Standards for Bird-Safe Buildings (San Francisco Planning Code section 139), which require minimal lighting shields on lighting, and prohibit up lighting or event searchlights. Impact AE-4 in draft EIR Appendix A, p. 31, discusses the aesthetic effects of the proposed night lighting and concludes that nighttime lighting would not substantially affect nighttime views and aesthetic impacts of the lighting would be less than significant. Impact BI-4 in draft EIR Appendix A, p. 119 discusses potential impacts on avian migration from nighttime lighting and similarly concludes that project impacts would be less than significant.

10.5 Tribal Cultural Resources

The comments and corresponding response in this section cover topics in draft EIR Appendix A, Section E.5, Tribal Cultural Resources.

Comment TC-1: Tribal Cultural Resources

Response TC-1 addresses the following comments, which are quoted below:

A-HPC.1, A-HPC.3, A-Moore.2

“The HPC found the analysis of historic resources in the DEIR to be accurate. Although the HPC understands the period of significance relates to the history and use of the site by the Pacific Rod and Gun Club, Commissioners wanted to acknowledge the site’s prior use and significance to the wider community, for example the Ramaytush Ohlone. This is in line with the HPC’s priority of reviewing issues through a racial and social equity lens.” (San Francisco Historic Preservation Commission [A-HPC.1])

“The HPC expressed the importance of having the mitigation measures also tell the stories of the Ramaytush Ohlone as part of the larger social and cultural history of Lake Merced. Commission President Matsuda reinforced the larger cultural stories that could be told about this site as a significant cultural landscape were important and would be in line with the HPC’s resolution centering racial and social equity.” (San Francisco Historic Preservation Commission [A-HPC.3])

“My second group of comments is in appreciation of historic preservation and the incredible comments they did in a letter that we were copied on this morning. Most, and foremost, I want to support and add the reviews the cultural lens into our group of responses. The fact that Ohlone are indeed the original historic occupants of this land has not been sufficiently treated in the EIR. And historic preservation to expand on the objectives and acknowledging and interpreting the site’s history with respect to that particular element is extremely important and I would hope that all of us embrace that particular thought.” (Kathrin Moore, Commissioner, San Francisco Planning Commission [A-Moore.2])

RESPONSE TC-1

As discussed in Draft EIR Chapter 3.2, Historical Architectural Resources, p. 3.2-1, during the environmental review for the soil remediation project (a previous project at the same site),¹ the San Francisco Planning Department (planning department) determined the property to be eligible for listing as a *cultural landscape* in the National Register of Historic Places and the California Register of Historical Resources. The cultural

¹ San Francisco Planning Department, *Pacific Rod and Gun Club Upland Soil Remedial Action Project Final Mitigated Negative Declaration*, Case No. 2013.1220E, October 23, 2014.

landscape associated with the Pacific Rod and Gun Club was therefore the focus of draft EIR Chapter 3.2, Historical Architectural Resources. Draft EIR Appendix A, Section E.5, Tribal Cultural Resources, considers the effects of the project on *tribal cultural resources*, which are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are listed, or determined to be eligible for listing, on the national, state, or local register of historical resources.

As discussed in draft EIR Appendix A, Section E.5, Tribal Cultural Resources, p. 40, the planning department contacted Native American individuals and organizations in the San Francisco area, providing a description of the project and requesting comments on the identification, presence, and significance of tribal cultural resources in the project vicinity. No Native American tribal representatives contacted the planning department to request consultation on the project. As discussed in draft EIR Appendix A, Section E.4, Cultural Resources, p. 36, there are no known prehistoric archeological resources at the project site; however, the potential exists for the project to affect previously unrecorded buried prehistoric archeological resources, which are considered to be tribal cultural resources based on previous consultation and outreach with California Native American tribes. Potential impacts on unrecorded buried Native American archeological resources were determined to be less than significant with implementation of San Francisco Public Utilities Commission and San Francisco Recreation and Parks Department standard construction measures (included in draft EIR Appendix C) for inadvertent discovery of archeological resources and development and implementation of an archeological monitoring program, including requirements for notification and coordination with associated Native American tribal representatives upon discovery of Native American archeological resources, which are considered to be tribal cultural resources and no mitigation measures were required. Implementing the standard construction measures would ensure that any potential archeological tribal cultural resources encountered during construction excavation would be promptly recognized, appropriately treated, and, if applicable, subject to an interpretive program developed in consultation with the associated Native American tribal representatives. Pursuant to CEQA Guidelines section 15126.4(a)(3), mitigation measures are not required for effects that are not found to be significant.

As discussed in draft EIR section 3.2, Historical Architectural Resources, Mitigation Measure M-CR-1c: Interpretive Program (p. 3.2-31) is required to address the significant and unavoidable impact to historic architectural resources within the project site. The interpretive program's goal is to educate visitors about the property's historic themes, associations, and lost contributing features within broader historical, social, and physical landscape contexts. Where appropriate, planning department preservation staff require inclusion of local California Native American history and cultural traditions as part of an interpretive program for historical resources. To clarify that the mitigation measure includes the local Native Americans as part of the larger social and cultural history of Lake Merced, the following text change is proposed:

Mitigation Measure M-CR-1c: Interpretive Program

The RPD and the SFPUC shall facilitate the development of an interpretive program focused on the history of the project site as a recreational shooting range. The interpretive program should be developed and implemented by a qualified preservation professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner. Coordination with local artists and interested parties, including local California Native American representatives, should occur, as feasible. The primary goal of the program is to educate visitors about the property's historical themes, associations, and lost contributing features within broader historical, social, and physical landscape contexts, including its longer and more expansive history and association with Lake Merced as a recreational and agricultural site used by many people over time, including the

Ramaytush Ohlone. One possible location for interpretation would be the skeet field that is to be retained and reused as a picnic area.

This program shall be initially outlined in a proposal for a Historic Resources Public Interpretive Plan subject to review and approval by planning department preservation staff. The plan shall include the general parameters—substance, media, and other elements—of the interpretive program, which shall include in publicly accessible areas of the project site a permanent display(s) of interpretive materials concerning the history and architectural features of the historical resource (both the site as a whole and the individual contributing buildings and features). The interpretive plan should also explore contributing to publicly accessible digital platforms.

The detailed content, display materials, and other characteristics of such an interpretive program shall be reviewed and approved by planning department staff before the issuance of a Temporary Certificate of Occupancy.

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10.6 Transportation and Circulation

The comment and corresponding response in this section cover topics in draft EIR Appendix A, Section E.6, Transportation and Circulation.

Comment TR-1: Transportation and Circulation

Response TR-1 addresses the following comment, which is quoted below:

A-Moore.9

“I spoke about access and car parking. In the absence of public transportation, are there remote parking lots from which people then could take their bike or shuttle? I have not seen a transportation analysis of this kind and would like to have more answers. The document is rather large and I may not have looked at everything. But those are, I think, in summary, the points that I would like to add to this discussion. Thank you.” (Kathrin Moore, Commissioner, San Francisco Planning Commission [A-Moore.9])

RESPONSE TR-1

Parking impacts were not evaluated in the draft EIR. As discussed in the project’s Transportation Analysis Memorandum (draft EIR Appendix E), the *San Francisco Transportation Impact Analysis Guidelines for Environmental Review* establish screening criteria to determine whether a project could result in secondary impacts caused by a substantial vehicular parking deficit. If a project is located within the planning department’s map-based screening area,¹ then a substantial vehicular parking deficit would not occur and a vehicular parking analysis is not required. The project site is located in Transportation Analysis Zone 401. Retail is presented as a proxy for the project’s recreational uses for map-based screening. For Transportation Analysis Zone 401, existing daily vehicle miles traveled per capita is 26 percent below the regional average daily vehicle miles traveled per capita, and projected 2040 daily vehicle miles traveled per capita is 15 percent below the 2040 regional average daily vehicle miles traveled per capita. Because the project is within a map-based screening area, a secondary parking analysis was not required. The proposed project would result in less-than-significant project-level and cumulative impacts associated with vehicular parking.

Because a parking analysis was not required to evaluate the project’s potential transportation and circulation impacts, the availability or use of offsite parking facilities was not considered. However, for informational purposes it is noted that there are parking areas around Lake Merced such as at Sunset Circle, Lake Merced Boathouse, and TPC Harding Park, as well as a proposed parking area near Skyline and the Great Highway as part of the Ocean Beach Climate Change Adaptation project, and a multi-modal trail around the lake connects these areas to the project site. Note that, as shown in the travel demand estimates provided in draft EIR Appendix A, p. 44, Tables 2 through 4, multimodal access is provided to the project site, meaning that not all visitors would need to drive and park onsite. The project would not affect existing

¹ Map-based screening is used to determine whether a project site is located within a transportation analysis zone that exhibits low levels of vehicle miles traveled.

10. Responses to Comments

10.6 Transportation and Circulation

bicycle and pedestrian facilities on John Muir Drive that would provide non-vehicular access to the project site. Furthermore, the San Francisco Municipal Transportation Agency operates Route 58 Lake Merced, which provides public transit access to and from the project site.

10.7 Noise

The comments and corresponding response in this section cover topics in draft EIR Appendix A, Section E.7, Noise.

Comment NO-1: Noise

Response NO-1, p. 10.7-2, addresses the following comments, which are quoted below:

I-Howard-1.1, I-Howard-2.1

“Good afternoon, commissioners.

My name is Andrew Howard. I went to elementary school on the shores of Lake Merced at Frederic Burk School. I live in Mount Davidson Manor. I bike around Lake Merced five mornings a week and frequently when passing alongside the police pistol range just north of the project area, I will be jolted from my saddle by wild reports of single or multiple shots coming from the range. Later in the day at our house on Mount Davidson a few blocks away from Aptos Middle School, even here, 2.12 miles away, we can hear the gun reports. Although from here, it's always more ominous because it also comes from the direction of Lakeshore Elementary School and Lowell High School and the fear of another school shooting is always present. And now a recreational area is being planned on the parcel immediately south of the gun range. This cannot be right. Imagine a family on the ropes course and gunfire erupts nearby. The mom, with PTSD from her service in Afghanistan is right there in midair. Has the impact of this range on the project been considered?” (Andrew Howard [I-Howard-1.1])

“Here are the comments I made during the hearing 31 Mar 2022. Please include me in the response to questions.

Good afternoon, commissioners.

My name is Andrew Howard. I went to elementary school on the shores of Lake Merced at Frederick Burk School. I live in Mt Davidson Manor.

I bike around Lake Merced 5 mornings a week and frequently, when passing alongside the police pistol range just north of the project area, I will be jolted from my saddle by the loud reports of single or multiple shots coming from the range.

Later in the day at our house on Mt Davidson, a few blocks from Aptos Middle school, even here, 2.12 miles away, we can hear the gun reports. Although from here it is always more ominous because it also comes from the direction of Lakeshore Elementary school and Lowell High school and the fear of another school shooting is always present.

And now a recreation area is being planned on the parcel immediately south of the gun range. This cannot be right.

Imagine a family on the ropes course and gunfire erupts nearby. The mom with PTSD from her service in Afghanistan is right there in midair.

Has the impact of this range on the project been considered?" (Andrew Howard [I-Howard-2.1])

RESPONSE NO-1

Draft EIR Appendix A, Section E.7, Noise, p. 52, evaluates the noise impacts of the project on surrounding sensitive receptors such as the apartments across John Muir Drive. In accordance with CEQA guidelines section 15064, evaluation of the significance of environmental effects of a project is based on consideration of the direct physical changes and reasonably foreseeable indirect changes which may be caused by the project. CEQA generally does not require an analysis of the effects of existing environmental conditions (such as existing noise sources) on a project's future users or residents¹, unless the project exacerbates potential effects of existing environmental conditions.² Therefore, consistent with CEQA, the EIR does not evaluate impacts of the existing pistol range on the project.

As discussed in draft EIR Appendix A, Section E.7 (pp. 54 to 64), project construction and operation would not result in a substantial temporary or permanent increase in ambient noise levels with implementation of Mitigation Measure M-NO-2, Noise Limits for Outdoor Amplified Sound. Mitigation Measure M-NO-2 would require that RPD amplified noise event permits include restrictions on the hours, duration, and sound levels of voice or music generated by amplified equipment; require advance notice of events to residents within 300 feet of the site; and require that RPD monitor and adjust noise levels as needed during events. The compatibility of the existing noise environment with project activities may be considered and weighed by the decision makers as part of their decision to approve, modify, or disapprove the project.

¹ CEQA Section 21068 defines a "significant effect on the environment" as a substantial, or potentially substantial, adverse change in the environment. While CEQA does not generally require evaluation of the effects of existing hazards on future users of a project, it calls for such an analysis in several specific contexts involving certain airport (Section 21096) and school construction projects (Section 21151.8), and some housing development projects (Sections 21129.21, 21129.22, 21129.23, 21129.24, and 21155.1).

² *California Building Industry Association v. Bay Area Quality Management District*, 196 Cal.Rptr.3d 94 (2015).

10.8 Biological Resources

The comments and corresponding responses in this section cover topics in draft EIR Appendix A, Section E.15, Biological Resources. The comment topics are related to:

- BI-1: Special-Status and Native Plants
- BI-2: Aquatic Resources, Riparian Habitat, and Wetlands
- BI-3: Biological Resources Assessment
- BI-4: Impacts on Birds

Comment BI-1: Special-Status and Native Plants

Response BI-1, p. 10.8-2, addresses the following comments, which are quoted below:

A-CCC.2, O-CNPS.1, O-CNPS.3

“The Biological Resource Assessment included as Appendix H1 states that surveys were done in December, outside the flowering/identifiable phase of some plants species. Please complement this survey with additional information from a survey performed in the spring, to insure that no special status plant species are missed.” (Peter Benham, North Central Coastal Planner, California Coastal Commission [A-CCC.2])

“Lake Merced is a natural history wonder that features seven locally rare plants.¹ The draft EIR does not call for any mitigation yet the project will be removing both native and non-native vegetation.

The botanical surveys should be conducted during the spring and summer to ensure all plant species in particular, all annuals are included and evaluated. One example is *piperia michaelii*, Michael’s rein orchid, a rare plant of dry slopes at Lake Merced which flowers April–August. This plant, if present in the project site would have been missed in a December survey. These local, native plants are hosts for butterflies, and provide food or nesting material for birds and other species. It is important that all of the plant species are fully analyzed.” (California Native Plant Society, Yerba Buena Chapter board members [O-CNPS.1])

“Which plants will be reintroduced or restored? What mitigation measures are being taken for any native plants removed or destroyed during this project?” (California Native Plant Society, Yerba Buena Chapter board members [O-CNPS.3])

RESPONSE BI-1

Comments A-CCC.2 and O-CNPS.1 note that some special-status or rare plant species would not have been identifiable during a December survey, which is when the project's biological resources assessment occurred. As discussed in draft EIR Chapter 2, Project Description, on p. 3.2-13, soils across the site were excavated to depths ranging from 0.5 foot up to 10.5 feet as part of the soil remediation project in 2016. Prior to the start of the remediation project, pre-construction botanical surveys of the site were performed in April and July 2014, to cover the blooming periods for special-status plants with potential to occur onsite. No special-status plants were found onsite during these surveys. Following soil remediation, the site was seeded with a variety of native seed mixes. Native tree and shrub plantings were installed along the south boundary with John Muir Drive and knotweed and bulrush propagules and willow stakes were planted within the shoreline restoration areas. As stated in draft EIR Appendix A, Section E.15, Biological Resources, p. 107, special-status plant species were eliminated from further discussion in the EIR because none were identified in 2014 botanical surveys and due to the complete revegetation of the site in 2016 after soil remediation and the low potential for rare plant species to have colonized suitable habitat in such a short period of time since the remediation. This conclusion is supported by species richness and cover data collected during annual performance monitoring of restored areas since 2016 (to present), general site assessments performed by biologists or botanists on a monthly to quarterly basis during that time, and botanical surveys of the east side of the site performed in 2020 and 2021. Transects parallel to the shoreline have been monitored within the restored freshwater marsh community, typically in the month of May, for five years from 2016 to 2020. Performance monitoring and reporting of the restored willow riparian scrub areas in the spring will continue through 2025. No rare plants have been found at the project site during these performance monitoring efforts or during ongoing, routine general site assessments of the entire site where a biologist or botanist walks the entirety of the revegetated site to inspect plantings, irrigation functionality, and identify areas for weed maintenance. Botanical surveys of the east side of the site performed in the spring and summer in 2020 and 2021 also did not find special-status species. Because of the similar, if not worse habitat conditions on the west side of the site resulting from ongoing contractor staging in the revegetated perennial grassland, rare plants are not expected on the west side of the site. The information provided in this response does not change the conclusions of the draft EIR Appendix A, Section E.15, regarding potential project effects on special-status plants.

Regarding questions in Comment O-CNPS.3 about plants removed, reintroduced, or restored, see draft EIR Section 2.4.2, Outdoor Features, p. 2-8, for a description of proposed landscaping at the site, which would apply to vegetation in upland areas. As discussed in revised Section 2.4.2 (refer to Chapter 11, Draft EIR Revisions), proposed landscaping includes new California-native trees, shrubs, and other vegetation along John Muir Drive, adjacent to the pedestrian entry and exits, and at selected locations within the project site. Because CEQA does not afford protection to, require evaluation of, or require mitigation for impacts on upland communities that do not contain or support special-status species or are not considered a sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, project impacts on upland vegetation communities of the site are not required to be restored or revegetated with native species or otherwise compensated for. No sensitive natural communities were identified on the project site during the focused biological resources

assessment¹ and aquatic resources delineation² field surveys conducted as part of the current CEQA review (see draft EIR Appendices H-1 and H-2, respectively). Although not required by mitigation, the project landscape planting plan is composed of native trees, native shrubs and native seed mixes, appropriate for and complementary with shoreline vegetation within the greater Lake Merced system. As shown in Response PD-4 (p. 10.2-24), RPD has added text to Section 2.5.1 to clarify that all vegetation planted at the site would be native to California. In many areas of the project site, the existing vegetation would be retained as part of the Lake Merced West project where feasible (e.g., most of the arroyo willow riparian scrub and freshwater marsh vegetation within the project site). Some permanent vegetation and tree removal would occur in areas of new facilities and at site entrances, mainly in upland areas where perennial grassland and mixed coastal scrub woodland are present. Other existing upland vegetation temporarily disturbed during construction would be replaced upon completion of construction. New California native trees, shrubs, and other vegetation would be planted along John Muir Drive, adjacent to the pedestrian entry and exits, and at selected locations within the project site (west of the community building, near the boathouse loading area; see Figure 2-3 on p. 2-9). Throughout the site surrounding permanent infrastructure (e.g., buildings, pavement, playground, etc.) and where tree and shrub plantings are not specified, native seed mixes would be applied to revegetate groundcover, similar to existing conditions. As discussed further in Response BI-4, p. 10.8-12, the project site would continue to provide high-quality habitat for wildlife.

As discussed in draft EIR Appendix A, Section E.15, Biological Resources, pp. 115–119, arroyo willow riparian scrub and freshwater marsh wetland vegetation would be removed to facilitate construction and operation of the new boat dock and soft landing, and remediation of underlying soil. Temporary and permanent impacts on wetland vegetation would be restored or compensated for, respectively, according to mitigation measures M-BI-3a: Restoration of Arroyo Willow Riparian Scrub and Freshwater Marsh Wetlands, and M-BI-3b: Compensation for Permanent Fill of Wetlands and Waters. See Response BI-2 for additional discussion of project site wetlands.

Comment BI-2: Aquatic Resources, Riparian Habitat, and Wetlands

Response BI-2, p. 10.8-4, addresses the following comments, which are quoted below:

A-CCC.1, A-CCC.3, A-CCC.4, A-Moore.4, I-Okon.4

“Appendix H2 ‘Aquatic Resources Delineation’ acknowledges the state definition of a one parameter wetland, however the document appears only to establish the extent of state wetlands through the one parameter of hydrophytic vegetation. Please also include in the analysis and calculation of state wetlands the additional parameters that provide wetland indicators, including presence of hydric soils and wetland hydrology, for a complete estimate of the amount of wetland acreage.” (Peter Benham, North Central Coastal Planner, California Coastal Commission [A-CCC.1])

¹ CRE, 2020a. *Biological Resources Assessment for the Lake Merced West Recreation Project Site*. Prepared for the San Francisco Planning Department, April 2020 (Appendix H).

² CRE, 2020b. *Lake Merced West Recreation Project Aquatic Resources Delineation*. Prepared for the San Francisco Public Utilities Commission, April 2020 (Appendix H).

“The following comments are associated with Impact BI-3 ‘The project would have a substantial adverse effect on California Department of Fish and Wildlife-designated sensitive natural communities, riparian habitat or jurisdictional wetlands or waters.’

a. Please provide a definition and analysis of the expected acreage of both temporary and permanent impacts expected as outcomes of this project. In the past the Commission has defined ‘Temporary’ impacts as to those impacts where there is no significant ground disturbance or killing of native vegetation and the vegetation recovers to its pre-disturbance state within one year, while ‘Permanent’ impacts include anything else.” (Peter Benham, North Central Coastal Planner, California Coastal Commission [A-CCC.3])

“b. The 1:1 mitigation suggested for Impact BI-3 is not sufficient, particularly for permanent impacts to wetlands. The Commission has generally used mitigation ratios of 3:1 (acres mitigated: acres impacted) for permanent ESHA impacts and 4:1 for permanent wetland impacts, and these ratios assume that resources are being compensated for through either habitat creation or substantial restoration. With wetlands, there is an added expectation of no net loss of acreage per State of California Executive Order W-59-93. The Commission has detailed guidance on impact mitigation, and we would be happy to follow-up with more details on what might be appropriate given the scope of this project.” (Peter Benham, North Central Coastal Planner, California Coastal Commission [A-CCC.4])

“And with that, I want to go through quickly through a number of points that I've heard made over the past three or six months, particularly with project impact on not just the site at all -- on the site as it is, but on the context in which the site occurs and that is Lake Merced at large. There's habitat impact not just on the site, but habitat is indeed a matter of looking at the lake as one.” (Kathrin Moore, Commissioner, San Francisco Planning Commission, Public Hearing, March 31, 2022 [A-Moore.4])

“**Impacts of Increased Aquatic Recreation.** The EIR should address the impacts of increased activity on the lake in the form of boating and fishing. In particular, mitigation for and recycling of discarded fishing line should be addressed. Also the possible impacts of members of the boating public entering and disturbing the marsh or anchoring boats to marsh vegetation should be included in the EIR.” (Christine Okon [I-Okon.4])

RESPONSE BI-2

As discussed in draft EIR Appendix A, Section E.15, Biological Resources, Impact BI-3, p. 115, regulated wetlands and/or riparian areas would be removed during construction of the floating boat dock and soft landing. Therefore, the project’s proposed boat dock and soft landing would result in impacts on aquatic resources under the regulatory authority of the U.S. Army Corps of Engineers, Regional Water Quality Control Board, California Department of Fish and Wildlife, and California Coastal Commission.

Aquatic resources or wetlands are commonly identified by the presence of certain types of soils (hydric soils), vegetation (hydrophytic vegetation), and the presence of water (hydrology). These three indicators or “parameters” are considered in various ways by federal and state agencies when evaluating regulatory

jurisdiction over aquatic resources. As noted by Comment A-CCC.1, the California Coastal Commission applies a “one-parameter” definition of a wetland for determining the boundary of its regulatory authority over aquatic resources.³ Consequently, the boundary of a given wetland regulated by the California Coastal Commission would be the largest area that includes hydrophytic vegetation, hydric soils or hydrology. A field survey was conducted to identify the presence and extent of hydrophytic vegetation, hydric soils, and wetland hydrology (refer to Appendix H-2, *Lake Merced West Project Aquatic Resources Delineation*). The area of state wetlands mapped in Appendix H-2 and evaluated in the draft EIR encompasses all areas of the project site where hydric soils and hydrology are present in addition to hydrophytic vegetation. These areas where hydric soils and hydrology are present in addition to hydrophytic vegetation are mapped as “Section 404 Wetlands” in Figure 3 of Appendix H-2.⁴

The aquatic resources delineation in Appendix H-2 identifies hydrophytic vegetation as the indicator for the state wetland boundary because using the hydrophytic vegetation parameter encompasses the areas of wetland soils and hydrology, and delineates the largest area of potential state wetlands at this particular site due to its consistently sloped topography and orientation parallel to the Lake Merced shoreline. Appendix H-2, Section 3.7, p.16, explains, “Federal wetlands that included hydrophytic vegetation, hydric soils and wetland hydrology (i.e., open water and inundated or saturated soils) were documented at lower elevations along the Lake margin.” For example, some plants identified as facultative⁵ or facultative-wet⁶ on the U.S. Army Corps of Engineers National Wetland Plant List⁷ may not be rooted in hydric soils but are upland of the hydric soil limits. At the project site, arroyo willow (facultative-wet species) is rooted upland of the extent of hydric soils and therefore, due to the topography and orientation of the site, hydrophytic vegetation delineates the largest extent of potential wetlands.

For these reasons, using limits of hydrophytic vegetation to delineate the boundary of State wetlands within the project site is the most conservative approach to quantifying wetlands jurisdictional to the California Coastal Commission. No additional areas of State wetlands would be mapped using a parameter of either hydric soil or wetland hydrology. No revisions have been made to the draft EIR in response to this comment.

Comment A-CCC.3 requests the definition of “temporary” and “permanent” impacts applied to the evaluation of project impacts on sensitive natural communities, riparian habitat, or jurisdictional wetlands or waters, and impact acreages for the affected resources. The comment goes on to describe the California Coastal Commission’s definitions of temporary and permanent impacts. Consistent with CEQA guidelines

³ Wetlands and other environmentally sensitive habitats in California’s Coastal Zone are regulated by the California Coastal Commission under the California Coastal Act of 1976. The commission broadly defines wetlands under the Coastal Act (Cal. Pub. Res. Code §30121) as follows: “Wetland means lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, or fens.” Whereas the federal definition require the presence of all three wetland identification parameters to be met (hydrophytic vegetation, hydric soils, and hydrology), the commission regulations (California Code of Regulations Title 14 (14 CCR)) establish a “one parameter definition” that only requires evidence of a single parameter to establish wetland conditions.

⁴ Under Section 404 of the federal Clean Water Act the U.S. Army Corps of Engineers applies a three-parameter definition of a wetland for determining the boundary of federal regulatory authority over aquatic resources which often results in a smaller area than one-parameter state wetlands.

⁵ Plants that occur in a variety of habitats, including wetland and mesic to xeric non-wetland habitats, but commonly occur in standing water or saturated soils.

⁶ Plants that nearly always occur in areas of prolonged flooding or require standing water or saturated soils but may, on rare occasions, occur in non-wetlands.

⁷ US Army Corps of Engineers, 2020. Arid West 2020 Regional Wetland Plant List, version 1.0. U.S. Army Corps of Engineers, Engineer Research and Development Center Cold Regions Research and Engineering Laboratory, Hanover, NH, https://wetland-plants.sec.usace.army.mil/nwpl_static/v34/home/home.html#

section 15064.7, the city of San Francisco evaluates project impacts using standard CEQA significance criteria, which are used to determine whether impacts will be significant.⁸ The draft EIR Appendix A Section E.15, Biological Resources, analysis considers temporary impacts to be those associated with construction disturbance (e.g., staging, grading, access) and where, following construction, disturbed areas would be restored/revegetated in-kind and not result in permanent displacement (e.g., with new, permanent infrastructure) of a sensitive natural community, riparian habitat, or jurisdictional wetlands. Project components that result in removal of a regulated resource to support the new use of the area (e.g., wetland vegetation removal to support the new boat dock and soft landing) are considered permanent. Temporary impacts as described in the analysis are not restricted to recovery within a certain timeframe, as the commenter notes is the California Coastal Commission's approach for assessing project consistency with the Coastal Act, applicable coastal plans, and for consideration of coastal development permit approval.

The commenter also requests the acreage associated with temporary and permanent impacts on these resources. Draft EIR Appendix A, Section E.15, Table 16 – Aquatic Resources within the Delineation Study Area, identifies 5.04 acres of wetlands and 5.49 acres of other waters in the project study area as being within California Coastal Commission's jurisdiction; however, the 30-acre study area for the wetland delineation consists of the 11-acre project site (composing 36.7 percent of the overall study area) and a 200-foot buffer around the project site. Therefore, temporary impacts on aquatic resources caused by construction on the project site would be substantially less than the acreages listed in Table 16. The draft EIR Appendix A Section E.15 analysis conservatively assumes that construction would include ground disturbance along the northern project site boundary, which would affect areas of arroyo willow riparian scrub, swamp knotweed, and California bulrush wetland vegetation, or open water; however, exact acreages of temporary impacts are not quantified. At a minimum, permanent placement of fill within other waters, wetlands, and/or riparian areas would occur within the footprints of the project's proposed floating boat dock and soft landing, preliminarily estimated at 0.22 acre of arroyo willow riparian scrub and 0.34 acre of freshwater marsh, as discussed on draft EIR Appendix A p. 115. A greater area of temporary disturbance, extending beyond the project component footprints, is expected at locations that would require the removal of contaminated sediment; however, the temporal loss of wetlands beyond the project component footprints would be brief and inconsequential relative to the surrounding habitat. A refined estimate of project impacts on riparian habitat, wetlands, and other waters of the U.S. and State would be determined after the 65 percent design plans are available and provided to regulatory agencies with authority over these resources, including the California Coastal Commission, during the permitting process.

As CEQA lead agency, the city has determined that the 1:1 mitigation ratio noted in Comment A-CCC.4 and applied in the draft EIR is appropriate mitigation for impacts to jurisdictional wetlands or waters under CEQA, as it avoids a net loss of these aquatic resources. Draft EIR Mitigation Measure M-BI-3b, Compensation for Permanent Fill of Wetlands, (Appendix A p. 118) identifies the 1:1 ratio for wetlands and waters impacted to those created/restored/enhanced as a minimum compensation ratio and anticipates that other or additional mitigation requirements may be imposed by regulatory agencies with authority over Lake Merced and its shoreline resources impacted by the project. The California Coastal Commission will have an opportunity to address the topic of mitigation ratios for impacted resources under its jurisdiction during the coastal development permit process, but for the reasons described above, no revisions have been made to the draft EIR in response to this comment.

⁸ In CEQA guidelines section 15064.7, each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects.

Comments I-Okon.4 and A-Moore.4 convey concern for possible impacts of increased boating and fishing and associated trash, and project impacts on lake habitat as a whole. As stated on draft EIR Appendix A pp. 118–119 under Impact BI-3, the anticipated increase in boats on the lake and general site use would not result in significant adverse effects on water quality caused by litter. The project would comply with article 6 of the San Francisco Health Code, Garbage and Refuse, and with the Trash Amendment of the *Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California*, which require that specific measures be implemented during operation to capture and contain site and user litter, thus reducing the potential for water quality impacts on aquatic habitat (see draft EIR Section E.17, Hydrology and Water Quality). Comment I-Okon.4 also raises concerns about disturbance to shoreline vegetation from boats entering the lake or anchoring in marsh vegetation. Draft EIR Appendix A, Section E.15, addressed this issue as it relates to additional boats affecting wildlife movement on the lake waters or use of shoreline vegetation (see Impact BI-4, page 119). The Impact BI-4 analysis concludes that increased recreational boating caused by the project would not substantially disrupt waterfowl movement or use of the lake because boaters would not be permitted to enter sensitive habitat areas of shoreline vegetation where waterfowl may nest (in addition, recreational boating is already permitted on the lake). As stated under draft EIR Appendix A, Section E.15, Impact BI-3, g. 115, operation of the boat dock and soft landing may require occasional vegetation removal to maintain user access to the water. Refer to Response BI-4, page 10.8-12, for a discussion of project impacts on birds related to habitat disturbance onsite. No revisions have been made to the draft EIR in response to these comments.

Comment BI-3: Biological Resources Assessment

Response BI-3 addresses the following comment, which is quoted below:

A-Imperial.2

“I do have also -- in terms of the EIR and how -- the kind of analysis that has been done in terms of the biological resources and how the biologist can be part of this during the construction time, I mean I think there are some good mitigation measures are being done here.” (Theresa Imperial, Commissioner, San Francisco Planning Commission, [A-Imperial.2])

RESPONSE BI-3

As noted by the commenter, the project would reduce potential impacts on sensitive biological resources with implementation of the SFPUC’s standard construction measure 7, Biological Resources; RPD’s standard construction measure 3, Biological Resources; and mitigation measures which require that, prior to construction, qualified biologists would prepare and provide a project-specific environmental awareness training program. Attendance would be required for all workers onsite. Additionally, qualified biologists would conduct preconstruction inspections of suitable habitat for western pond turtle and bats, and implement additional protective measures if these animals are found onsite, such as biological monitoring during construction. Following construction, temporarily disturbed wetlands and riparian areas would be

restored/revegetated with oversight from a qualified biologist. The following mitigation measures include more specificity on the involvement of qualified biologists onsite throughout project implementation.

Mitigation Measure M-BI-1a, Worker Environmental Awareness Program Training

Mitigation Measure M-BI-1b, Avoidance and Minimization Measures for Western Pond Turtle

Mitigation Measure M-BI-3a, Restoration of Arroyo Willow Riparian Scrub and Freshwater Marsh Wetlands

Mitigation Measure M-BI-3b, Compensation for Permanent Fill of Wetlands and Waters

Mitigation Measure M-BI-6, Avoidance and Minimization Measures for Bats

Comment BI-4: Impacts on Birds

Response BI-4, p. 10.8-12, addresses the following comments, which are quoted below:

A-GGAS.1, O-CNPS.4, I-Hall.1, I-Okon.1, I-Okon.2, I-Okon.3, I-Okon.5

“In reviewing the draft EIR, GGAS was surprised to read on Page 30 as part of the ‘Summary of Impacts and Mitigation Measures’ under Impact BI-2 that ‘Construction and operation of the project would not have a substantial adverse effect on special status birds’ and that ‘no mitigation is required’.

Additionally, the ‘Summary of Impacts and Mitigation Measures’ under Impact BI-5 on page 32 of the draft EIR further states that ‘Construction and operation of the project would not have a substantial adverse effect on nesting bird wildlife nursery sites or result in an increase in bird collisions with project features’ and that ‘no mitigation is required’.

A Biological Resources Assessment of the Lake Merced West Recreation Project conducted by Coast Ridge Ecology dated July 2020 and summarized on Page 652 of the draft EIR was based on a project site survey for biological resources by Coast Ridge Ecology biologists. The site survey was conducted during several visits in December 2019. Among the twelve animal species with special status that were considered in their assessment for their potential to occur on the project site are six species which are listed by the California Department of Fish & Wildlife as¹ ‘Bird Species of Special Concern’: Bank Swallow, California Black Rail, Northern Harrier, Saltmarsh Common Yellowthroat, White-tailed Kite and Yellow Rail. Of those, three were evaluated as having ‘moderate’ potential to occur on site and one species, the Saltmarsh Common Yellowthroat, was observed by the surveyors. The assessment further notes on Page 654 that ‘Extensive foraging and nesting habitat for bird species protected under the Migratory Bird Treaty Act (MBTA) can be found on site. It is likely that several passerine and raptor species may nest within the project site.’

Additionally, on page 663, the assessment notes that ‘Biological value for wildlife within the project is extensive. The site harbors high quality native riparian and upland vegetation communities, relatively free of non-native and invasive species, which are valuable habitat for birds and small mammals that thrive among an environment dominated by native vegetation.’

Of the four California bird species of special concern that were noted in the Assessment of July 2020 as having at least moderate ‘potential to occur’ on the project site, Golden Gate Audubon would like to focus attention particularly on the Saltmarsh Common Yellowthroat, which has been observed nesting at Lake Merced and which was present during the survey of December 2019. This species is in steep decline.

During a visit to the Lake Merced West site on March 22, 2022, San Francisco eBird reviewer, Dominik Mosur, observed and recorded Saltmarsh Common Yellowthroats displaying ‘possible’ to ‘confirmed’ breeding behavior. I personally have observed male Common Yellowthroats singing at this location, indicating territorial displays and possible nesting. According to Mr. Mosur, one of San Francisco’s top experts on local birds, and one of the most frequent visitors to Lake Merced and specifically, the Lake Merced West site, this site represents about 25% of this subspecies’ nesting habitat at Lake Merced.

The Biological Resources Assessment’s recommendations on page 677 of the draft EIR with respect to nesting birds are as follows:

‘If the project begins construction within the nesting bird season (February 1 – August 31), it is recommended that a survey for nesting birds (including raptors and salt marsh common yellowthroat) is conducted within the project site and a 200-foot buffer around project boundary. The survey should be conducted within one week prior to any ground disturbance, vegetation or structure removal associated with the project to minimize impacts to these species. If active bird nests are detected, suitable no-work buffer zones may need to be established to ensure nesting birds are not impacted.’

GGAS wonders how, given the findings of the Biological Resources Assessment, the draft EIR can conclude that ‘Construction and operation of the project would not have a substantial adverse effect on special status birds’ and that ‘no mitigation is required’. Clearly, Saltmarsh Common Yellowthroat and the three other bird species of Special Concern, Bank Swallow (regularly reported on eBird reports at Lake Merced and specifically Lake Merced West); Northern Harrier; and White-tailed Kite (most recently recorded via eBird at Lake Merced West on 10/30/2021) should be afforded the same consideration and mitigation as the Western Pond Turtle and bat species. These two species have significant mitigation measures listed in the draft EIR, yet no similar measures are indicated for bird species of special concern. We believe this to be an oversight.

Bird populations in North America have declined by nearly 3 billion since 1970. One of the major contributing causes is habitat loss and human disturbance. We urge you to consider the environmental impacts on birds in this important habitat consisting of over 11 acres that comprise the watershed’s largest area of flat land outside of Harding Park, to make sure protection of birds is given top priority in the Lake Merced West Project development plans.

The Biological Resources Assessment further concludes on page 671 of the draft EIR: ‘In addition to the special-status bird species described above, extensive foraging and nesting habitat for a variety of bird species protected under the MBTA can be found on site within the native habitats of coast live oak woodland, tufted hairgrass meadow, and arroyo willow thicket. Common species observed on site that may nest within the project site or immediate vicinity include marsh wren, red-shouldered hawk, red-tailed hawk, black phoebe, and Anna’s hummingbird (*Calypte anna*).’

Per GGAS’s (Golden Gate Audubon Society) comments on the scope of the environmental review in the EIR planned for the project at Lake Merced West, dated July 8th, 2021, 277 species of birds have been observed at Lake Merced, the **highest number for any location** in San Francisco, according to eBird data. In addition to its importance to migrating birds foraging and passing through, Lake Merced is an important breeding area for a number of bird species in addition to those of special concern.

Specifically, eBird data list 118 species recorded at the site of the former Pacific Rod and Gun Club, the location of the proposed West Lake Merced [*sic*] project. As recently as March 22, six species were noted by San Francisco eBird reviewer, Dominik Mosur, as displaying ‘possible’ to ‘confirmed’ breeding behavior. White-tailed Kite, another species of Special Concern was reported on 10/30/2021. Bank Swallows also appear frequently on eBird reports from Lake Merced. Clearly, more study by trained ornithologists at the site of the proposed project is needed to minimize and mitigate any harmful effects of construction and operation of the project on species of special concern and bird species in general. The ornithological surveys should be conducted during the overwintering, spring and fall migration and summer breeding seasons to ensure that data on all bird species that depend on this habitat are fully analyzed.

We sincerely hope that you will take the concerns mentioned in this letter into consideration and include mitigation for the birds that utilize the prime habitat located at the Lake Merced West Project site for nesting and foraging. We thank you for your attention and consideration and look forward to answering any questions you may have.

^{1*} Shuford, W. D., and Gardali, T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento. California” (Whitney Grover, Chair, San Francisco Conservation Committee, Golden Gate Audubon Society [A-GGAS.1])

“How will any native plants removed for the project impact the local insects and bird populations?”
(California Native Plant Society, Yerba Buena Chapter board members [O-CNPS.4])

“I’m really concerned that the Lake Merced West Draft EIR doesn’t call for mitigation for the San Francisco Common Yellowthroat. This bird is in steep decline and relies on the native vegetation for foraging and nesting, particularly the grasses and sedges near the shoreline. Instead of destroying the habitat consider a full restoration of the shoreline habitat. Climate change is accelerating wildlife species decline.

Development is a huge part of the problem. San Francisco needs to be responsible citizen of the planet.

Reference:

Habitat Requirements

San Francisco Yellowthroats are tied to the distribution of suitable freshwater and salt marshes with nearby willow thickets. Nests in marshy areas that are usually higher off the ground, where they are safer from flooding.

Food Habits

Common Yellowthroats forage on or near the ground, eating insects and spiders from leaves, bark, branches, flowers, or fruit in low vegetation. Though they mostly glean their food while perched, they may sally out from a perch to catch prey. Like many birds, Common Yellowthroats also eat grit, which possibly helps them digest food or adds minerals to their diet.

Movement/Home Range

The San Francisco subspecies of the Common Yellowthroat is endemic to the greater San Francisco Bay area of California. Is a resident in its breeding range, with some birds migrating to San Diego County for winter.

Reproductive Strategy

The female builds her well-concealed nest on or near the ground by building a platform of grasses and leaves, and then gradually weaves a loose, bulky outer cup of grasses and sedges. Sometimes a Common Yellowthroat nest has a roof, like the nest of an Ovenbird.

Other

The San Francisco Yellowthroat has undergone severe declines due to habitat loss and alteration. Breeding Bird Survey data are inadequate for trend assessment, but Common Yellowthroat populations are generally steady to slightly decreasing. For more information about this species, including occurrence, conservation strategies and recovery actions in specific states or regions, refer to the following resource: Shuford, W. D., and Gardali, T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=10427> <https://ecos.fws.gov/ecp/species/2084> (Bob Hall [I-Hall.1])

“As a member of the San Francisco Conservation Committee for Golden Gate Audubon, I am confused and disturbed to read in the draft EIR report for the Lake Merced Project that ‘Construction and operation of the project would not have a substantial adverse effect on special status birds’ and that ‘Construction and operation of the project would not have a substantial adverse effect on nesting bird wildlife nursery sites or result in an increase in bird collisions with project features.’

Bird populations in North America have declined by nearly 3 billion since 1970. One of the major contributing causes is habitat loss and human disturbance.

Per GGAS’s (Golden Gate Audubon Society) comments on the scope of the environmental review in the EIR planned for the project at Lake Merced West, dated July 8th, 2021, 277 species of birds have been observed at Lake Merced, the **highest number for any location** in San Francisco, according to eBird data. In addition to its importance to migrant birds foraging and passing through, Lake Merced is an important breeding area for a number of bird species.

Specifically, eBird data list 118 species recorded at the site of the former Pacific Rod and Gun Club, the location of the proposed West Lake Merced project. As recently as March 22, six species were noted by a reputable observer as displaying ‘possible’ to ‘confirmed’ breeding behavior. Included among them is a ‘Species of Special Concern’, the *San Francisco or Saltmarsh subspecies of the Common Yellowthroat, which was observed displaying probable breeding behavior. That subspecies is ranked ‘3’ on both the federal and state level, indicating it is ‘vulnerable’. * Shuford, W. D., and Gardali, T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. *Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento, California.*

GGAS feels that the birds impacted by the work being proposed for the construction and operation of the project deserve at least the same level of mitigation proposed for the Western Pond Turtle and bat colonies.” (Christine Okon [I-Okon.1])

“Native Vegetation Management and Restoration. Native plant communities support hundreds of native insects, birds, reptiles, amphibians and mammals. GGAS hopes a well- developed analysis will address what native and vegetation mixes can be used to enhance the current vegetation mix at the site. In particular, the meadow area is now an important foraging area for finches, sparrows, and other birds. The EIR should address the impacts of any future plantings on the habitat value for birds and other wildlife and whether a grassland habitat can be re-established.” (Christine Okon [I-Okon.2])

“Artificial Lighting. Lake Merced lies on a significant path within the Pacific Flyway. Each year, particularly in fall (August – November) it is estimated tens of thousands of birds fly over this specific area. Most of this migratory movement occurs at night and it can be negatively impacted by lighting. The EIR should include an analysis of any additional light generated from the new facilities and nighttime activities planned for the site. It is well established that artificial lights have negative impacts on native wildlife by increasing predation, disturbing natural breeding and migration patterns, and altering foraging behavior. The EIR should address this issue.” (Christine Okon [I-Okon.3])

“Bird Safe Building Design. The project should be designed in a manner which incorporates bird safety.” (Christine Okon [I-Okon.5])

RESPONSE BI-4

Comments A-GGAS.1, O-CNPS.4, I-Hall.1, and I-Okon.1 express surprise that the draft EIR Appendix A, Section E.15, Biological Resources, analysis concludes that construction and operation of the proposed project would not have a substantial adverse effect on birds, and convey concern that mitigation for project impacts on San Francisco common yellowthroat and other birds is not identified.

Draft EIR Appendix A, Section E.15, evaluates the project’s impacts on birds in several impact discussions: Impact BI-2 (p. 112) discusses project impacts on special-status birds; Impact BI-4 (p. 119) discusses project impacts on migratory wildlife species; and Impact BI-5 (p. 120) discusses project impacts on nesting bird nursery sites and impacts related to bird collisions.

As noted in these impact discussions and in draft EIR Chapter 2, Project Description, Section 2.6, SFPUC and RPD have adopted standard construction measures that are mandatory and apply to all construction projects; these include air and water quality measures, biological resources measures, visual and aesthetic considerations, and cultural resources measures that provide a standardized approach to avoiding or minimizing impacts on these resources from their various projects. Draft EIR Appendix C presents the complete text of the standard construction measures. As discussed in draft EIR Appendix A, Section E.15, p. 115, potential nesting common and special-status nesting birds would be protected during construction

with the project's implementation of SFPUC's standard construction measure 7, Biological Resources, and RPD's standard construction measure 3, Biological Resources.

As stated in the Impact BI-2 and BI-5 discussions, consistent with the standard construction measures, a qualified biologist would conduct surveys of the project site for active nests during the nesting season. The biologist would establish protective measures around active nests, such as restricting certain construction activities in buffer zones during the time of year when and where birds are breeding and nesting. Buffers would be determined by considering the bird species, identifying whether the nest has a visual line of sight from work activities, and considering the types of work activities in process. A qualified biologist would monitor the active nest to confirm that the buffer is sufficient to avoid impacts and would increase or decrease the size of the buffer as necessary. The buffer would be maintained until the birds fledge. With implementation of these adopted standard construction measures, significant impacts under CEQA are avoided and mitigation is not required for project construction to result in less-than-significant impacts on nesting birds. The project area would provide similar, suitable habitat and nesting opportunities for local special-status birds. Noise and visual disturbances associated with daytime use of the project site during operation would be concentrated in the developed center, away from high quality habitat that would attract birds to nest. Noise and visual disturbances generated during daytime and evening operating hours are not expected to substantially disrupt special-status bird use of the site or impact active nests as described in Impacts BI-2 and BI-5 in draft EIR Appendix A p.114 and p. 121, respectively.

Comments O-CNPS.4 and I-Okon.2 express concern over loss of native vegetation onsite that supports local wildlife, and Comment I-Okon.2 recommends that the EIR address how future plantings will affect the site's habitat value for local wildlife. Comment I-Hall.1 recommends restoring shoreline habitat. As shown on draft EIR Appendix A, Section E.15, Figure 10 – Wetland Vegetation Alliance Vegetation Community Wildlife Habitat, p. 101, the project generally would avoid disturbing shoreline habitat. The project has been designed to minimize impacts on shoreline habitat that supports birds by generally siting new facilities away from shoreline vegetation, as shown in Figure 2-3 in Draft EIR, Chapter 2, Project Description. The area of willow riparian scrub community removed to construct the boat dock and soft landing (preliminarily estimated as 0.22 acre of arroyo willow riparian scrub and 0.34 acre of freshwater marsh) would result in negligible wildlife habitat impacts in the context of acres retained at the project site and habitat offered by the greater Lake Merced system. As discussed in draft EIR Section 2.5.1, p. 2-13, some permanent vegetation and tree removal would occur in areas of new facilities or at site entrances, mainly in upland areas; other existing vegetation disturbed in support of project construction would be replaced upon the completion of construction. As discussed in PD-4 in Section 10.2, Project Description, of this document, new California-native trees, shrubs, and other vegetation would be planted along John Muir Drive, adjacent to the pedestrian entry and exits, and at selected locations within the project site (west of the community building, near the boathouse loading area; refer to draft EIR, p. 2-9, Figure 2-3). Groundcover would be revegetated with a variety of native seed mixes (low coastal scrub, coastal scrub, coastal dune, and vegetated swale) to preserve habitat diversity onsite which would similarly support birds and other wildlife currently using the site. Overall, the native vegetation onsite (retained, replaced, or new) would provide high-quality nesting and foraging habitat for resident and migratory birds, in addition to native insects, reptiles, amphibians, and mammals, similar to existing conditions.

Comment I-Okon.3 recommends that the EIR include an analysis of whether and how light generated by the new facilities and nighttime activities planned for the site impacts migratory birds and other wildlife that use the site. Draft EIR Chapter 2, Project Description, Section 2.7.3, p. 2-22, includes a description of proposed

10. Responses to Comments

10.8 Biological Resources

lighting; as discussed, safety lighting for evening and nighttime illumination would be provided in parking areas, along main pedestrian walkways, and around buildings. No recreational lighting would be provided. Lighting onsite would be consistent with the city's Standards for Bird-Safe Buildings, which require minimal lighting and shields on lighting. Uplighting and event searchlights would be prohibited. Because new lighting would be shielded to eliminate upward radiance, it would not appear to birds as a point source of light from above. In addition, the glow from the project site is not expected to appear as a distinct and isolated light source, given the proximity of other lighted areas such as the nearby apartment buildings, Interstate 280 and the Great Highway, and nearby shopping centers.

Impacts of the project on migratory wildlife species, including birds, are evaluated in draft EIR Appendix A, Section E.15, Impact BI-4, p. 119. Given the typical altitude at which migrating birds fly, the shielding of the project site's lights, and studies suggesting that night-flying birds are attracted to point sources of light rather than larger illuminated areas, the project's lighting would not be likely to interfere with a migratory corridor or cause a hazard for migratory birds through the phenomenon of light "entrapment." None of the information provided in this response changes the conclusions of the EIR regarding potential effects on migratory birds.

As discussed under the Aerial Avian Collisions discussion in draft EIR Appendix A, Section E.15, Impact BI-5, p. 115, each of the proposed project's low-profile buildings would be required to comply with the city's adopted Standards for Bird-Safe Buildings⁹ and would incorporate specific design elements into the development to avoid or minimize avian collisions, as recommended in Comment I-Okon.5.

⁹ San Francisco Planning Department, Standards for Bird-Safe Buildings, 2011, http://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards%20for%20Bird%20Safe%20Buildings%20-%202011-30-11.pdf.

10.9 Hydrology and Water Quality

The comment and corresponding response in this section covers topics in draft EIR Appendix A, Section E.17, Hydrology and Water Quality.

Comment HY-1: Water Quality

Response HY-1 addresses the following comment, which is quoted below:

I-Brownell.3

“SUMMARY OF IMPACTS AND MITIGATION MEASURES

Hydrology and Water Quality section

Impact C-HY-1 "impacts on hydrology and water quality"

COMMENT

This project can POSITIVELY impact the water quality by allowing rowing clubs to change the motors on the coaching motor boats from gas to electric. Installing a boathouse and boat dock that has electric power (and solar panels on roof ideally) would make this possible. Lake Merced is not well "flushed" and has water quality issues. Gasoline engines add pollutants to the Lake. Electric [sic] engines would not.” (Gail Brownell [I-Brownell.3])

RESPONSE HY-1

The project proposes facilities that would support non-motorized boating on the lake. As described in Draft EIR, Chapter 2, Project Description, Section 2.3 Project Objectives, one of the project objectives is enhancement of public awareness of water quality, water supply, ecological, and watershed protection issues by providing compatible public recreational opportunities in the Lake Merced watershed. The project would not affect the rowing clubs’ ability to use electric motors on coaching motorboats. Impact HY-1 in draft EIR Appendix A (p. 139) describes existing water quality in Lake Merced and discusses the project’s water quality impacts, which would be less than significant.

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10.10 General Comments

The comments and corresponding responses in this section cover general subjects, some of which are relevant to and addressed in the draft EIR. The comment topics are related to:

- GC-1: Community Collaboration or Coordination
- GC-2: EIR Process
- GC-3: Support, Opposition, and Opinions Related to the Project

Comment GC-1: Community Collaboration or Coordination

Response GC-1, p. 10.10-4, addresses the following comments, which are quoted below:

O-CNPS.5, I-Brownell.7, I-Downey.1, I-Kahn-Kirby.2, I-Lynch_H.1, I-Murphy.1, I-Post.1, I-Powell-1.2, I-Powell-2.1, I-Powell-2.5

Response GC-1 also addresses the following comments that are similar or identical to the representative comment quoted on p. 10.10-3 and are not individually listed to avoid repetition:

I-Austin.1, I-Aviva.1, I-Casement.1, I-Caliandro.1, I-Chen.1, I-Cho.1, I-Carman_E.1, I-Carman_I.1, I-Eigers.1, I-England.1, I-Foster.1, I-Gabalda.1, I-Gelman.1, I-Griffith.1, I-Hagiwara.1, I-Harrington.1, I-Harris.1, I-Johansen.1, I-Johnson-1.1, I-Johnson-2.1, I-Khaishgi.1, I-Koenig_P.1, I-Lambert-2.1, I-Lynch_S.1, I-McGahey.1, I-McManus.1, I-Miller.1, I-Murphy.1, I-Paul.1, I-Petitt.1, I-Rosen.1, I-Rosenblum_K.1, I-Rosenblum_S.1, I-Ruiz.1, I-Sanders.1, I-Scott.1, I-Smith.1, I-Vasquez.1, I-Vaughan.1, I-Yeh.1

“Lake Merced is an important and fragile ecological resource. Despite encroaching urbanization, watershed changes, fragmentation, and aquifer reduction since the twentieth century, the lake remains a unique habitat supporting riparian, dune scrub, and woodland forest natural communities. CNPS Yerba Buena chapter looks forward to working with you on this project.” (Eddie Bartley, President; Paul Bouscal, Vice President; Beth Cataldo, Volunteering; Sophie Constantinou, Secretary; Elliot Goliger, Horticulture; Bob Hall, Treasurer; Libby Ingalls, Newsletter Production; Susan Karasoff, Outreach; Susan Mullaney, Plantsgiving; Jake Sigg, Conservation; and Noreen Weeden, Programs; California Native Plant Society [O-CNPS.5])

“So... this is the way the rowing community is put off...Is there an opportunity for the rowing clubs to be involved in the design process to assure that whatever design is proposed will actually work? I understand that a group of rowers has provided input and designs in the past to SF Park and Rec. What happened with that input?” (Gail Brownell [I-Brownell.7])

10. Responses to Comments
10.10 General Comments

“1) The SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and did not appropriately take into consideration the views of the SF rowing community, who are the biggest users and supporters of the lake. It would be tragic to miss this opportunity to maximize the potential of the site.”
(Patty Downey [I-Downey.1])

“As the process moves forward, I would like SFRPD to work together with the lake's most passionate users, the PRC/SI/SFRC/Dolphin clubs. Please replace the current EIR plan with the version that incorporates PRC/SI's vision for the lake, saving time and expense for Planning staff and the community. Most of all, please create an opportunity for more youth (and adults!) to experience water sports in San Francisco.”
(Amanda Kahn-Kirby [I-Kahn-Kirby.2])

“1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake —rowing. The SFRPD didn't consult with the rowing teams, the resident experts. And given the common legal combat over EIR's and deviations from approved documents, the reassurances that the building marker is “only a placeholder” do not ring true.” (Harrison Lynch [I-Lynch_H.1])

“My name is Bart Murphy. I'm a San Francisco resident and my son Dennis has been a member of the PRC and -- both PRC and SI rowing club. I'm calling to support the Draft EIR and add my comments in support of Supervisor Melgar and the speakers from both rowing clubs. And requesting that somebody within the public service reach out to the rowing clubs and let them know the best way possible to advance their ideas in this process.

A lot of work was put into the adding comments of the EIR when it was being handled by Park and Rec and for some reason, it didn't -- those comments didn't get highlighted or make it into this analysis in front of you. So, I would ask you to take that onboard and it would be fantastic if someone from the Planning Department would reach out and provide that community service to -- to these interested parties. I will add my comments in a letter and supplement it for the record.” (Bart Murphy [I-Murphy.1])

“I am a member of the San Francisco Rowing Club (SFRC), one of several rowing clubs and teams whose members row regularly on Lake Merced. I am concerned that the proposed plans for the Lake Merced West site are inadequate and poorly researched. I am particularly disappointed that SFRPD did not consult with the rowing community before producing a preliminary Plan and drafting an EIR. I am sure that effort was undertaken with good intentions, but it completely misses the mark! I respectfully beg SFRPD to reconsider the current proposals WITH INPUT FROM PEOPLE THAT ACTUALLY USES THE LAKE! Please do not waste more time and taxpayer money on a plan that won't work!” (William N. Post [I-Post.1])

“I want to thank Supervisor Melgar for her unbelievably clairvoyant, the fact that the needs and the desires of the community are not being met by this EIR. And I'm sorry to say this, but I was very disappointed in the

number of the community meetings that were held by Parks and Rec because members of the community were stonewalled. They were boxed out. I was muted. I was not allowed to have questions. And, frankly, they did not listen to the needs of the community. So Supervisor Melgar, thank you. And please, keep pushing for the right things for the city and for the community. It just seemed like the Parks and Rec department in the EIR process and the property manager of there just had a train on the track and weren't ready, willing or able to listen to the people. So I want to thank you and please know that while we all support this for the city, we do need leadership like you to make sure it doesn't change. Thank you very much, commissioners.” (Wes Powell [I-Powell-1.2])

“I’d like to know if the requests by Supervisor Melgar and the Planning commissioners at last weeks’ meeting to ensure that the EIR address the prospect of a larger Boathouse in the EIR so that a larger boathouse can be built without going through any EIR process again. Can this please be confirmed?” (Wes Powell [I-Powell-2.1])

“During a ‘community meeting’ whereby dozens of citizens expressed their views for an expanded boathouse, the comments were ignored, never addressed, or simply muted from the Zoom call. When written questions were required, my written questions were paraphrased incorrectly, then I was muted. The so called “Public Meetings” might check the procedural box for those pushing the current EIR plan, but they clearly did not take input or address input by the community.

Why hasn’t the City Planning Department, The Lake Merced Property Manager, or EIR team ever met with the Citizen stakeholders who use Lake Merced? After attending a number of EIR so called ‘community meetings,’ I’ve learned that this has not happened. Except for Supervisor Melgar and a few Comissioners at the last meeting identifying the lack of public input addressed in the EIR, how can all of the others involved in the EIR process be obtuse?.

My hope is that the good work Supervisor Melgar can help bring, along with the few Planning Commissioners able to see the misguided EIR process at last weeks’ meeting, will allow the Planning Department to engage with the community earnestly. Otherwise, I and others will know this project to be a travesty of government process.” (Wes Powell [I-Powell-2.5])

“SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.” (This comment is representative of the following comments received via email between February 23 to April 11, 2022, which are similar or identical to the representative comment: I-Austin.1, I-Aviva.1, I-Casement.1, I-Caliandro.1, I-Chen.1, I-Cho.1, I-Carman_E.1, I-Carman_I.1, I-Eigers.1, I-England.1, I-Foster.1, I-Gabalda.1, I-Gelman.1, I-Griffith.1, I-Hagiwara.1, I-Harrington.1, I-Harris.1, I-Johansen.1, I-Johnson-1.1, I-Johnson-2.1, I-Khaishgi.1, I-Koenig_P.1, I-Lambert-2.1, I-Lynch_S.1, I-McGahey.1, I-McManus.1, I-Miller.1, I-Murphy.1, I-Paul.1, I-Petitt.1, I-Rosen.1, I-Rosenblum_K.1, I-Rosenblum_S.1, I-Ruiz.1, I-Sanders.1, I-Scott.1, I-Smith.1, I-Vasquez.1, I-Vaughan.1, I-Yeh.1)

RESPONSE GC-1

The comments above express interest in continued stakeholder collaboration on the project design, generally with a focus on issues related to rowing. While these comments are acknowledged, and do not address the adequacy or accuracy of the EIR impact analysis, RPD is considering a larger boathouse for the site after consultation with the rowing community. Refer to Chapter 8, Project Variant, for a description of the larger boathouse and associated evaluation of environmental impacts.

Comment GC-2: EIR Process

Response GC-2, p. 10.10-5, addresses the following comments, which are quoted below:

A-Diamond.1, A-Koppel.1, A-SFBOS.1, A-Tanner.1

“Thank you. I too want to thank Supervisor Melgar. Nice to see you in front of your old commission. Two sets of comments. First is, as I understand Section 283 of the EIR, our only input with respect to this project is to review and certify the EIR. We have no input on the actual decision as to what is built.” (Sue Diamond, Commissioner, San Francisco Planning Commission [A-Diamond.1])

“Thank you, Supervisor Melgar, for coming by in person. It's great to see you. Growing up in Park Merced and also attending Lowell High School, I know the area very well. And for those of you who don't know, there's a big lake in the very southwest corner of the city. A really big one. Not only have we hosted major golf championships, like the PGA championships at the public Harding Golf Course, but I'm thrilled to see this very underutilized section of the lake brought to where it should be.

There's not as many things to do in that part of town as you might think, and so just something as minor as this is going to do such a huge improvement for the neighborhood. And it just brings a lot of color to a part of town that just was sometimes a little more gray. So thrilled to see where we're at. And I'm very confident that we'll get to the right landing spot eventually thanks to the supervisor's work.” (Joel Koppel, Commissioner, San Francisco Planning Commission [A-Koppel.1])

“Thank you so much. I'm so excited to come before you for the first time and in person. So, I am Myrna Melgar, Supervisor for District 7 and Lake Merced is part of my district. And I have been working with the community on this for over a year, since I was elected.

First I wanted to say thank you so much to the Recreation and Parks Department and to the planning staff for the work in this document. It is -- Lake Merced is the jewel of our city. It provides natural habitat for water, wilderness and fowl and ducks and all kinds of wildlife, including the famed west side coyotes, who you may have heard of.” (Myrna Melgar, Supervisor, District 7 [A-SFBOS.1])

“Thank you. I want to just first thank all the callers and those here in the room, thank you, Supervisor, for joining us and for those who are participating not only today, but throughout the development of this plan, certainly want to support your comments and I just want to thank staff as well for your very thorough review as usual. Very comprehensive EIR.” (Rachael Tanner, President, San Francisco Planning Commission [A-Tanner.1])

RESPONSE GC-2

The comments presented above generally discuss aspects of the EIR process but do not raise specific issues concerning the adequacy or accuracy of the EIR’s discussion of physical environmental impacts. Chapter 7, Introduction, describes the EIR process. Such comments, including recommendations for project modifications, may be considered and weighed by the decision makers as part of their decision to approve, modify, or disapprove the project.

Comment GC-3: Support, Opposition, and Opinions Related to the Project

Response GC-3, p. 10.10-6, addresses the following comments, which are quoted below:

A-Diamond.3, A-SFBOS.2, A-Tanner.3

“I also, on a separate note, want to say even though we don't get to approve the project, we just certify the EIR, that I'm extremely excited about this project. It opens up an incredible resource to a much broader swath of the community. It's a very, very intense use of the site in the sense that it allows for multiple uses. And I appreciate that the project designers are trying to ensure that this facility appeal to as many people as possible. And that strikes me as particularly important as we embark on an effort, you know, as we're seeing with the housing element to increase density, probably on the west side, that we need to make sure that we have increased recreational facilities as well too. So, I am very excited to see this project come to fruition. So thank you.” (Sue Diamond, Commissioner, San Francisco Planning Commission [A-Diamond.3])

“But it also provides recreational opportunities for young people and old people and everything in between in our city. And specifically for the Pacific Rowing Club folks, who have been growing in their participation in those activities over the last few years.

So this EIR we support. We do not support the partial alternative or the no alternative. Obviously Lake Merced has been neglected for a long time. Over the years we've been able to clean up the lead, to do a bunch of improvements, the boathouse, that are just sorely needed. However, I'm here to just put on the record that the project that is proposed as, you know, the full project alternative is not necessarily what the community supports.” (Myrna Melgar, City and County of San Francisco District 7 Supervisor [A-SFBOS.2])

10. Responses to Comments

10.10 General Comments

“The only thing I can say, I really can't wait to go to this park. It looks really fun. That's pretty much my only comment. It's not really EIR centric, but I'll look to other commissioners.” (Rachael Tanner, President, San Francisco Planning Commission [A-Tanner.3])

RESPONSE GC-3

The comments presented above generally express statements of support or opinions concerning the merits of the project. Comments expressing support for or general opinions about the project do not raise specific issues concerning the adequacy or accuracy of the EIR's discussion of physical impacts. However, such comments may be considered and weighed by the decision makers as part of their decision to approve, modify, or disapprove the project.

CHAPTER 11

DRAFT EIR REVISIONS

11.1 Introduction

This chapter presents text revisions to the Lake Merced West Project (project) draft environmental impact report (EIR), which was published on February 23, 2022. Additions to the EIR to address inclusion of the project variant are contained in Chapter 8, Project Variant and not addressed below. Revisions in this chapter include both (1) changes made to text, tables, or figures in response to comments on the draft EIR, as identified in Chapter 10, Responses to Comments; and (2) San Francisco Planning Department staff-initiated text changes to correct minor inconsistencies, to add minor information or clarification related to the project, and to provide updated information where applicable.

This chapter includes all revisions by reproducing the relevant excerpt of the draft EIR in the sequential order by the chapter, section, and page that it appears in the document. Preceding each revision is a brief explanation for the text change, either identifying the corresponding response codes, such as Response PD-1, where the issue is discussed in Chapter 10 or indicating the reason for a staff-initiated change. Deletions in text and tables are shown in strikethrough (~~strikethrough~~) and new text is shown in double-underline (double-underline).

None of the revisions result in substantial changes in the analysis or conclusions presented in the draft EIR. These revisions do not constitute “new information of substantial importance” within the meaning of CEQA Guidelines section 15162(a)(3); therefore, recirculation of the draft EIR is not required.

11.2 Revisions to Summary

The text of Mitigation Measure M-CR-1c: Interpretive Program on p. S-13 in Table S-1 has been revised as discussed in Response TC-1 to clarify that the mitigation measure includes the local Native Americans as part of the larger social and cultural history of Lake Merced, as follows:

Mitigation Measure M-CR-1c: Interpretive Program

The RPD shall facilitate the development of an interpretive program focused on the history of the project site as a recreational shooting range. The interpretive program should be developed and implemented by a qualified preservation professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner. Coordination with local artists and interested parties, including local California Native American representatives, should occur, as feasible. The primary goal of the program is to educate visitors about the property’s historical themes, associations, and lost contributing features within broader historical, social, and physical landscape contexts, including its longer and more expansive history and association with Lake Merced as a recreational and agricultural site used by many people over time, including the Ramaytush Ohlone. One possible location for interpretation would be the skeet field that is to be retained and reused as a picnic area.

11. Draft EIR Revisions

11.3. Revisions to Chapter 2, Project Description

This program shall be initially outlined in a proposal for a Historic Resources Public Interpretive Plan subject to review and approval by planning department preservation staff. The plan shall include the general parameters—substance, media, and other elements—of the interpretive program, which shall include in publicly accessible areas of the project site a permanent display(s) of interpretive materials concerning the history and architectural features of the historical resource (both the site as a whole and the individual contributing buildings and features). The interpretive plan should also explore contributing to publicly accessible digital platforms.

The detailed content, display materials, and other characteristics of such an interpretive program shall be reviewed and approved by planning department staff before the issuance of a Temporary Certificate of Occupancy.

The text of Mitigation Measure M-CR-1d: Oral Histories on p. S-14 in Table S-1 has been revised to clarify the methods of collecting oral histories as follows:

Mitigation Measure M-CR-1d: Oral Histories

The RPD and the SFPUC shall retain the services of a qualified historian to undertake an oral history of the Pacific Rod and Gun Club and shall make a good-faith effort to publicize the oral history project, conduct public outreach, and identify a wide range of potential interviewees. The RPD and the SFPUC shall employ a range of measures that may include ~~installing booths~~ conducting interviews to that allow participants to record their recollections, and/or hosting a website or providing other means for that allows interviewees to contribute oral histories remotely. This oral history project shall consist of interviews of and recollections by members of the Pacific Rod and Gun Club if possible, and could include a video tour explaining the activities that took place on the site. The success of this effort will depend primarily on the ability of the RPD and the SFPUC to locate such persons, and on their willingness and ability to participate. Before undertaking this effort, the scope and methodology of the oral history project shall be reviewed and approved by planning department preservation staff.

In addition to potentially being used for the onsite interpretive program, the recordings made for the oral history project shall be transcribed, indexed, and made available to the public at no charge through the planning department and other archives and repositories to allow for remote historical interpretation of the site.

11.3 Revisions to Chapter 2, Project Description

As discussed in Response PD-4, the description of proposed landscaping on p. 2-12 has been revised as follows to clarify the types of vegetation proposed:

LANDSCAPE FEATURES

Landscape restoration work was completed throughout the site as a part of the soil remediation project and would be retained as part of the Lake Merced West project where feasible. New trees, shrubs, and other vegetation would be planted along John Muir Drive, adjacent to the pedestrian entry and exits, and at selected locations within the project site (west of the community building, near the boathouse loading area; refer to Figure 2-3). All new vegetation would be native to

California. Some permanent vegetation and tree removal would occur in areas of new facilities or at site entrances, mainly in upland areas, and other existing vegetation disturbed during construction would be replaced upon completion of construction. An open metal fence that provides views through the site would be installed along the project boundary adjacent to John Muir Drive.

To clarify that there would be two entrances to the site from John Muir drive, the last paragraph on draft EIR p. 2-21 is revised as follows:

The SFPUC arborist team, with approximately six existing employees, would operate an office on the project site and store equipment and vehicles at the yard. Typically, the arborist office and yard would operate between 6:30 a.m. and 3 p.m. Monday through Friday. A ~~separate~~ second entrance driveway from John Muir Drive would provide access to the arborist office and yard. Arborists would be dispatched from the facility to perform work at sites across the city. Minor maintenance of vehicles and equipment would occur in the covered equipment parking area.

11.4 Revisions to Section 3.2, Historical Architectural Resources

The text of Mitigation Measure M-CR-1c: Interpretive Program on p. 3.2-31 has been revised as discussed in Response TC-1 to clarify that the mitigation measure includes the local Native Americans as part of the larger social and cultural history of Lake Merced, as follows:

Mitigation Measure M-CR-1c: Interpretive Program

The RPD shall facilitate the development of an interpretive program focused on the history of the project site as a recreational shooting range. The interpretive program should be developed and implemented by a qualified preservation professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner. Coordination with local artists and interested parties, including local California Native American representatives, should occur, as feasible. The primary goal of the program is to educate visitors about the property's historical themes, associations, and lost contributing features within broader historical, social, and physical landscape contexts, including its longer and more expansive history and association with Lake Merced as a recreational and agricultural site used by many people over time, including the Ramaytush Ohlone. One possible location for interpretation would be the skeet field that is to be retained and reused as a picnic area.

This program shall be initially outlined in a proposal for a Historic Resources Public Interpretive Plan subject to review and approval by planning department preservation staff. The plan shall include the general parameters—substance, media, and other elements—of the interpretive program, which shall include in publicly accessible areas of the project site a permanent display(s) of interpretive materials concerning the history and architectural features of the historical resource (both the site as a whole and the individual contributing buildings and features). The interpretive plan should also explore contributing to publicly accessible digital platforms.

The detailed content, display materials, and other characteristics of such an interpretive program shall be reviewed and approved by planning department staff before the issuance of a Temporary Certificate of Occupancy.

11. Draft EIR Revisions

11.5. Revisions to Chapter 5, Alternatives

The text of Mitigation Measure M-CR-1d: Oral Histories on p. 3.2-31 has been revised to clarify the methods of collecting oral histories as follows:

Mitigation Measure M-CR-1d: Oral Histories

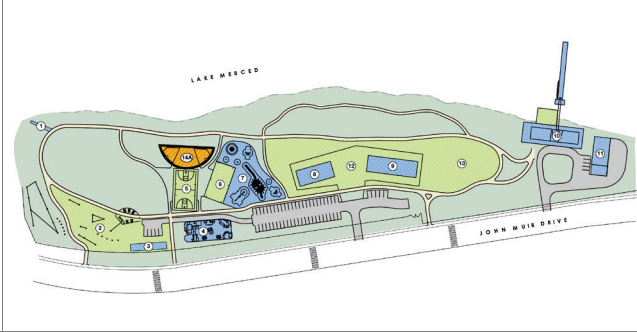
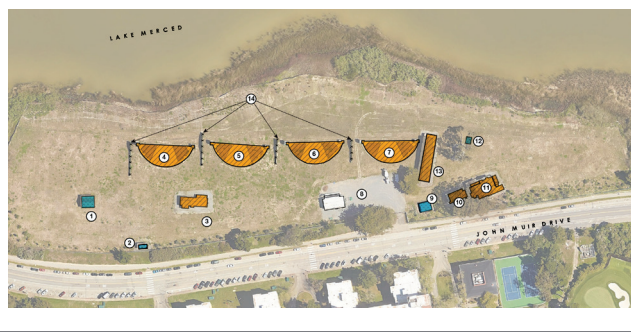
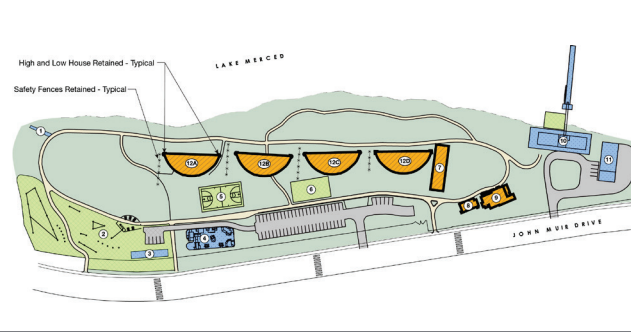
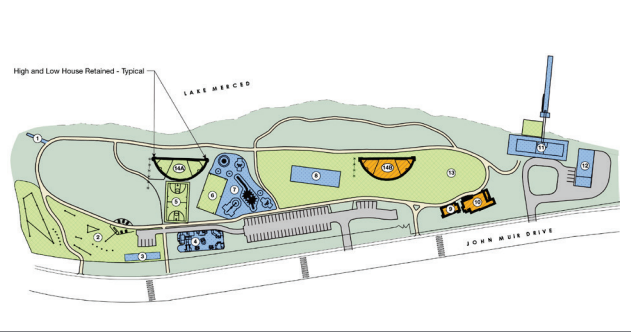
The RPD and the SFPUC shall retain the services of a qualified historian to undertake an oral history of the Pacific Rod and Gun Club and shall make a good-faith effort to publicize the oral history project, conduct public outreach, and identify a wide range of potential interviewees. The RPD and the SFPUC shall employ a range of measures that may include ~~installing booths~~ conducting interviews to that allow participants to record their recollections, and/or hosting a website or providing other means for that allows interviewees to contribute oral histories remotely. This oral history project shall consist of interviews of and recollections by members of the Pacific Rod and Gun Club if possible, and could include a video tour explaining the activities that took place on the site. The success of this effort will depend primarily on the ability of the RPD and the SFPUC to locate such persons, and on their willingness and ability to participate. Before undertaking this effort, the scope and methodology of the oral history project shall be reviewed and approved by planning department preservation staff.

In addition to potentially being used for the onsite interpretive program, the recordings made for the oral history project shall be transcribed, indexed, and made available to the public at no charge through the planning department and other archives and repositories to allow for remote historical interpretation of the site.

11.5 Revisions to Chapter 5, Alternatives

As discussed in Response AL-1, to clarify and amplify the comparison of the project and alternatives, draft EIR Table 5-1, p. 5-5, has been revised to include diagrams of the alternatives, as shown on p. 11-5.

Table 5-1 Comparison of the Project and Alternatives^a

				
Project Component/Structure	Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
Existing Clubhouse	Demolish	Retain and secure to prevent unwanted entry, same as current conditions	Rehabilitate to Secretary's Standards ^b	Rehabilitate to Secretary's Standards
Rifle Range Building	Demolish		Rehabilitate to Secretary's Standards	Demolish
Caretaker's House	Demolish		Rehabilitate to Secretary's Standards	Rehabilitate to Secretary's Standards
Shell House	Demolish		Demolish	Demolish
Skeet Fields 4-7 and Associated Elements (high and low houses, safety fences)	Repair skeet field 4; demolish all high/low houses and other skeet fields		Retain all four skeet fields and use as open space; retain all safety fences and high/low houses	Retain two of the four skeet fields and use as picnic or open space areas; retain high/low houses and the safety fences associated with skeet fields 4 and 7
Contributing Features Retained ^{ab}	Less than 1	8 of 8	7 of 8	4 of 8
Approximate Building Square Footage Retained	None	8,910 square feet	6,550 square feet	3,920 square feet
New Buildings—Total Number/Gross Square Feet	5/Approximately 16,300 square feet	0/0 square feet	3/Approximately 7,800 square feet	4/Approximately 12,800 square feet
Range of Site Uses	<ul style="list-style-type: none"> Community building Restaurant with patio and terrace Open space Boathouse, dock, soft landing City arborist office and yard Skate park, ropes course, and restrooms Sport courts (2-3) Playground Picnic areas 	Equipment storage Site would be closed to the public	<ul style="list-style-type: none"> Community building (smaller) Restaurant (smaller), no patio or terrace Open space Boathouse, dock, soft landing City arborist office and yard Skate park, ropes course, and restrooms Sport courts (2) 	<ul style="list-style-type: none"> Community building (smaller) Restaurant, no patio or terrace Open space Boathouse, dock, soft landing City arborist office and yard Skate park, ropes course, and restrooms Sport courts (2) Playground Picnic areas

NOTES:

^a Refer to Figures 3.2-6, 5-1, 5-2 and 5-3 for full-scale versions of the images shown.

^{ab} Contributing features are site features that add to the historic associations, historic architectural qualities, or archeological values for which a property is significant. Refer to Figure 5-1 (p. 5-7) and Table 3.2-2 in Section 3.2, Historical Architectural Resources (p. 3.2-17), for additional information about contributing features.

^b The Secretary's Standards are the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings.

SOURCE: Data compiled by Environmental Science Associates in 2021

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APPENDIX I

COMMENTS ON THE DRAFT EIR

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Table I-1 Written Comments from Agencies, Organizations, and Individuals

Commenter Code	Name and Title of Commenter	Format	Comment Number	Topic Code
AGENCIES				
A-CCC	Peter Benham, North Central Coastal Planner, California Coastal Commission	E-mail, April 5, 2022	1	BI-2: Aquatic Resources, Riparian Habitat and Wetlands
			2	BI-1: Special-Status and Native Plants
			3	BI-2: Aquatic Resources, Riparian Habitat and Wetlands
			4	BI-2: Aquatic Resources, Riparian Habitat and Wetlands
			5	PD-1: Public Access
			6	AE-1: Aesthetics Impacts
A-Diamond	Sue Diamond, Commissioner, San Francisco Planning Commission	Public Hearing, March 31, 2022	1	GC-2: EIR Process
			2	PD-2: Boathouse and Rowing
			3	GC-3: Support, Opposition, and Opinions Related to the Project
A-HPC	San Francisco Historic Preservation Commission	Letter March 16, 2022	1	TC-1: Tribal Cultural Resources
			2	AL-1: Alternatives Analysis
			3	TC-1: Tribal Cultural Resources
			4	PD-3: Project Implementation
			5	PD-3: Project Implementation
			6	PD-4: Project Objectives
A-Imperial	Theresa Imperial, Commissioner, San Francisco Planning Commission	Public Hearing, March 31, 2022	1	PD-2: Boathouse and Rowing
			2	BI-3: Biological Resources Assessment
			3	PD-1: Public Access
			4	PD-3: Project Implementation
A-Koppel	Joel Koppel, Commissioner, San Francisco Planning Commission	Public Hearing, March 31, 2022	1	GC-2: EIR Process
A-Moore	Kathrin Moore, Commissioner, San Francisco Planning Commission	Public Hearing, March 31, 2022	1	PD-2: Boathouse and Rowing
			2	TC-1: Tribal Cultural Resources
			3	AL-1: Alternatives Analysis
			4	BI-2: Aquatic Resources, Riparian Habitat, and Wetlands
			5	PD-1: Public Access
			6	PD-3: Project Implementation
			7	PD-3: Project Implementation

Table I-1 Written Comments from Agencies, Organizations, and Individuals (Continued)

Commenter Code	Name and Title of Commenter	Format	Comment Number	Topic Code
AGENCIES (CONT.)				
A-Moore (cont.)			8	AL-1: Alternatives Analysis
			9	TR-1: Transportation Impacts
			10	BI-4: Impacts on Birds
			11	AE-1: Aesthetics Impacts
A-SFBOS	Myrna Melgar, Supervisor, District 7	Public Hearing, March 31, 2022	1	GC-2: EIR Process
			2	GC-3: Support, Opposition, and Opinions Related to the Project
			3	PD-2: Boathouse and Rowing
A-Tanner	Rachael Tanner, President, San Francisco Planning Commission	Public Hearing, March 31, 2022	1	GC-2: EIR Process
			2	PD-2: Boathouse and Rowing
			3	GC-3: Support, Opposition, and Opinions Related to the Project
			4	AE-1: Aesthetics Impacts
ORGANIZATIONS				
O-CNPS	Eddie Bartley, President Paul Bouscal, Vice President; Beth Cataldo, Volunteering; Sophie Constantinou, Secretary; Elliot Goliger, Horticulture; Bob Hall, Treasurer; Libby Ingalls, Newsletter Production; Susan Karasoff, Outreach; Susan Mullaney, Plantsgiving; Jake Sigg, Conservation; Noreen Weeden, Programs; California Native Plant Society	Letter via E-mail, April 11, 2022	1	BI-1: Special-Status and Native Plants
			2	PD-4: Project Objectives
			3	BI-1: Special-Status and Native Plants
			4	BI-4: Impacts on Birds
			5	GC-1: Community Collaboration or Coordination
O-GGAS	Whitney Grover, Chair, San Francisco Conservation Committee, Golden Gate Audubon Society, Board Member	Letter via E-mail, April 11, 2022	1	BI-4: Impacts on Birds

Table I-1 Written Comments from Agencies, Organizations, and Individuals (Continued)

Commenter Code	Name and Title of Commenter	Format	Comment Number	Topic Code
INDIVIDUALS				
I-Allen	Dick Allen	E-mail, March 5, 2022	1	PD-2: Boathouse and Rowing
I-Austin	Brenda A. Austin	Letter via E-mail, April 6, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Aviva	Aviva	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Ballantyne	Maisy Ballantyne	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Blachford	Sedi Blachford	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Blazej	Robert Blazej	E-mail, April 6, 2022	1	PD-2: Boathouse and Rowing
I-Blee	Patricia Blee	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Boushey	Homer and Virginia Boushey	E-mail, April 5, 2022	1	PD-2: Boathouse and Rowing
I-Boyd	Kate Boyd	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Brownell	Gail Brownell	E-mail, March 28, 2022	1	PD-2: Boathouse and Rowing
			2	PD-2: Boathouse and Rowing
			3	HY-1: Hydrology and Water Quality
			4	PD-2: Boathouse and Rowing
			5	PD-2: Boathouse and Rowing
			6	PD-2: Boathouse and Rowing
			7	GC-1: Community Collaboration or Coordination
I-Caliandro	Andrea Caliandro	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Callahan	Christina Callahan	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Callies-1	Gavin Callies	Public Hearing, March 31, 2022	1	PD-2: Boathouse and Rowing
I-Callies-2	Gavin Callies	E-mail, April 10, 2022	1	PD-2: Boathouse and Rowing
I-Carman_E	Eric Carman	E-mail	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Carman_I	Isabelle Carman	E-mail	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Casement	Chloe Casement	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing

Table I-1 Written Comments from Agencies, Organizations, and Individuals (Continued)

Commenter Code	Name and Title of Commenter	Format	Comment Number	Topic Code
INDIVIDUALS (CONT.)				
I-Chen	Jayne Chen	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Cho	Tami Cho	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Chu	Eva Chu	E-mail, April 10, 2022	1	PD-2: Boathouse and Rowing
I-Downey	Patty Downey	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Eigers	The Eigers	E-mail, April 7, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-England	James England	E-mail, March 30, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Foster	Doug Foster	E-mail, April 4, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Gabalda	Gregoire Gabalda	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Garnett	Eben Garnett	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Gelman	Marina Gelman	E-mail, March 30, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Griffith	Maddy Griffith	E-mail, March 31, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Hagiwara	Nina Hagiwara	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Hall	Robert Hall	E-mail, April 11, 2022	1	BI-4: Impacts on Birds
I-Harrington	Matthew Harrington	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Harris	Jonathan Harris	E-mail, April 14, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Holcomb	Debra Holcomb	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Howard-1	Andrew Howard	Public Hearing, March 31, 2022	1	NO-1: Noise Impacts
I-Howard-2	Andrew Howard	E-mail, March 31, 2022	1	NO-1: Noise Impacts

Table I-1 Written Comments from Agencies, Organizations, and Individuals (Continued)

Commenter Code	Name and Title of Commenter	Format	Comment Number	Topic Code
INDIVIDUALS (CONT.)				
I-Johansen	Genevieve Johansen	E-mail, March 30, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Johnson-1	Adrian Johnson	E-mail, March 30, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Johnson-2	Adrian Johnson	E-mail, April 4, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Kahn-Kirby	Amanda Kahn-Kirby	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
			2	GC-1: Community Collaboration or Coordination
I-Keene	Amanda Keene	E-mail, April 10, 2022	1	PD-2: Boathouse and Rowing
I-Khaishgi	Ahmed Khaishgi	E-mail, April 2, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Kirby	Mason Kirby	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Koenig_E	Emily Koenig	Public Hearing, March 31, 2022	1	PD-2: Boathouse and Rowing
I-Koenig_P	Peter Koenig	E-mail, April 9, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Lambert-1	Leslie Lambert	Public Hearing, March 31, 2022	1	PD-2: Boathouse and Rowing
I-Lambert-2	Leslie Lambert	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Li	Joan's Li	E-mail, March 31, 2022	1	PD-2: Boathouse and Rowing
I-Luongo_H	Heather Luongo	E-mail, April 10, 2022	1	PD-2: Boathouse and Rowing
I-Luongo_P	Phil Luongo	E-mail, April 10, 2022	1	PD-2: Boathouse and Rowing
I-Lynch_H	Harrison Lynch	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Lynch_S	Sarah Lynch	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Matsumura_D	Diane Y. Matsumura	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Matsumura_R	Robert Matsumura	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-McGahey	Elena Marron McGahey	E-mail, April 4, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing

Table I-1 Written Comments from Agencies, Organizations, and Individuals (Continued)

Commenter Code	Name and Title of Commenter	Format	Comment Number	Topic Code
INDIVIDUALS (CONT.)				
I-McManus	Katrin McManus	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-McNulty	Carolyn McNulty	E-mail, April 3, 2022	1	PD-2: Boathouse and Rowing
I-Miller	Tim Miller	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Milner	David Milner	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Moreland	Chip Moreland	E-mail, April 10, 2022	1	PD-3: Project Implementation
I-Morten	Dick Morten	E-mail, March 3, 2022	1	PD-2: Boathouse and Rowing
I-Murphy	Bart Murphy	Public Hearing, March 31, 2022	1	GC-1: Community Collaboration or Coordination
I-Nelson	Sam Nelson	Public Hearing, March 31, 2022	1	PD-2: Boathouse and Rowing
I-Niclas	Josh Niclas and Adrienne Fratini	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Okon	Christine Okon	E-mail March 31, 2022	1	BI-4: Impacts on Birds
			2	BI-4: Impacts on Birds
			3	BI-4: Impacts on Birds
			4	BI-2: Aquatic Resources, Riparian Habitat and Wetlands
			5	BI-4: Impacts on Birds
I-O'Neill	Shannon O'Neill	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Panasik	Jen Panasik	E-mail, April 10, 2022	1	PD-2: Boathouse and Rowing
I-Paras	Chris Paras	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Paul	Mike Paul	E-mail, March 31, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Perry	Racheal Perry	E-mail, April 11, 2022	1	PD-2: Boathouse and Rowing
I-Petitt	Claire and Saskia Petitt	E-mail, March 31, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Post	William N. Post	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Powell-1	Wes Powell	Public Hearing, March 31, 2022	1	PD-2: Boathouse and Rowing
			2	GC-1: Community Collaboration or Coordination

Table I-1 Written Comments from Agencies, Organizations, and Individuals (Continued)

Commenter Code	Name and Title of Commenter	Format	Comment Number	Topic Code
INDIVIDUALS (CONT.)				
I-Powell-2	Wes Powell	E-mail, April 4, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
			3	PD-2: Boathouse and Rowing
			4	PD-2: Boathouse and Rowing
			5	GC-1: Community Collaboration or Coordination
I-Rich	Rich	Public Hearing, March 31, 2022	1	PD-2: Boathouse and Rowing
I-Rosen	Jenny Rosen	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Rosenblum_K	Kim Rosenblum	E-mail, March 30, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Rosenblum_S	Sam Rosenblum	E-mail, March 30, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Ruiz	Lynda M. Ruiz	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Sanders	Doug Sanders	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Scott	Jan Scott	E-mail, March 30, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Smith	Amelia Smith	E-mail, March 30, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Tucker	David and Pat Tucker	E-mail, April 5, 2022	1	PD-2: Boathouse and Rowing
I-Vasquez	Nick Vasquez	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Vaughan	Sheila Vaughan	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing
I-Walti-1	Mary and Joshua Walti	E-mail, April 10, 2022	1	PD-2: Boathouse and Rowing
I-Walti-2	Mary Walti	E-mail, March 31, 2022	1	PD-2: Boathouse and Rowing
I-Wawrzonek	Christian Wawrzonek	Public Hearing, March 31, 2022	1	PD-2: Boathouse and Rowing

Table I-1 **Written Comments from Agencies, Organizations, and Individuals (Continued)**

Commenter Code	Name and Title of Commenter	Format	Comment Number	Topic Code
INDIVIDUALS (CONT.)				
I-Will	Ben Will	E-mail, April 4, 2022	1	PD-2: Boathouse and Rowing
I-Wisner	Penni Wisner	E-mail, April 9, 2022	1	PD-2: Boathouse and Rowing
I-Yeh	Jenny Yeh	E-mail, April 11, 2022	1	GC-1: Community Collaboration or Coordination
			2	PD-2: Boathouse and Rowing

From: [Moore, Julie \(CPC\)](#)
To: [CPC.LakeMercedWestEIR](#); [Cooper, Rick \(CPC\)](#); [Karen Lancelle](#)
Subject: FW: Lake Merced West Project, DEIR Comments
Date: Tuesday, April 5, 2022 3:51:30 PM
Attachments: [image001.png](#)
[CEQA NOP - Lake Merced West Recreational Facility.msg](#)

From: Benham, Peter@Coastal <peter.benham@coastal.ca.gov>
Sent: Tuesday, April 05, 2022 3:47 PM
To: Moore, Julie (CPC) <julie.moore@sfgov.org>
Cc: Townes, Chris (REC) <chris.townes@sfgov.org>; Suen, Jackie (REC) <jackie.suen@sfgov.org>; KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>; Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>
Subject: Lake Merced West Project, DEIR Comments

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Ms. Moore,

Thank you for the opportunity to review the Draft EIR for the Lake Merced West Project, which includes demolishing existing buildings; remediating contaminated soils; and developing a recreational facility consisting of trail use, picnicking, paddle-boarding, kayaking, fishing, fitness activities, a ropes course, bird watching, outdoor exercise area, skateboarding, multi-use courts for basketball and other activities, restaurant dining, a new community building, boathouse, arborist office, and new restrooms at the site located at 520 John Muir Drive in San Francisco. We have several follow-up comments from our past comments made during the Notice of Preparation phase of the environmental impact report (attached).

1. Appendix H2 "Aquatic Resources Delineation" acknowledges the state definition of a one parameter wetland, however the document appears only to establish the extent of state wetlands through the one parameter of hydrophytic vegetation. Please also include in the analysis and calculation of state wetlands the additional parameters that provide wetland indicators, including presence of hydric soils and wetland hydrology, for a complete estimate of the amount of wetland acreage.
2. The Biological Resource Assessment included as Appendix H1 states that surveys were done in December, outside the flowering/identifiable phase of some plants species. Please complement this survey with additional information from a survey performed in the spring, to insure that no special status plant species are missed.
3. The following comments are associated with Impact BI-3 "The project would have a substantial adverse effect on California Department of Fish and Wildlife-designated sensitive natural communities, riparian habitat or jurisdictional wetlands or waters."
 - a. Please provide a definition and analysis of the expected acreage of both temporary and permanent impacts expected as outcomes of this project. In the past the Commission

1
BI-2

2
BI-1

3
BI-2

has defined “Temporary” impacts as to those impacts where there is no significant ground disturbance or killing of native vegetation and the vegetation recovers to its pre-disturbance state within one year, while “Permanent” impacts include anything else.

3 cont.
BI-2

b. The 1:1 mitigation suggested for Impact BI-3 is not sufficient, particularly for permanent impacts to wetlands. The Commission has generally used mitigation ratios of 3:1 (acres mitigated: acres impacted) for permanent ESHA impacts and 4:1 for permanent wetland impacts, and these ratios assume that resources are being compensated for through either habitat creation or substantial restoration. With wetlands, there is an added expectation of no net loss of acreage per State of California Executive Order W-59-93. The Commission has detailed guidance on impact mitigation, and we would be happy to follow-up with more details on what might be appropriate given the scope of this project.

4
BI-2

4. Regarding low-cost low-cost visitor-serving uses please provide more information on whether any parts of the proposed project will require fees to use or enter.

5
PD-1

5. Related to the Visual Impact Assessment(Impact AE-1 and AE-2), please provide more analysis of the potential visual impact on the character of the Lake Merced Area, including more visual simulations, such as a simulation of what the proposed project might look like from boaters on the lake, and a description of how the design is intended to blend with the natural character of the area. While it appears that there will be no large buildings or other structures in the proposed project, it will still be important to analyze the impact of the new structures that will be added, such as the restaurant, boat houses and dock, and playground.

6
AE-1

This concludes our comments at this time, and we look forward to reviewing the California Coastal Commission Coastal Development Permit application when it is submitted.

Peter Benham
North Central Coastal Planner
California Coastal Commission





March 16, 2022

Ms. Lisa Gibson
Environmental Review Officer
San Francisco Planning Department
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

Dear Ms. Gibson,

On March 16, 2021, the Historic Preservation Commission (HPC) held a public hearing for the Commissioners to hear public testimony and to provide comments to the San Francisco Planning Department on the Draft Environmental Impact Report (DEIR) for the proposed Lake Merced West project at 520 John Muir Drive on the site of the Pacific Rod and Gun Club (2019-014146ENV). After discussion, the HPC arrived at the comments below on the DEIR:

- The HPC found the analysis of historic resources in the DEIR to be accurate. Although the HPC understands the period of significance relates to the history and use of the site by the Pacific Rod and Gun Club, Commissioners wanted to acknowledge the site’s prior use and significance to the wider community, for example the Ramaytush Ohlone. This is in line with the HPC’s priority of reviewing issues through a racial and social equity lens.
- The HPC agreed that the DEIR analyzed a reasonable and appropriate range of preservation alternatives to address historic resource impacts.
- Some Commissioners expressed a preference for the Partial Preservation Alternative as it was closer to the proposed project. Commissioner Black expressed a preference for the Partial Preservation Alternative as it met more of the programmatic objectives of the proposed project. Commissioner So appreciated how the Partial Preservation Alternative accommodated elements of the proposed project through adaptive reuse of some of the contributing buildings on the site.
- Other Commissioners preferred the Full Preservation Alternative given the unique nature of the site. Commissioner Nageswaran expressed her preference for the Full Preservation Alternative as it retained more original features of the complex while Commissioner Wright acknowledged that the Full Preservation Alternative was the only alternative that reduced impacts to a less-than-significant level (aside from the no project alternative).
- Commissioner Wright was curious to know why the Shell House was not incorporated within the preservation alternatives and wondered if it would be possible to construct an addition to the rifle range building in one of the alternatives.

1
TC-1

2
AL-1

- The HPC expressed the importance of having the mitigation measures also tell the stories of the Ramaytush Ohlone as part of the larger social and cultural history of Lake Merced. Commission President Matsuda reinforced the larger cultural stories that could be told about this site as a significant cultural landscape were important and would be in line with the HPC's resolution centering racial and social equity.
- Commissioner Foley suggested the use of QR codes as a way to provide access to interpretive displays around the site.

3
TC-1
4
PD-3

HPC Comments on the Proposed Project

- Commissioners expressed their support for the proposed project that would open up the site to a much wider audience than its existing closed state and previous use as a shooting range.
- Commissioner Nageswaran expressed her concern about the timing of the phasing of the project and said it would be regretful if the site were to be demolished only to not find a concessionaire for the site.
- Commissioner Black expressed her support for the design direction of the proposed project.

5
PD-3

General Comments

- Commission President Matsuda requested that commissioners go on site visits in instances where the site has been closed off to the public for an extended period of time.
- Commission President Matsuda suggested that a project objectives include acknowledging and interpreting the site's history and significance.

6
PD-4

The HPC appreciates the opportunity to participate in review of this environmental document.

April 11, 2021

Julie Moore, EIR Coordinator
San Francisco Planning Department
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
CPC.LakeMercedWestEIR@sfgov.org



Re: **Lake Merced West Draft EIR, Case # 2019-014146ENV**

Dear Julie Moore:

The California Native Plant Society, Yerba Buena chapter respectfully submits these comments on the draft EIR. The Yerba Buena Chapter of the California Native Plant Society is a non-profit organization with over 650 members in San Francisco and Northern San Mateo County. Our parent organization has over 10,000 members statewide. The mission of CNPS is to conserve California native plants and their natural habitats, and increase understanding, appreciation, and horticultural use of native plants. Our vision includes a future where Californians can experience thriving biological diversity, even in human-altered landscapes.

Lake Merced is a natural history wonder that features seven locally rare plants. ¹The draft EIR does not call for any mitigation yet the project will be removing both native and non-native vegetation.

1
BI-1

The botanical surveys should be conducted during the spring and summer to ensure all plant species in particular, all annuals are included and evaluated. One example is *piperia michaelii*, Michael’s rein orchid, a rare plant of dry slopes at Lake Merced which flowers April-August. This plant, if present in the project site would have been missed in a December survey. These local, native plants are hosts for butterflies, and provide food or nesting material for birds and other species. It is important that all of the plant species are fully analyzed.

San Francisco’s Biodiversity Resolution called for ² “establishing local biodiversity as a citywide priority, with a framework for inter-agency collaboration for nature based initiatives.” This SFPUC and SFRPD site should be planted only with local, native plants. CNPS Yerba Buena encourages the removal of non-native invasive species and replacing these by planting, monitoring and supporting local, native species in their place. Lake Merced has 111 non-native plant taxa. ³ The project map depicts Eucalyptus and Himalayan blackberry, Italian Thistle and Ice plant; here are opportunities for replacing these exotic species with local, native plants.

2
PD-4

The EIR should address how this project and the proposed recreation will protect the native plant species at Lake Merced (See appendix attached and on our letter dated July 9, 2021 for a list of plants). Which plants will be reintroduced or restored? What mitigation measures are being taken for any native plants removed or destroyed during this project? How will any native plants removed for the project impact the local insects and bird populations?

3
PD-4
4
BI-1
5
BI-4

¹ <https://www.wood-biological.com/san-francisco-plant-checklist/annotated-checklist-3rd-edition/>
² <https://sfbos.org/sites/default/files/r0107-18.pdf>
³ <https://www.wood-biological.com/san-francisco-plant-checklist/annotated-checklist-3rd-edition/>

2022.04.11 CNPS YB comments on Lake Merced Westside EIR

Lake Merced is an important and fragile ecological resource. Despite encroaching urbanization, watershed changes, fragmentation, and aquifer reduction since the twentieth century, the lake remains a unique habitat supporting riparian, dune scrub, and woodland forest natural communities. CNPS Yerba Buena chapter looks forward to working with you on this project.

6
GC-1

Sincerely,

California Native Plant Society, Yerba Buena Chapter board members:

Eddie Bartley, President
 Paul Bouscal, Vice President
 Beth Cataldo, Volunteering
 Sophie Constantinou, Secretary
 Elliot Goliger, Horticulture
 Bob Hall, Treasurer
 Libby Ingalls, Newsletter Production
 Susan Karasoff, Outreach
 Susan Mullaney, Plantsgiving
 Jake Sigg, Conservation
 Noreen Weeden, Programs

Appendix

The following is a list of plant species extant at Lake Merced AND which appear on the 2021 list of locally significant species.

It's important to note that these occurrences can be from any place around the lake. It does not mean that they occur or could occur at the project site.

Mike Wood, Botanist and CNPS Yerba Buena Chapter Rare Plants Chair

Extant Species at Lake Merced (per 2021 checklist)	Locally Significant Rating (2015)*
<i>Abronia latifolia</i>	B
<i>Acaena pinnatifida</i> var. <i>californica</i>	C
<i>Acmispon americanus</i> var. <i>americanus</i>	A2
<i>Alnus rubra</i>	A2
<i>Ambrosia chamissonis</i>	C
<i>Amsinckia intermedia</i>	A2
<i>Aminckia spectabilis</i> var. <i>spectabilis</i>	B
<i>Aphyllon fasciculatum</i>	B
<i>Arbutus menziesii</i>	C
<i>Aristolochia californica</i>	A2
<i>Asarum caudatum</i>	Listing warranted

2022.04.11 CNPS YB comments on Lake Merced Westside EIR

<i>Castilleja wightii</i>	A2
<i>Chorizanthe cuspidata</i> var. <i>cuspidata</i>	A1
<i>Cirsium occidentale</i> var. <i>occidentale</i>	B
<i>Cornus sericea</i> ssp. <i>sericea</i>	B
<i>Cyperus esculentus</i>	A2
<i>Dudleya farinosa</i>	C
<i>Elymus xvancouverensis</i>	A2
<i>Epilobium minutum</i>	A2
<i>Equisetum laevigatum</i>	A1
<i>Ericameria ericoides</i>	C
<i>Erysimum capitatum</i>	A2
<i>Erysimum franciscanum</i>	A2
<i>Euphorbia crenulata</i>	A2
<i>Euthamia occidentalis</i>	B
<i>Festuca microstachys</i>	A2
<i>Festuca octoflora</i>	A2?
<i>Galium californicum</i> var. <i>californicum</i>	A2
<i>Galium trifidum</i> var. <i>columbianum</i>	A2
<i>Garrya elliptica</i>	A2
<i>Gilia capiata</i> ssp. <i>chamissonis</i>	A1
<i>Grindelia hirsutula</i>	A2
<i>Hydrocotyle verticillata</i>	A2
<i>Lathyrus littoralis</i>	A1
<i>Lupinus chamissonis</i>	C
<i>Maianthemum stellatum</i>	A2
<i>Marah oregon</i>	A2
<i>Oenothera elata</i> ssp. <i>hookeri</i>	C
<i>Persicaria amphibia</i>	B
<i>Piperia michaelii</i>	A1
<i>Poa douglasii</i>	B
<i>Poa pratensis</i> ssp. <i>pratensis</i>	Listing warranted
<i>Prunus virginiana</i> var. <i>demissa</i>	B
<i>Quercus chrysolepis</i>	A2
<i>Ranunculus californicus</i> var. <i>cuneatus</i>	Listing warranted
<i>Ribes divaricatum</i> var. <i>publiflorum</i>	B
<i>Rubus parviflorus</i>	C
<i>Rumex occidentalis</i>	A2
<i>Salix laevigata</i>	B
<i>Tanacetum bipinnatum</i>	B
Species Extirpated from Lake Merced	Locally Significant Rating (2015)
<i>Agrostis exarata</i>	A2
<i>Astragalus nuttallii</i> var. <i>nuttallii</i>	A1
<i>Astragalus nuttallii</i> var. <i>virgatus</i>	A1
<i>Athyrium filix-femina</i> var. <i>cyclosporum</i>	B
<i>Athysanus pusillus</i>	A2

2022.04.11 CNPS YB comments on Lake Merced Westside EIR

<i>Azolla filiculoides</i>	A2
<i>Baccharis glutinosa</i>	C
<i>Barbarea orthoceras</i>	B
<i>Bidens cernua</i>	A1
<i>Bowlesia incana</i>	A2
<i>Camissonia contorta</i>	A2
<i>Camissonia strigulosa</i>	B
<i>Camissoniopsis hirtella</i>	Listing warranted
<i>Camissoniopsis micrantha</i>	B
<i>Carex aquatilis</i>	A2
<i>Carex barbarae</i>	B
<i>Carex brevicaulis</i>	C
<i>Castilleja affinis</i> ssp. <i>affinis</i>	B
<i>Castilleja densiflora</i>	A2
<i>Castilleja exserta</i> ssp. <i>exserta</i>	A2
<i>Castilleja exserta</i> ssp. <i>latifolia</i>	A1
<i>Castilleja latifolia</i>	A2
<i>Caulanthus lasiophyllus</i>	A2
<i>Ceanothus incanus</i>	A2
<i>Centromadia pungens</i> ssp. <i>pungens</i>	Listing warranted
<i>Cerastium demersum</i>	A2
<i>Chenopodium berlandieri</i> var. <i>zchackei</i>	A1
<i>Chenopodium californicum</i>	C
<i>Cirsium andrewsii</i>	A1
<i>Cirsium brevistylum</i>	B
<i>Cirsium occidentale</i> var. <i>venustum</i>	Listing warranted
<i>Clarkia amoena</i> ssp. <i>amoena</i>	A2
<i>Clarkia davyii</i>	A1
<i>Clarkia purpurea</i> ssp. <i>quadrivulnera</i>	A2
<i>Clarkia purpurea</i> ssp. <i>viminea</i>	Listing warranted
<i>Claytonia perfoliata</i> ssp. <i>mexicana</i>	Listing warranted
<i>Collinsia barsiifolia</i> var. <i>hirsuta</i>	A1
<i>Collinsia corymbosa</i>	A1
<i>Collinsia heterophylla</i> var. <i>heterophylla</i>	A2
<i>Collinsia tinctoria</i>	A1
<i>Collomia heterophylla</i>	Listing warranted
<i>Corethrogyne filaginifolia</i>	A2
<i>Cornus sericea</i> ssp. <i>occidentalis</i>	Listing warranted
<i>Crassula aquatica</i>	A2
<i>Croton californicus</i>	A2
<i>Croton setiger</i>	A2
<i>Cryptantha clevelandii</i>	A2
<i>Cryptantha leiocarpa</i>	B
<i>Cuscuta occidentalis</i>	Listing warranted
<i>Cyperus niger</i>	A2
<i>Delphinium decorum</i> ssp. <i>decorum</i>	A1

2022.04.11 CNPS YB comments on Lake Merced Westside EIR

<i>Dichondra donelliana</i>	C
<i>Dipterostemon capitatus</i> ssp. <i>capitatus</i>	A2
<i>Eleocharis bella</i>	Listing warranted
<i>Eleocharis palustris</i>	Listing warranted
<i>Eleocharis radicans</i>	A2
<i>Elodea canadensis</i>	A2
<i>Elymus pacificus</i>	A2
<i>Elymus x gouldii</i>	Listing warranted
<i>Equisetum arvense</i>	A2
<i>Equisetum telmateia</i> ssp. <i>braunii</i>	C
<i>Equisetum xferrissii</i>	Listing warranted
<i>Erigeron foliosus</i>	C
<i>Erythranthe grandis</i>	Listing warranted
<i>Gamochaeta ustulata</i>	A2
<i>Helenium puberulum</i>	C
<i>Hesperocnide tenella</i>	B
<i>Hesperomecon linearis</i>	A2
<i>Heuchera micrantha</i>	B
<i>Horkelia cuneata</i> var. <i>sericea</i>	A1
<i>Hydrocotyle ranunculoides</i>	A2
<i>Hypericum anagalloides</i>	A2
<i>Isolepis cernua</i>	B
<i>Koeleria macrantha</i>	C
<i>Lasthenia californica</i> ssp. <i>californica</i>	A2
<i>Lasthenia gracilis</i>	Listing warranted
<i>Lasthenia minor</i>	A2
<i>Lathyrus vestitus</i> var. <i>ochropetalus</i>	A2
<i>Layia platyglossa</i>	B
<i>Lemna minor</i>	A2
<i>Lemna minuta</i>	A2
<i>Lemna valdiviana</i>	A2
<i>Leptosiphon croceus</i>	A1
<i>Leptosiphon latisectus</i>	Listing warranted
<i>Leptosiphon parviflorus</i>	Listing warranted
<i>Lessingia germanorum</i>	A1
<i>Lithophragma affine</i>	A2
<i>Logfia filaginoides</i>	A2
<i>Ludwigia peploides</i>	A2
<i>Lupinus polyphyllus</i> var. <i>grandifolius</i>	Listing warranted
<i>Luzula subselis</i>	Listing warranted
<i>Madia gracilis</i>	A2
<i>Melica imperfecta</i>	C
<i>Microseris bigelovii</i>	B
<i>Minuartia californica</i>	A2
<i>Monardella sinuata</i> ssp. <i>nigrescens</i>	A1
<i>Mondardella undulata</i>	A1

2022.04.11 CNPS YB comments on Lake Merced Westside EIR

<i>Monardella villosa (ssp franciscana)</i>	B
<i>Muilla maritima</i>	A2
<i>Myriophyllum sibericum</i>	A1
<i>Nemophila menziesii</i> vars.	B
<i>Oenothera elata ssp. hirsutissima</i>	Listing warranted
<i>Oxalis pilosa</i>	B
<i>Pectocarya penicillata</i>	A2
<i>Persicaria lapathifolia</i>	B
<i>Phacelia ciliata</i>	A2
<i>Phacelia douglasii</i>	A1
<i>Phacelia nemoralis</i> var. <i>nemoralis</i>	A2
<i>Plagiobothrys chorisianus</i> var.	A1
<i>Plagiobothrys stipitatus</i>	Listing warranted
<i>Plantago subnuda</i>	B
<i>Platystemon californicus</i>	Listing warranted
<i>Plectritis congesta ssp. brachystemon</i>	A2
<i>Poa secunda ssp. secunda</i>	C
<i>Potamogeton illinoensis</i>	Listing warranted
<i>Potentilla rivalis</i>	A2
<i>Pseudognaphalium microcephalum</i>	A2
<i>Pterostegia drymarioides</i>	B
<i>Rafinesquia californica</i>	A2
<i>Ranunculus aquatilis</i> var. <i>diffusus</i>	A2
<i>Rhododendron occidentale</i>	Listing warranted
<i>Rorippa curvisiliqua</i>	A2
<i>Rumex californicus</i>	Listing warranted
<i>Rumex fueginus</i>	A2
<i>Salix exigua</i> var. <i>hindsiana</i>	A2
<i>Salix scouleriana</i>	A1
<i>Senecio aronicoides</i>	A2
<i>Sidalcea malviflora ssp. malviflora</i>	B
<i>Silene verecunda</i>	A1
<i>Sisyrinchium californicum</i>	A2
<i>Sparganium eurycarpum</i> var. <i>greenii</i>	A2
<i>Spergularia macrotheca</i> var. <i>macrotheca</i>	B
<i>Spirodela polyrhiza</i>	Listing warranted
<i>Stachys bullata</i>	A2
<i>Stachys chamissonis</i>	A2
<i>Stephanomeria virgata ssp. pleurocarorpa</i>	A1
<i>Stuckenia pectinata</i>	Listing warranted
<i>Symphiotrichum subspicatum</i>	A2
<i>Thysanocarpus curvipes</i>	A2
<i>Thysanocarpus laciniatus</i>	A2
<i>Trifolium macrei</i>	B
<i>Trifolium microcephalum</i>	A2
<i>Trifolium microdon</i>	A2

2022.04.11 CNPS YB comments on Lake Merced Westside EIR

<i>Triglochin scilloides</i>	A2
<i>Trillium chloropetalum</i>	A2
<i>Triodanis biflora</i>	A2
<i>Triphysaria eriantha</i> ssp. <i>eriantha</i>	B
<i>Triphysaria eriantha</i> ssp. <i>rosea</i>	A2
<i>Triphysaria floribunda</i>	A1
<i>Triteleia hyacinthina</i>	A2
<i>Urtica dioica</i> ssp. <i>gracilis</i>	A2
<i>Veronica serpyllifolia</i> ssp. <i>humifusa</i>	A2
<i>Viola pedunculata</i>	A2
<i>Woffiella lingulata</i>	A2
<i>Yabea microcarpa</i>	Listing warranted
<i>Zannichellia palustris</i>	Listing warranted

*impacts to species rated A1 and A2 must be evaluated pursuant to the guidelines of CEQA;
It is not mandated that impacts to species rated B and C be evaluated.

Whitney Grover
On behalf of Golden Gate Audubon Society
2530 San Pablo Avenue, Suite G
Berkeley, CA 94702



*inspiring people to protect
Bay Area birds since 1917*

Julie Moore, Lake Merced West EIR Coordinator

San Francisco Planning Department
49 South Van Ness Ave, Suite 1400
San Francisco, CA 94103
CPC.LakeMercedWestEIR@sfgov.org

April 11, 2022

RE: Lake Merced West Project Draft Environmental Impact Report (San Francisco Planning Case No. **2019-014146ENV**)

Dear Ms. Moore,

Thank you for the opportunity to comment on the draft EIR for the Lake Merced West Project, the former site of the Pacific Rod and Gun Club. I am writing on behalf of the Golden Gate Audubon Society (GGAS) San Francisco Conservation Committee. GGAS is a non-profit organization dedicated to protecting Bay Area birds, other wildlife, and their natural habitats. We represent thousands of members and supporters in the San Francisco Bay Area. Many of our members regularly visit and enjoy Lake Merced and we know it to be an important bird habitat in the city.

In reviewing the draft EIR, GGAS was surprised to read on Page 30 as part of the “Summary of Impacts and Mitigation Measures” under Impact BI-2 that “Construction and operation of the project would not have a substantial adverse effect on special status birds” and that “no mitigation is required”.

Additionally, the “Summary of Impacts and Mitigation Measures” under Impact BI-5 on page 32 of the draft EIR further states that “Construction and operation of the project would not have a substantial adverse effect on nesting bird wildlife nursery sites or result in an increase in bird collisions with project features” and that “no mitigation is required”.

A Biological Resources Assessment of the Lake Merced West Recreation Project conducted by Coast Ridge Ecology dated July 2020 and summarized on Page 652 of the draft EIR was based on a project site survey for biological resources by Coast Ridge Ecology biologists. The site survey was conducted during several visits in December 2019. Among the twelve animal species with special status that were considered in their assessment for their potential to occur on the project site are six species which are listed by the California Department of Fish & Wildlife as “Bird Species of Special Concern”: Bank Swallow, California Black Rail, Northern Harrier, Saltmarsh Common Yellowthroat, White-tailed Kite and Yellow Rail. Of those, three

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BI-4

were evaluated as having “moderate” potential to occur on site and one species, the Saltmarsh Common Yellowthroat, was observed by the surveyors. The assessment further notes on Page 654 that “Extensive foraging and nesting habitat for bird species protected under the Migratory Bird Treaty Act (MBTA) can be found on site. It is likely that several passerine and raptor species may nest within the project site.” Additionally, on page 663, the assessment notes that “Biological value for wildlife within the project is extensive. The site harbors high quality native riparian and upland vegetation communities, relatively free of non-native and invasive species, which are valuable habitat for birds and small mammals that thrive among an environment dominated by native vegetation.”

Of the four California bird species of special concern that were noted in the Assessment of July 2020 as having at least moderate “potential to occur” on the project site, Golden Gate Audubon would like to focus attention particularly on the Saltmarsh Common Yellowthroat, which has been observed nesting at Lake Merced and which was present during the survey of December 2019. This species is in steep decline.

During a visit to the Lake Merced West site on March 22, 2022, San Francisco eBird reviewer, Dominik Mosur, observed and recorded Saltmarsh Common Yellowthroats displaying “possible” to “confirmed” breeding behavior. I personally have observed male Common Yellowthroats singing at this location, indicating territorial displays and possible nesting. According to Mr. Mosur, one of San Francisco’s top experts on local birds, and one of the most frequent visitors to Lake Merced and specifically, the Lake Merced West site, this site represents about 25% of this subspecies’ nesting habitat at Lake Merced.

The Biological Resources Assessment’s recommendations on page 677 of the draft EIR with respect to nesting birds are as follows:

“If the project begins construction within the nesting bird season (February 1 – August 31), it is recommended that a survey for nesting birds (including raptors and salt marsh common yellowthroat) is conducted within the project site and a 200-foot buffer around project boundary. The survey should be conducted within one week prior to any ground disturbance, vegetation or structure removal associated with the project to minimize impacts to these species. If active bird nests are detected, suitable no-work buffer zones may need to be established to ensure nesting birds are not impacted.”

GGAS wonders how, given the findings of the Biological Resources Assessment, the draft EIR can conclude that “Construction and operation of the project would not have a substantial adverse effect on special status birds” and that “no mitigation is required”. Clearly, Saltmarsh Common Yellowthroat and the three other bird species of Special Concern, Bank Swallow (regularly reported on eBird reports at Lake Merced and specifically Lake Merced West); Northern Harrier; and White-tailed Kite (most recently recorded via eBird at Lake Merced West on 10/30/2021) should be afforded the same consideration and mitigation as the Western Pond Turtle and bat species. These two species have significant mitigation measures listed in the draft EIR, yet no similar measures are indicated for bird species of special concern. We believe this to be an oversight.

1 CONT.
BI-4

Bird populations in North America have declined by nearly 3 billion since 1970. One of the major contributing causes is habitat loss and human disturbance. We urge you to consider the environmental impacts on birds in this important habitat consisting of over 11 acres that comprise the watershed's largest area of flat land outside of Harding Park, to make sure protection of birds is given top priority in the Lake Merced West Project development plans.

The Biological Resources Assessment further concludes on page 671 of the draft EIR: "In addition to the special-status bird species described above, extensive foraging and nesting habitat for a variety of bird species protected under the MBTA can be found on site within the native habitats of coast live oak woodland, tufted hairgrass meadow, and arroyo willow thicket. Common species observed on site that may nest within the project site or immediate vicinity include marsh wren, red-shouldered hawk, red-tailed hawk, black phoebe, and Anna's hummingbird (*Calypte anna*)."

Per GGAS's (Golden Gate Audubon Society) comments on the scope of the environmental review in the EIR planned for the project at Lake Merced West, dated July 8th, 2021, 277 species of birds have been observed at Lake Merced, the **highest number for any location** in San Francisco, according to eBird data. In addition to its importance to migrating birds foraging and passing through, Lake Merced is an important breeding area for a number of bird species in addition to those of special concern.

Specifically, eBird data list 118 species recorded at the site of the former Pacific Rod and Gun Club, the location of the proposed West Lake Merced project. As recently as March 22, six species were noted by San Francisco eBird reviewer, Dominik Mosur, as displaying "possible" to "confirmed" breeding behavior. White-tailed Kite, another species of Special Concern was reported on 10/30/2021. Bank Swallows also appear frequently on eBird reports from Lake Merced. Clearly, more study by trained ornithologists at the site of the proposed project is needed to minimize and mitigate any harmful effects of construction and operation of the project on species of special concern and bird species in general. The ornithological surveys should be conducted during the overwintering, spring and fall migration and summer breeding seasons to ensure that data on all bird species that depend on this habitat are fully analyzed.

We sincerely hope that you will take the concerns mentioned in this letter into consideration and include mitigation for the birds that utilize the prime habitat located at the Lake Merced West Project site for nesting and foraging. We thank you for your attention and consideration and look forward to answering any questions you may have.

With best regards,



Whitney Grover,
Chair, San Francisco Conservation Committee, Golden Gate Audubon Society
Board Member, Golden Gate Audubon Society

^{1*} *Shuford, W. D., and Gardali, T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento. California*

From: [D and M Morten](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [Dick Allen](#); [Dick Morten](#)
Subject: Add larger boathouse
Date: Saturday, March 5, 2022 7:06:09 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Julie. Who can add the rowing communities larger boathouse proposal to EIR evaluation? Rec Park who has heard numerous times about the proposal? Supervisor Melgar?

Note Dick Allen’s remarks below.

Thank you for response.

Dick Morten

Sent from my iPhone

Begin forwarded message:

From: "Richard B. Allen" <richardballen35@gmail.com>
Date: March 5, 2022 at 4:02:54 PM PST
To: Morten <msarawak@yahoo.com>
Cc: "Suen, Jackie (REC)" <jackie.suen@sfgov.org>, "MelgarStaff (BOS)" <melgarstaff@sfgov.org>, Peder Jones <pederj@earthlink.net>, Frank Noto <Frank@fnstrategy.com>
Subject: Dick, I did my best and lost.

6-23-2021

Lake Merced EIR call-in meeting. Time, 1 minute and 22 seconds.

My name is Dick Allen, District 7, member of the Dolphin Club at Lake Merced. I have rowed on the lake for over 15 years and I was a founding member of the

Lake Merced Merced Task Force and co-chair of the water committee.

I strongly recommend that Rec & Park amend their EIR to include a new boathouse located on the site that is currently being proposed for a tree trimming facility.

Rec & Park’s current proposal for this building on a waterfront site is a terrible mistake.



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PD-2

The proposed site for a tree trimming facility is a perfect **location for a new larger boathouse for water recreation** that will provide easy and safe access to the water.

Rec & Park needs to amend their EIR that would conform to the **2010 Watershed Report**, a well-thought plan that took several years to prepare and cost \$588,000. This report was paid for by the San Francisco Public Utilities Commission, the Lake Merced landlord, and they made this report a gift to their tenant, the San Francisco Rec and Park Department.

I look forward to a revised EIR

1 CONT.
PD-2

April 6, 2022

Dear Julie Moore,

I am writing to support the messages you have been receiving from other rowers regarding the SFRPD's plans about the Lake Merced West site.

I am part of the masters rowing community at Lake Merced and am a board member of the San Francisco Rowing Club (SFRC). SFRC is a club of approximately 45 people whose members row daily on Lake Merced. Masters rowers at Lake Merced include SFRC, members of the Dolphin Swimming and Rowing Club, and members of the Pacific Rowing Center masters group. Please note the rowing community at Lake Merced spans many age groups from young school-age novice rowers to elderly masters rowers. Among us are former National Team members and Olympic rowers.

My concerns include:

1. The proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams or rowing clubs, the resident user experts.
2. Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site.
3. Please save taxpayer money and everyone's time by having the right plans in place the first time through. It is essential to make this happen before the Planning Department moves forward with creating the draft EIR.
4. A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just cannot support.

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GC-1

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PD-2

Please seriously consider and respect the legacy rowing has at Lake Merced, and the greater good it holds for the community. Thank you in advance for your consideration.

Sincerely,

Brenda A. Austin, Ph.D.

From: [Aviva](#)
To: [CPC.LakeMercedWestEIR](#); [MelgarStaff \(BOS\)](#)
Subject: ATTN Julie Moore
Date: Monday, April 11, 2022 2:28:33 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site. It has been an extremely empowering community to foster positive sportsmanship and empowerment.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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Thank you for your time and your consideration.

Aviva

From: [Maisy Ballantyne](#)
To: [MelgarStaff \(BOS\)](#); [CPC.LakeMercedWestEIR](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Monday, April 11, 2022 2:13:46 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am a current high school rower at Pacific Rowing Club, at Lake Merced, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

I've been a part of PRC for close to three years now. Joining the rowing community has been the best decision of my life. I think I speak for all of my teammates when I say that Lake Merced is truly our second home. It's such a privilege to have a supportive and hardworking community to go to every day. My team is a diverse group of young people from all over the city, and rowing is something that connects us all.

We would love to be able to provide for as many young people and adults as possible, but at the moment, our current facility at 1 Harding Road limits our ability to do so. SFRPD's proposed plans for the SE portion of the Lake Merced West site, are inadequate and ignore the major activity at the lake - rowing. As Lake Merced is the largest lake in the city of San Francisco, it is so important for these plans to be site-specific, and cater to the activities on the water.

Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

Thank you for your time,

Maisy Ballantyne

Pacific Rowing Club

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PD-2

From: [Sedi-Anne Blachford](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR
Date: Monday, April 11, 2022 9:26:51 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

My name is Sedi Blachford, I'm a senior in high school and I've been rowing with Pacific Rowing Club since 7th grade. I was hoping to add my voice to the discussion around the Lake Merced West EIR and proposed recreation facility. Rowing has been an extremely important aspect of my life throughout my years of participation, and I can say without a doubt that being able to row with Pacific Rowing Club has made me a better student, athlete, and community member. Having better facilities for both PRC and SI would only augment that effect for other athletes.

I've looked through the proposed plans on the public scoping meeting presentation, and I'd like to echo the suggestions of both PRC and SI.

Rowing is one of the primary uses of the lake, and the amount of space designated for the new boathouse doesn't reflect the importance of the rowing community to Lake Merced. Having more dock space for launching could make the lake more inviting to non-rowing water sports such as stand-up paddle boards or kayaking, as there wouldn't be as much competition for launching space.

There is one other point I wanted to mention, which could already be part of the proposed plan but I couldn't tell from any of the drawings or writing on the suggested project. It is absolutely necessary that there are restrooms available at the new boathouse, not just on the west side of the site.

To end with some of the language written by PRC and SI:

Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

Again, I can't emphasize enough the importance that rowing has had on my adolescence, and I'm certain any other young rower would say the same. The boathouse provides a special community that can use your support to grow bigger and better.

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PD-2

Thank you for your time,
Sedi Blachford

From: [Robert Blazej](#)
To: [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#)
Cc: [MelgarStaff \(BOS\)](#); [Fieber, Jennifer \(BOS\)](#)
Subject: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community's Needs
Date: Wednesday, April 6, 2022 7:24:31 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore and associated Commissioners and Staff,

Below is a form letter from St. Ignatius and Pacific Rowing Club which I fully support. I just wanted to add personally that rowing was a vital part of my youth, teaching me teamwork and perseverance that has guided me throughout my life.

A native San Franciscan, I rowed for Pacific Rowing Club while at Lowell. I went on to row for Cal as an undergraduate and then returned to Cal and UCSF for my graduate studies. Afterward, I created a biotech company in San Francisco. None of that journey was easy for me and I honestly would not have made it if not for the lessons I learned rowing in San Francisco.

Getting out on the glassy morning water and pushing to your limits is a magical and guiding experience I hope more San Franciscans can experience.

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

SFRPD's proposed plans for the SE portion of the Lake Merced West site remain inadequate and don't reflect the known needs of the rowing community. The plans assessed in the EIR need to include a major boathouse with at least 14,000 sq/ft of boat storage space. Please replace the highly insufficient plans being used by the EIR with one that incorporates SI's and PRC's jointly-created vision for the SE portion of the site.

Rowing for All: The space is essential for the community's joint vision of supporting far more than the current 400+ youth and adults, one that provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. A cornerstone of this effort is increasing access and engagement for people of color and traditionally-underrepresented youth and adults.

The envisioned rowing center would provide for the most diverse range of San Franciscans. More adults and youth, of all abilities and backgrounds. The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport develops and strengthens the mind and body of all who want to row. It provides considerable pathways for advancement towards college, and for a healthy and fulfilling life beyond.

The entirety of the SE portion of Lake Merced West beyond the southern buildings should be

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committed to rowing-related facilities and operations, and not include arborist facilities. A boathouse depends on access to water, whereas an arborist facility does not. Include rowing professionals and rowing community leaders in the planning process for the rowing center area, and let them lead or direct the layout and design of the boathouse and related facilities. Specifically involve PRC and SI, as they developed all of this for the first round in 2015 and 2016 and their combined communities are uniquely positioned to be essential assets in this effort.

Best regards,
Robert Blazej

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CONT
PD-2

From: [Patricia](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#); [Bob Blee](#)
Subject: Lake Merced Request for Replacement of Current Boathouse Plans Reflecting Community Needs
Date: Monday, April 11, 2022 3:38:42 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Moore,

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

1 - The plans in the Draft EIR continue to include a highly insufficient watercraft facility that falls short of the known needs and vision of the community. Existing and foreseeable future recreational demand is not adequately provided for, at the current boathouse at 1 Harding Rd or through the plans in the EIR, and the EIR's proposed plans would *not* add suitable water-oriented recreational facilities to the lake.

2 - Please replace the plans being used by the EIR with ones that incorporate the rowing community's jointly-created vision for the southeast portion of the site. Have the much larger facility be the primary plan in the EIR, not a discarded alternative. Include rowing leaders - those who know the sport - in the planning process.

3 - A new, much larger boathouse will make a difference in the lives of thousands of adults and young people of all backgrounds and abilities every year. The current boathouse at 1 Harding Road already cannot adequately serve the 400+ youth and adult rowers at the lake.

4 - The desperately-needed facility is essential for the community's joint vision of rowing at Lake Merced, one that not only expands youth rowing opportunities, but provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. It will be a true community center, one that provides a welcoming and engaging atmosphere for people of color and those who are traditionally underrepresented in the sport.

5 - The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport can develop and strengthen the mind and body of all who want to participate. It provides considerable pathways for advancement towards college if desired, and for a healthy and fulfilling life.

Help the rowing community change lives, and please recognize the legacy, vision, and expertise that the teams bring to the table.

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PD-2

Thank you for your time,

Patricia Blee

From: [Boushey, Homer A](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#); [MelgarStaff \(BOS\)](#); [Fieber, Jennifer \(BOS\)](#); [snelsen@siprep.org](#)
Subject: Need for updated Lake Merced Boathouse and Rowing Center. "The Boys (and Girls) in the Boat"
Date: Tuesday, April 5, 2022 12:16:05 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore and associated Commissioners and Staff,

Our grandson is a 7th-generation San Franciscan who took part in a youth program of the Pacific Rowing Club and is now on the Crew team of St. Ignatius high school. That means we have had the chance to watch Crew meets at Lake Merced and also at other facilities, like Oakland and Redwood City. Our experience has led us to implore you to pay attention to the messages you've been receiving regarding the Lake Merced West site.

In essence, the City has the opportunity to transform a recreational site from a dingy, outmoded one into a major attraction and resource, as it did in remodeling the tennis courts at Golden Gate Park into the world-class Goldman tennis center. We should now do the same for Crew, a wonderfully healthy sport that was once, like tennis, a hobby of the well-off, but that is now open to people from all levels of society and eager to embrace them. The interest in rowing will explode when George Clooney's film, "The Boys in the Boat" is released. The Pacific Rowing Club, St. Ignatius High School, and the rowing community of our city will be ready and eager to welcome those from all walks of life who are inspired to take up rowing

The West Coast Scholastic Championships for Crew will be held at Lake Merced on April 24, a rare opportunity, for the facilities are so much better in SoCal. Please come to see the event at Lake Merced. You'll see why Crew is such a wonderful sport for boys and girls, men and women. You'll also see how inadequate the current facilities are.

Taking advantage of this opportunity to upgrade the facilities at Lake Merced would put San Francisco on the map for an internationally growing sport. So while we thank you for the work you've done for the Draft EIR, please reconsider. Please don't let this chance slide by.

Yours sincerely,

Homer and Virginia Boushey
 35 El Verano Way, San Francisco 93127

Thank you for all the work you've done for the Draft EIR thus far.

1. SFRPD's proposed plans for the SE portion of the Lake Merced West site remain inadequate and don't reflect the known needs of the rowing community. The plans

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 PD-2

- assessed in the EIR need to include a major boathouse with at least 14,000 sq/ft of boat storage space. Please replace the highly insufficient plans being used by the EIR with one that incorporates SI's and PRC's jointly-created vision for the SE portion of the site.
2. Rowing for All: The space is essential for the community's joint vision of supporting far more than the current 400+ youth and adults, one that provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. A *cornerstone* of this effort is increasing access and engagement for people of color and traditionally-underrepresented youth and adults.
 3. The envisioned rowing center would provide for the most diverse range of San Franciscans. More adults and youth, of all abilities and backgrounds. The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport develops and strengthens the mind and body of all who want to row. It provides considerable pathways for advancement towards college, and for a healthy and fulfilling life beyond.
 4. The entirety of the SE portion of Lake Merced West beyond the southern buildings should be committed to rowing-related facilities and operations, and not include arborist facilities. A boathouse depends on access to water, whereas an arborist facility does not.
 5. Include rowing professionals and rowing community leaders in the planning process for the rowing center area, and let them lead or direct the layout and design of the boathouse and related facilities. Specifically involve PRC and SI, as they developed all of this for the first round in 2015 and 2016 and their combined communities are uniquely positioned to be essential assets in this effort.

1 CONT.
PD-2

Thank you for your time,

From: [Kate Boyd](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Lake Merced West Project Comment
Date: Monday, April 11, 2022 4:00:05 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I am part of the masters rowing community at Lake Merced and a member of the San Francisco Rowing Club (SFRC). SFRC is a club of approximately 45 people whose members row daily on Lake Merced. Adult rowers at Lake Merced include SFRC, members of the Dolphin Swimming and Rowing Club, and members of the Pacific Rowing Club masters group.

The youth rowing programs at Lake Merced serve several hundred middle and high schoolers. These programs have been a life-saver to families during the pandemic and are thriving.

My concerns include:

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site ignore the major activity at the lake - rowing.

On mornings and after school the lake is filled with large, fast moving rowing boats and coaches' motorized launches. The parking lot is full of parents dropping off and picking up their children.

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate the existing rowing club's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with finalizing the draft EIR.

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the Lake, or the greater good it can do.

--

Kate Boyd (she/ her/ hers)

1
PD-2

From: [Gail Brownell](#)
To: [CPC.LakeMercedWestEIR](#); [Moore, Julie \(CPC\)](#)
Cc: [Gail Brownell](#)
Subject: Comments Lake Merced West Project San Francisco Planning Case No. 2019-014146ENV
Date: Monday, March 28, 2022 12:45:18 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello Julie,

Below are comments for the project. The main point is that there seems to be a neglect of recognition of the largest existing user of Lake Merced - rowing clubs. The word rowing is not even in the list of activities at the lake in the summary of the project. Please at least add that.

1
PD-2

Since this is an environmental impact report, some positive impacts related to rowing that could be included:

- a new boathouse would reduce raccoon temptation, and population hopefully
- new docks could allow for solar powered instead of gas powered launches for coaches, reducing gas engine noise and impact on lake
- new boathouse and parking might reduce traffic impact of regattas?

Here are more detailed comments on reviewing the EIR:

FEB 23 2022 Draft EIR Lake Merced West Proje 520 John Muir Drive
COMMENTS

S.3.1. Project Location and Proposed Facilities

Add to the second paragraph in the listing of activities: rowing.

Why? One of the major uses of the lake is the FOUR rowing clubs that row out of the boathouse on the Lake. On a daily basis 100 to 200 high school and adult rowers use the lake. The current boathouse is undersized and in need of upgrade.

Check out this history article: <https://tonyhallsf.wordpress.com/2010/04/07/the-duel-at-the-boathouse-at-lake-merced/>

2
PD-2

And a recent article in Chronicle about a high school regatta with many rowers coming to Lake Merced from elsewhere

<https://www.sfchronicle.com/bayarea/article/Photos-capture-young-rowers-sculling-on-Lake-16997599.php>

Figure S-3

COMMENTS

Adjust the size of the boathouse to make it realistic for rowing shells. 8 person rowing shells are over 60 feet long. Storing an maneuvering requires specific design.

Adjust the size of the dock and add another dock for effective rowing shell launching and retrieval. When all four clubs are rowing much more dock length is needed as the various teams launch and return. (each club has several - novice intermediate varsity)

Parking - allow one large parking area for trailers that carry the long rowing shells. Trailers are long in order to carry the 60 foot long shells.

2
CONT
PD-2

SUMMARY OF IMPACTS AND MITIGATION MEASURES
Hydrology and Water Quality section

Impact C-HY-1 "impacts on hydrology and water quality"
COMMENT

3
HY-1

This project can POSITIVELY impact the water quality by allowing rowing clubs to change the motos on the coaching motor boats from gas to electric. Installing a boathouse and boat dock that has electric power (and solar panels on roof ideally) would make this possible. Lake Merced is not well "flushed" and has water quality issues. Gasoline engines add pollutants to the Lake. Electric engines would not.

Table 1-1
Scoping of Public Comments

COMMENT SUPPORT yes include Rowing Community
"Boathouse/Rowing Facility. Recommends that the EIR include an expanded boathouse/rowing facility or area for aquatic activities and boat storage as part of the project or as an alternative to the project. Recommends rowing community be included in project development. "

2.4 Project Characteristics page 2-6

Include rowing in the list of activities, since rowing brings 100-200 people daily to the Lake.

BOATHOUSE Page 2-7

4
PD-2

NO mention of rowing!!!! the major current water activity on the Lake.
Include rowing and involve rowing community in design. There should be two docks the docks should be longer or designed with two launching side pieces.

ARBORIST OFFICE AND YARD

Add parking space in the arborist yard for the large rowing trailers needed by rowing clubs. Compatible use - large items.

WATER RECREATION page 2-12

Work with the rowing community on dock design. A KEY point is that the dock for rowing shells needs to be very low to the water. Standard docks that work for other boats will not work for rowing shells.

2.7 PROJECT OPERATION
2.7.1 Recreational Facility Operation

5
PD-2

"Regular hours" for rowing boathouses : Rowers have to practice before an after school so early morning is important. Rowers are there before sunrise, often 5am until 8 am and late

afternoon are the busiest times. That is why most people do not realize how many rowers use the Lake now, most people are not up and awake when rowers are practicing.

5
CONT
PD-2

5.6.3 LARGER BOATHOUSE page 5-30

"5.6.3 Larger Boathouse

In response to the NOP, commenters recommended that the city include a larger boathouse as part of the project. The planning department, RPD, and SFPUC considered an alternative site layout that would have included a larger boathouse at the southeastern end of the site. However, because a larger boathouse would not have avoided or substantially lessened the significant effects of the project compared with other partial or full preservation alternatives, it was not selected for detailed evaluation as a CEQA alternative. "

6
PD-2

So... this is the way the rowing community is put off...

Is there an opportunity for the rowing clubs to be involved in the design process to assure that whatever design is proposed will actually work?

I understand that a group of rowers has provided input and designs in the past to SF Park and Rec. What happened with that input?

7
GC-1

--

Gail Brownell
mobile 408.218.3913
gailbrownell@gmail.com

From: [Andrea Caliandro](#)
To: [CPC.LakeMercedWestEIR](#); [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Monday, April 11, 2022 4:46:54 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

1
GC-1
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PD-2

Thank you for your time,
Andrea Caliandro

From: [Christina Callahan](#)
To: [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#); [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#); [Jack Callahan "23"](#); [peter callahan](#)
Subject: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community's Needs
Date: Monday, April 11, 2022 8:42:40 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

We are a part of the rowing community at Lake Merced, through St. Ignatius, and we want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

1 - The plans in the Draft EIR continue to include a highly insufficient watercraft facility that falls short of the known needs and vision of the community. Existing and foreseeable future recreational demand is not adequately provided for, at the current boathouse at 1 Harding Rd or through the plans in the EIR, and the EIR's proposed plans would *not* add suitable water-oriented recreational facilities to the lake.

2 - Please replace the plans being used by the EIR with ones that incorporate the rowing community's jointly-created vision for the southeast portion of the site. Have the much larger facility be the primary plan in the EIR, not a discarded alternative. Include rowing leaders - those who know the sport - in the planning process.

3 - A new, much larger boathouse will make a difference in the lives of thousands of adults and young people of all backgrounds and abilities every year. The current boathouse at 1 Harding Road already cannot adequately serve the 400+ youth and adult rowers at the lake.

4 - The desperately needed facility is essential for the community's joint vision of rowing at Lake Merced, one that not only expands youth rowing opportunities, but provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. It will be a true community center, one that provides a welcoming and engaging atmosphere for people of color and those who are traditionally underrepresented in the sport.

5 - The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport can develop and strengthen the mind and body of all who want to participate. It provides considerable pathways for advancement towards college if desired, and for a healthy and fulfilling life.

Help the rowing community change lives, and please recognize the legacy, vision, and expertise that the teams bring to the table.

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PD-2

Thank you for your time,
Christina and Peter Callahan
Jack Callahan

From: [Gavin Callies](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR Comment
Date: Sunday, April 10, 2022 11:40:46 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

My name is Gavin Callies and I'm writing on behalf of Pacific Rowing Club regarding the EIR for the Lake Merced West project which will take place on the site of the old Pacific Rod and Gun shotgun range. First, I would like to say I appreciate the planning department's vision and efforts to push for a full restoration and revitalization of the area. As a young child I spent many days at the shotgun range and have many fond memories of spending time with my family there enjoying skeet and trap shooting. If there was anyone particularly sad about seeing the shotgun range close, I was definitely on that list. That being said, I fully acknowledge that the range is never coming back, the buildings there beyond repair, and I believe the entire site should be cleared to make way for a new vision. For this, I am glad the planning department is pushing to have the old buildings removed and pay homage to the legacy of the range in a more nuanced manner.

Beyond that though, I can't say that I agree with most of the plans that have been drafted up for the EIR. Lake Merced is a unique resource in our city that could facilitate very specific activities, watersports, and I believe the EIR falls very short realizing this reality. Just looking over the objectives of the project, I feel that current plans aren't fully optimizing those wants. PRC fully aligns with the project objectives and would love to see all of them fulfilled. We just believe a different site plan would better achieve the objectives that have been laid out.

Our main ask is that a larger, multi use, aquatic center be incorporated into the plan. We understand that environmental impact would be slightly greater, but we believe the benefits to the community would be exponentially outweighed. PRC has a 42 year history of serving the youth of San Francisco and have been trying to expand our capacity to serve more people in recent years. We currently have about 200 youths on our roster between our middle school and high school programs and we have about 20 members in our newly formed adult program that started this past fall. Unfortunately we are pushing our limits on the amount of people we can serve as our current facility is too small to hold more equipment that would allow us to serve a greater portion of the community.

The current site plan has a restaurant, community center, and a very small boathouse, unusable by the rowers, as 3 separate buildings. I believe that if a large aquatic center were to be part of the plan instead of these three separate facilities, a larger and more diverse segment of San Franciscans could be served in a better manner. A large aquatic center that was 2-3 stories tall could integrate a community center, community work

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PD-2

out room, office space for aquatic center operations, restaurant, locker rooms, and more. I feel having this one large facility would free up more space on the rest of the lot for the open nature and picnic areas that would like to be seen on the site.

Rowing has had the most amazing impact on my life. I am the first person in my family to have graduated from a 4 year college and I can say without question rowing was the conduit for accomplishing that. I found rowing in high school and it provided the spring board I needed to get myself into my first choice of college. Once in college, while I sometimes struggled academically, being on the rowing team provided me the structure and support to continue with school and graduate on time. While I acknowledge the vast amounts of support I had from my family and others in my life, being a part of a crew team was the foundation that kept me motivated to finish college and achieve my dreams. I want to afford these same opportunities to the next generation, which is why I have returned to work in the sport that gave so much to me. We see many youths every year that we already help achieve their dreams, but a new, larger facility would help us support more youths in this one area, while simultaneously opening doors that could enhance this corner of San Francisco for everyone who wants to enjoy the lake, even if it's through another watersport that could be housed in the same facility.

Thank you for all your hard work and hearing our vision for what could be at Lake Merced to enhance the lives of as many people in our community as possible.

--

V/r,
Gavin Callies
Boathouse Manager- Pacific Rowing Club
650-291-2132
g.callies@pacificrowingclub.org
www.pacificrowingclub.org

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CONT
PD-2

From: [Eric Carman](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Monday, April 11, 2022 9:33:53 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club and Dolphin Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at [1 Harding Road](#) just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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GC-1

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PD-2

Thank you for your time,

Eric Carman

From: [Isabelle Carman](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#); [Emmie Koenig](#)
Subject: Lake Merced West Draft EIR
Date: Friday, April 8, 2022 11:51:05 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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GC-1
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PD-2

Thank you for your time,

Isabelle Carman
415-990-3155

From: [Chloe Rose](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Lake Merced West site plans
Date: Monday, April 11, 2022 10:09:12 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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GC-1
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PD-2

Thank you for your time,

Chloe Casement

From: [Jayne Chen](#)
To: [CPC.LakeMercedWestEIR](#); [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Monday, April 11, 2022 2:36:55 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

My daughter is part of the rowing community at Lake Merced, through Pacific Rowing Club. I want to echo the messages you've been receiving regarding the Lake Merced West site.

I really hope you take in the consideration of the rowing community that is embedded in the entire SF community from various schools, to the adult Master's program.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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GC-1

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PD-2

Thank you for your time,

Jayne

From: [Tami Cho](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: melgarstaff@sfov.org; [Adam Heller](#)
Subject: Lake Merced West site plans - ATTN: Ms. Julia Moore
Date: Monday, April 11, 2022 12:29:06 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Moore,

We are a part of the rowing community at Lake Merced through the Pacific Rowing Club. We would like to echo the messages you've been receiving regarding the Lake Merced West site.

We have lived in San Francisco for 20 years, and believe these Project Objectives proposed by the Pacific Rowing Club are invaluable to the community and will be life changing for so many.

Below are the few points we would like to bring to your attention:

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

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GC-1

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

2
PD-2

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please do not ignore the legacy the sport has at the lake, or the greater good it can do.

Thank you for your time.

Sincerely,

Tami Cho and Adam Heller

From: [eva chu](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Project EIR
Date: Sunday, April 10, 2022 3:11:45 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I reviewed the project EIR for Lake Merced at the former SF Gun Club. Activities proposed did not take into consideration the current rowing activities at the lake. I don't know if you know, but hundreds of people, from teenagers to seniors, row at the lake weekly. Rowing is the number one activity happening on the lake daily. It is the best sport for kids who don't make the basketball, football, soccer or baseball teams at school. These kids become elite athletes in this sport. The rowing programs at the lake are very successful in developing character, discipline, spirit of competition, camaraderie and all the good stuff you wish for your kids. And rowing should continue at the lake in the foreseeable future. Any future development at the lake should include the growth of rowing for the people of San Francisco. Thank you for your consideration of this great sport.

-eva Chu

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PD-2

From: [Patty Downey](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: ATTENTION Julie Moore (Lake Merced West)
Date: Monday, April 11, 2022 10:05:35 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Moore:

I am part of the rowing community at Lake Merced, as the parent of an athlete at Pacific Rowing Club and a student at St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) The SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and did not appropriately take into consideration the views of the SF rowing community, who are the biggest users and supporters of the lake. It would be tragic to miss this opportunity to maximize the potential of the site.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with a plan that incorporates PRC's and SI's jointly-created vision for the southeast portion of the site. We have heard repeatedly that the plans can be changed later, but experience has shown that is not the optimal approach. It would save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake and the greater good it can do for an even larger community of future rowers.

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GC-1

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PD-2

Thank you for your time,

Patty Downey
1745 20th St.
San Francisco, CA 94107

From: [k_eiger](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Thursday, April 7, 2022 11:53:58 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

Our family is part of the rowing community at Lake Merced, through Pacific Rowing Club. The club has been a blessing since the beginning of, and over the course of, the pandemic and we wholeheartedly wish to support its future at Lake Merced.

- We enthusiastically support the following messages you've been receiving regarding the Lake Merced West site from other rowing community members!!!

1) SFRPD's proposed plans for the southeast portion of the Lake Merced West site are inadequate and uninformed, and ignore this tremendously positive and collaborative activity at the lake - **rowing!** The SFRPD didn't consult with the rowing teams, who are clearly the resident experts, there every day of the week at all hours of the day.

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with plans that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place *the first time through*. Please make it happen before the Planning Department moves forward with creating the draft EIR.

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do. We know this from experience.

When so many venues for healthy, outdoor activity were closed over the past two years, rowing took center stage to keep our son physically fit, active with friends in a close community, and mentally engaged. The city is lucky to have such a positive community and every effort should be made to support it into the future.

Thank you for your time,
The Eigers

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GC-1
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PD-2

From: [james england](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: ATTENTION: JULIA MOORE
Date: Wednesday, March 30, 2022 12:20:22 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

My 14 year old daughter rows at Lake Merced with Pacific Rowing Club. The impact the club and the sport have had on her since she joined 2 years ago is incredible. I have seen the same effect on some of her friends. It is an amazing club and a big part of these kids' lives. Having seen this impact I think it would be great for San Francisco if they are able to expand the club. Given this, I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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GC-1
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PD-2

If you would like to hear more about the club and the impact it has had on my child please do let me know I'd be happy to talk or correspond via email.

Thank you for your time,

James England

From: [Doug Foster](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Monday, April 4, 2022 3:19:21 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) The rowing community is a steward of Lake Merced in my opinion and has contributed meaningfully to the lake's accessibility and use by San Franciscans. Working collaboratively with a community that uses Lake Merced so frequently, and that has invested so much of their time, is an important function of our municipal agencies. They have thought carefully about the plans for the EIR and my request is that these suggestions be included in the upcoming processes.
- 2) Please direct the SFRPD to replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please include the legacy the sport has at the lake, and the greater good it can do.

1
GC-1

2
PD-2

Thank you for your time,
Doug

From: [Gregoire Gabalda](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Monday, April 11, 2022 11:10:02 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am a San Francisco resident and Adam, my 15 years old son is part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

Thank you for your time,
Grégoire Gabalda
gregoire.gabalda@ubisoft.com

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GC-1

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PD-2

From: [EBEN GARNETT](#)
To: [CPC.LakeMercedWestEIR](#); [Moore, Julie \(CPC\)](#)
Cc: [EBEN GARNETT](#)
Subject: Lake Merced West Project Concerns
Date: Monday, April 11, 2022 2:47:23 PM
Attachments: [image.png](#)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

As a master's rower at SF Rowing Club and the parent of a middle-school rower at Pacific Rowing Club, I am concerned that the proposed “new boathouse” plans for the Lake Merced West site have not factored “Rowing” into the design. Rowing has been the primary activity on Lake Merced for decades. Youth rowing teams from Pacific Rowing Club and Saint Ignatius (both currently using the “old boathouse” at 1 Harding Road) have won multiple national championships in the past, and Lake Merced is the only location in the entire Bay Area that can host large regattas for high-school crews from San Francisco, Marin, the East Bay, and the Peninsula.

When I saw the proposed layout for the new boathouse that incorporates a small rental kiosk for kayaks and a small roundabout parking lot, it was clear that no rowers had been consulted in the design. The only analogy I could think of would be designing the Harding Park Golf Clubhouse without consulting a golfer! Rowing involves large numbers of participants and a wide range of boat sizes (from 60-ft long eight-person shells to 27-ft single-person sculls) with much larger space requirements than those envisioned in current plans. I have included some pictures and links from a recent rowing regatta on Lake Merced that drew thousands of athletes and spectators to give you a sense of the scale of rowing.

Pacific Invite Regatta – Lake Merced – March 12, 2022

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PD-2



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CONT.
PD-2

<https://www.sfchronicle.com/bayarea/article/Photos-capture-young-rowers-sculling-on-Lake-16997599.php>

[Pacific Invite Regatta - PM Photo Gallery](#)

[Pacific Invite Regatta - AM Photo Gallery](#)

As you can see from the photos and links above, the current "new boathouse" proposal would be inadequate to support either a large rowing regatta or the future needs of Lake Merced's existing, space-constrained rowing clubs as they seek to expand the accessibility of rowing to all age groups in our community.

Please replace the existing plans being used in the environmental review process with a new proposal that takes into account input from the existing rowing clubs on Lake Merced!

Sincerely,

Eben Garnett
223 Cherry St.
San Francisco, CA 94118
(415) 203-0188

From: [Marina Gelman](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: ATTENTION: Julia Moore
Date: Wednesday, March 30, 2022 9:59:49 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

As a parent of a PRC rower, Josh Zilberman, I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

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GC-1

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

2
PD-2

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake or the greater good it can do.

Thank you for your time,

Marina Gelman

248 26th Ave

San Francisco, CA 94121

From: Maddy Griffith <maddyg415@gmail.com>
Sent: Thursday, March 31, 2022 4:26 PM
To: CPC.LakeMercedWestEIR
Subject: Attn: Julie Moore

Dear Julie Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club. Being part of this club when I was in high school changed my life - the skills, motivation, challenge, and accountability that Pacific Rowing Club instilled in me has lasted. Coming back to the sport as an adult athlete it is inspiring to see all of the young people there and the dedication from them and all of the coaching staff. I know that this club has the power to positively impact many future groups of adolescents as well.

I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

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GC-1

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

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PD-2

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

Thank you,

Maddy Griffith (she/her)

madeline_griffith@[berkeley.edu](mailto:madeline_griffith@berkeley.edu)

MPH Student: Maternal, Child, and Adolescent Health
University of California, Berkeley

From: [Nina H](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Lake Merced West Project Comment
Date: Monday, April 11, 2022 2:26:43 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am writing to support the messages you have been receiving from other rowers regarding the SFRPD's plans about the Lake Merced West site.

I am a senior (aged) member of the masters rowing community at Lake Merced and a member of the San Francisco Rowing Club (SFRC). SFRC is a club of approximately 45 people whose members row daily on Lake Merced. Masters rowers at Lake Merced include SFRC, members of the Dolphin Swimming and Rowing Club, and members of the Pacific Rowing Club masters group. Please note the rowing community at Lake Merced spans many ethnicities and age groups from young school-age novice rowers to elderly masters rowers. Among us are former National Team members and Olympic rowers.

My concerns include:

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD did not consult with any of the rowing clubs currently using the "old" Boathouse at 1 Harding Road and any of the resident experts.

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GC-1

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate existing rowing club's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through.

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PD-2

Please make it happen before the Planning Department moves forward with finalizing the draft EIR.

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the Lake, or the greater good it can do.

Please seriously consider and respect the legacy rowing has at Lake Merced, and the greater good it holds for the community. Thank you in advance for your consideration.

Sincerely,

Nina Hagiwara

District 7

From: [Robert Hall](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Lake Merced DEIR comment
Date: Monday, April 11, 2022 11:17:18 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I'm really concerned that the Lake Merced West Draft EIR doesn't call for mitigation for the San Francisco Common Yellowthroat. This bird is in steep decline and relies on the native vegetation for foraging and nesting, particularly the grasses and sedges near the shoreline. Instead of destroying the habitat consider a full restoration of the shoreline habitat. Climate change is accelerating wildlife species decline. Development is a huge part of the problem. San Francisco needs to be responsible citizen of the planet.

Reference:

Habitat Requirements

San Francisco Yellowthroats are tied to the distribution of suitable freshwater and salt marshes with nearby willow thickets. Nests in marshy areas that are usually higher off the ground, where they are safer from flooding.

Food Habits

Common Yellowthroats forage on or near the ground, eating insects and spiders from leaves, bark, branches, flowers, or fruit in low vegetation. Though they mostly glean their food while perched, they may sally out from a perch to catch prey. Like many birds, Common Yellowthroats also eat grit, which possibly helps them digest food or adds minerals to their diet.

Movement / Home Range

The San Francisco subspecies of the Common Yellowthroat is endemic to the greater San Francisco Bay area of California. Is a resident in its breeding range, with some birds migrating to San Diego County for winter.

Reproductive Strategy

The female builds her well-concealed nest on or near the ground by building a platform of grasses and leaves, and then gradually weaves a loose, bulky outer cup of grasses and sedges. Sometimes a Common Yellowthroat nest has a roof, like the nest of an Ovenbird.

Other

The San Francisco Yellowthroat has undergone severe declines due to habitat loss and alteration. Breeding Bird Survey data are inadequate for trend assessment, but Common Yellowthroat populations are generally steady to slightly decreasing. For more information about this species, including occurrence, conservation strategies and recovery actions in specific states or regions, refer to the following resource: Shuford, W. D., and Gardali, T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=10427

<https://ecos.fws.gov/ecp/species/2084>

Bob Hall
1946 Grove St. Apt. 6
San Francisco, CA

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CONT.
BI-4

From: matth2003@earthlink.net
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR
Date: Monday, April 11, 2022 11:13:42 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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GC-1
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Thank you for your time,
Matthew Harrington

Ps I'm a Pacific Rowing Club parent and rowing crew has been the best thing for my son. There are a lot of kids, men's and women's teams down to middle school age, plus the kids from SI, and we all get a lot out of participating. Hope you can support their needs. Thanks.

Sent from my iPhone

From: [Jonathan Harris](#)
To: [CPC.LakeMercedWestEIR](#); [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Thursday, April 14, 2022 11:09:07 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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GC-1

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PD-2

Thank you for your time, Jonathan Harris 2036 Great Highway
San Francisco, CA 94116

From: [Deb Holcomb](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR (Julie Moore)
Date: Monday, April 11, 2022 2:47:08 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

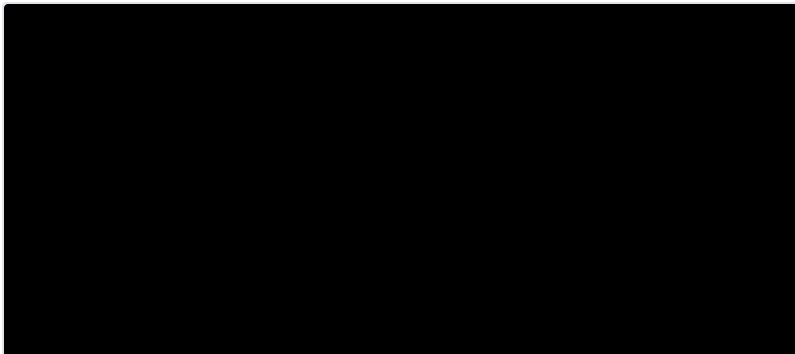
Exercise and athletics are an important part of many San Franciscan's lives, mine included. We are fortunate to have many extraordinary public facilities in San Francisco to support our pursuits whether you are a weekend warrior, an Olympic contender or somewhere in between all year long.

Golfers have Harding Park, now a world-class golf course that hosts professional tournaments. **Tennis players** have the newly upgraded facilities in Golden Gate Park. **Swimmers** have Sava recreational pools and others that have been significantly improved over the past decade. **Runners** have Kezar Stadium to train on a recently resurfaced track. **Soccer players** have top-notch fields near Ocean Beach.

Now it's time to consider what the rowing community needs. The facilities are not up to par. Please pause to reconsider how today's daily users of Lake Merced fit into the EIR.

Maybe it's because we row before the sun comes up that you haven't noticed us there. But there is a vibrant community rowing at Lake Merced as shown in this Sunset Beacon story:

[Pacific Rowing Club Host Regatta on Lake Merced](#)



Pacific Rowing Club Host Regatta on Lake Merced

More than 300 crews from around the Bay Area and as far away as

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PD-2

Newport Beach descended upon Lake Merced on Marc...

Just as SFRPD has considered the needs of other athletes -- runners, swimmers, golfers, tennis and soccer players, and others when it upgraded their athletic facilities, please consider the needs of the rowing community. I'd be happy to meet you any morning before work to row with you and show you how the facilities is used by youth and adults alike. I was hooked after the first stroke -- you might be surprised by how much you like it, too.

I want to echo the messages you've been receiving regarding the Lake Merced West site and the overlooked usage of the lake. Please invest in the planning now rather than spending more to fix it later. Talk to the stewards of the lake now who use it daily.

A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

Warmly,
Debra Holcomb
Lurline Street (D7)

1 CONT
PD-2

From: [drew.howard](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: 2019-014146ENV 520 JOHN MUIR DRIVE
Date: Thursday, March 31, 2022 1:54:25 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Howdy,

Here are the comments I made during the hearing 31 Mar 2022. Please include me in the response to questions.

Thanks

Drew Howard
196 Kenwood Way

Good afternoon, commissioners.

My name is Andrew Howard. I went to elementary school on the shores of Lake Merced at Frederick Burk School. I live in Mt Davidson Manor.

I bike around Lake Merced 5 mornings a week and frequently, when passing alongside the police pistol range just north of the project area, I will be jolted from my saddle by the loud reports of single or multiple shots coming from the range.

Later in the day at our house on Mt Davidson, a few blocks from Aptos Middle school, even here, 2.12 miles away, we can hear the gun reports. Although from here it is always more ominous because it also comes from the direction of Lakeshore Elementary school and Lowell High school and the fear of another school shooting is always present.

And now a recreation area is being planned on the parcel immediately south of the gun range.

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NO-1

This cannot be right.

Imagine a family on the ropes course and gunfire erupts nearby. The mom with PTSD from her service in Afghanistan is right there in mid air.

Has the impact of this range on the project been considered?

Thank you

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CONT
NO-1

From: [Genevieve Johansen](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Lake Merced west
Date: Wednesday, March 30, 2022 6:47:09 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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GC-1
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PD-2

Thank you for your time,

Genevieve Johansen

Sent from my iPhone

From: [Adrian Johnson](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Lake Merced West
Date: Wednesday, March 30, 2022 8:35:54 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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GC-1
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PD-2

Thank you for your time,

Adrian.

--
Adrian Johnson (a.johnson@pacificrowingclub.org)
U16 Men's Coach, Pacific Rowing Club

From: [Adrian Johnson](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR - ATTENTION Julie Moore
Date: Monday, April 4, 2022 3:15:15 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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GC-1
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PD-2

Thank you for your time,

Adrian.

--

Adrian Johnson (a.johnson@pacificrowingclub.org)
U16 Men's Coach, Pacific Rowing Club

From: [Amanda Kahn-Kirby](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#); [masonkirby](#); [Emmie Koenig](#)
Subject: Lake Merced West EIR - Attn Julie Moore
Date: Monday, April 11, 2022 10:33:25 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore, committee members, and staff,

I began rowing on Lake Merced back in 1997 as a UCSF graduate student new to San Francisco. Moving here from the strong rowing community in Philadelphia, I found a welcoming community at the UCSF Rowing Club, especially in their indomitable leader, the legendary waterwoman Mary Allen.

Fast forward 25 years, and all four members of my household have rowed with SFRC and Pacific during the pandemic. My daughter and husband are avid PRC team members; the opportunity to practice with a women's team outdoors during Covid-19 restrictions was life-changing for my teen. I'm writing this letter of support for expanded boathouse facilities at Lake Merced so that generations of families can continue to enjoy this unique San Francisco treasure.

The current boathouse facilities are inadequate to support community mixed use of the Lake Merced waterfront. I would like to see the city create an accessible facility that supports rowing, SUP, kayaking, dragon boats, and outrigger canoe activities for San Franciscans of all ages, backgrounds, abilities, and means. An expanded boathouse would allow for community-building events that introduce more people to the lifelong joy of exercising on water. If you've never skimmed across the lake at sunrise, watching the stars fade, seeing the birds and fish wake up, I urge you to try it just once, and see why so many people enjoy this sport for life.

As the process moves forward, I would like SFRPD to work together with the lake's most passionate users, the PRC/SI/SFRC/Dolphin clubs. Please replace the current EIR plan with the version that incorporates PRC/SI's vision for the lake, saving time and expense for Planning staff and the community. Most of all, please create an opportunity for more youth (and adults!) to experience water sports in San Francisco.

thank you,
Amanda Kahn-Kirby
Bernal Heights, SF



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PD-2

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GC-1

From: [Amanda Keene "24](#)
To: [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#)
Subject: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community"s Needs
Date: Sunday, April 10, 2022 8:12:50 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

1 - The plans in the Draft EIR continue to include a highly insufficient watercraft facility that falls short of the known needs and vision of the community. Existing and foreseeable future recreational demand is not adequately provided for, at the current boathouse at 1 Harding Rd or through the plans in the EIR, and the EIR's proposed plans would *not* add suitable water-oriented recreational facilities to the lake.

2 - Please replace the plans being used by the EIR with ones that incorporate the rowing community's jointly-created vision for the southeast portion of the site. Have the much larger facility be the primary plan in the EIR, not a discarded alternative. Include rowing leaders - those who know the sport - in the planning process.

3 - A new, much larger boathouse will make a difference in the lives of thousands of adults and young people of all backgrounds and abilities every year. The current boathouse at 1 Harding Road already cannot adequately serve the 400+ youth and adult rowers at the lake.

4 - The desperately-needed facility is essential for the community's joint vision of rowing at Lake Merced, one that not only expands youth rowing opportunities, but provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. It will be a true community center, one that provides a welcoming and engaging atmosphere for people of color and those who are traditionally underrepresented in the sport.

5 - The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport can develop and strengthen the mind and body of all who want to participate. It provides considerable pathways for advancement towards college if desired, and for a healthy and fulfilling life.

Help the rowing community change lives, and please recognize the legacy, vision, and expertise that the teams bring to the table.

Thank you for your time,

1
PD-2

Amanda Keene

From: [Ahmed Khaishgi](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Attention: Julie Moore for Lake Merced
Date: Saturday, April 2, 2022 3:32:37 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club. It has been an amazing experience that has helped my teenage son thrive and blossom, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

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GC-1

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

2
PD-2

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do. I can assure you first hand that rowing makes an immense difference to the well being of teenagers.

Thank you for your time,

Ahmed Khaishgi

455 Frederick Street, San Francisco, CA 94117

From: [Mason Kirby](#)
To: [CPC.LakeMercedWestEIR](#); [MelgarStaff \(BOS\)](#)
Subject: Lake Merced EIR
Date: Monday, April 11, 2022 9:47:46 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.


As opposed to the currently depicted concession stand, a rowing shell house has a different footprint and larger docking requirement which would require revisions or challenges to the EIR.

SFRPD's EIR document affirmatively excludes the prospect of a larger boathouse that would allow the rowing community to participate here. The SFRPD didn't earnestly consult with the rowing teams and we were led to believe in multiple community outreach meetings that the facility depicted would be changeable down the road.

Respectfully, please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

Thank you for your time,
Sincerely,
Mason Kirby


306 Precita Avenue
San Francisco CA 94110
(415) 867-5357

1
PD-2

From: [Peter Koenig](#)
To: [CPC.LakeMercedWestEIR](#); [Moore, Julie \(CPC\)](#)
Subject: EIR (Draft) Lake Merced West
Date: Saturday, April 9, 2022 11:36:34 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Moore,

I have been involved with the rowing community at Lake Merced, through the Pacific Rowing Club ever since my daughter Emmie first took up the sport as a high school student in 2000. I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) It appears to me that the SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and seem to ignore the major activity at the lake - rowing. The fact that SFRPD didn't consult with the rowing teams after their long time commitment to the Lake amazes me.

2) I would urgently request that SFRPD be tasked with promptly revising the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. We can save both taxpayer money and time by having the right plans in place the first time through. I feel this should happen before the Planning Department moves forward with creating the draft EIR.

3) A new, much larger and long overdue boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do for the community. I know from personal experience that it has been an invaluable benefit to numerous young athletes, especially women. Not only has the sport which involves both teamwork and individual effort been a tremendous asset to increasing an athlete's self esteem but it excels in the type of character building that stays with them for life.

Thank in advance for your consideration of this matter,

Peter Koenig

1
GC-1
2
PD-2

Email: CPC.LakeMercedWestEIR@sfgov.org , mejgarstaff@sfgov.org
Subject: Lake Merced West EIR ATTENTION Julie Moore

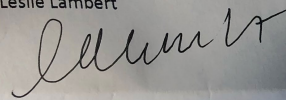
April 11, 2022

Dear Julia,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site. I made a public statement during the hearing as well.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support.

Thank you for your time,
Leslie Lambert



1
PD-2

From: [Joana Li](#)
To: [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Low, Allan \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Mcdonnell, Eric \(REC\)](#); [Fung, Frank \(CPC\)](#); [Hallisy, Joe \(REC\)](#); [Koppel, Joel \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Moore, Kathrin \(CPC\)](#); [Mazzola, Larry \(REC\)](#); [Buell, Mark \(REC\)](#); [Ginsburg, Phil \(REC\)](#); [Diamond, Susan \(CPC\)](#); [Imperial, Theresa \(CPC\)](#)
Cc: [MelgarStaff \(BOS\)](#); [Fieber, Jennifer \(BOS\)](#)
Subject: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community's Needs
Date: Thursday, March 31, 2022 1:36:59 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore and associated Commissioners and Staff,

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

1. SFRPD's proposed plans for the SE portion of the Lake Merced West site remain inadequate and don't reflect the known needs of the rowing community. The plans assessed in the EIR need to include a major boathouse with at least 14,000 sq/ft of boat storage space. Please replace the highly insufficient plans being used by the EIR with one that incorporates SI's and PRC's jointly-created vision for the SE portion of the site.
2. Rowing for All: The space is essential for the community's joint vision of supporting far more than the current 400+ youth and adults, one that provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. A *cornerstone* of this effort is increasing access and engagement for people of color and traditionally-underrepresented youth and adults.
3. The envisioned rowing center would provide for the most diverse range of San Franciscans. More adults and youth, of all abilities and backgrounds. The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport develops and strengthens the mind and body of all who want to row. It provides considerable pathways for advancement towards college, and for a healthy and fulfilling life beyond.
4. The entirety of the SE portion of Lake Merced West beyond the southern buildings should be committed to rowing-related facilities and operations, and not include arborist facilities. A boathouse depends on access to water, whereas an arborist facility does not.
5. Include rowing professionals and rowing community leaders in the planning process for the rowing center area, and let them lead or direct the layout and design of the boathouse and related facilities. Specifically involve PRC and SI, as they developed all of this for the first round in 2015 and 2016 and their combined communities are uniquely positioned to be essential assets in this effort.

Thank you for your time,
 Joan's Li

1
 PD-
 2

From: [heather luongo](#)
To: [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community's Needs
Date: Sunday, April 10, 2022 9:50:07 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

1 - The plans in the Draft EIR continue to include a highly insufficient watercraft facility that falls short of the known needs and vision of the community. Existing and foreseeable future recreational demand is not adequately provided for, at the current boathouse at 1 Harding Rd or through the plans in the EIR, and the EIR's proposed plans would not add suitable water-oriented recreational facilities to the lake.

2 - Please replace the plans being used by the EIR with ones that incorporate the rowing community's jointly-created vision for the southeast portion of the site. Have the much larger facility be the primary plan in the EIR, not a discarded alternative. Include rowing leaders - those who know the sport - in the planning process.

3 - A new, much larger boathouse will make a difference in the lives of thousands of adults and young people of all backgrounds and abilities every year. The current boathouse at 1 Harding Road already cannot adequately serve the 400+ youth and adult rowers at the lake.

4 - The desperately-needed facility is essential for the community's joint vision of rowing at Lake Merced, one that not only expands youth rowing opportunities, but provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. It will be a true community center, one that provides a welcoming and engaging atmosphere for people of color and those who are traditionally underrepresented in the sport.

5 - The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport can develop and strengthen the mind and body of all who want to participate. It provides considerable pathways for advancement towards college if desired, and for a healthy and fulfilling life.

Help the rowing community change lives, and please recognize the legacy, vision, and expertise that the teams bring to the table.

Thank you for your time,

1
PD-2

Heather Luongo

From: [Philip Luongo](#)
To: [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#)
Subject: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community"s Needs
Date: Sunday, April 10, 2022 10:04:06 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

As many in the rowing community have pointed out, the current plan is not sufficient to meet usage needs. As you know, the rowing community are frequent and respectful users of Lake Merced, and the vision for the future should properly contemplate the needs of this community, specifically with a larger facility than the one in the current plan.

Thank you for your consideration.

Phil Luongo
District 7 Resident
St. Ignatius Rowing supporter

1
PD-2

From: [Harrison Lynch](#)
To: [MelgarStaff \(BOS\)](#); [CPC.LakeMercedWestEIR](#)
Subject: Re: Lake Merced West EIR. ATTENTION: Julie Moore
Date: Monday, April 11, 2022 5:02:44 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake —rowing. The SFRPD didn't consult with the rowing teams, the resident experts. And given the common legal combat over EIR's and deviations from approved documents, the reassurances that the building marker is "only a placeholder" do not ring true.

1
GC-1

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

2
PD-2

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

4) The emphasis on a restaurant and concessions seems misguided and misspent - that footprint could be much better utilized by a boathouse or similar functions. And the revenue generation and meeting the needs of visitors to eat are better served by the increasingly common pattern of food trucks rather than the fixed infrastructure of a restaurant.

Thank you for your time,

Harrison Lynch

From: [Sarah Lynch](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR. ATTENTION: Julie Moore
Date: Monday, April 11, 2022 2:57:34 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake —rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

1
GC-1

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

1
PD-2

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

Thank you for your time,

Sarah Lynch

From: [Diane Matsumura](#)
To: [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#)
Cc: [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#)
Subject: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community's Needs
Date: Monday, April 11, 2022 4:50:39 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

1 - The plans in the Draft EIR continue to include a highly insufficient watercraft facility that falls short of the known needs and vision of the community. Existing and foreseeable future recreational demand is not adequately provided for, at the current boathouse at 1 Harding Rd or through the plans in the EIR, and the EIR's proposed plans would *not* add suitable water-oriented recreational facilities to the lake.

2 - Please replace the plans being used by the EIR with ones that incorporate the rowing community's jointly-created vision for the southeast portion of the site. Have the much larger facility be the primary plan in the EIR, not a discarded alternative. Include rowing leaders - those who know the sport - in the planning process.

3 - A new, much larger boathouse will make a difference in the lives of thousands of adults and young people of all backgrounds and abilities every year. The current boathouse at 1 Harding Road already cannot adequately serve the 400+ youth and adult rowers at the lake.

4 - The desperately-needed facility is essential for the community's joint vision of rowing at Lake Merced, one that not only expands youth rowing opportunities, but provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. It will be a true community center, one that provides a welcoming and engaging atmosphere for people of color and those who are traditionally underrepresented in the sport.

5 - The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport can develop and strengthen the mind and body of all who want to participate. It provides considerable pathways for advancement towards college if desired, and for a healthy and fulfilling life.

Help the rowing community change lives, and please recognize the legacy, vision, and expertise that the teams bring to the table.

Thank you for your time,

Diane Y. Matsumura
 Saint Ignatius Parent

From: [Robert Matsumura](#)
To: [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#); [CPC.LakeMercedWestEIR](#)
Cc: [CPC.LakeMercedWestEIR](#); [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#)
Subject: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community's Needs
Date: Monday, April 11, 2022 5:03:31 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

1 - The plans in the Draft EIR continue to include a highly insufficient watercraft facility that falls short of the known needs and vision of the community. Existing and foreseeable future recreational demand is not adequately provided for, at the current boathouse at 1 Harding Rd or through the plans in the EIR, and the EIR's proposed plans would *not* add suitable water-oriented recreational facilities to the lake.

2 - Please replace the plans being used by the EIR with ones that incorporate the rowing community's jointly-created vision for the southeast portion of the site. Have the much larger facility be the primary plan in the EIR, not a discarded alternative. Include rowing leaders - those who know the sport - in the planning process.

3 - A new, much larger boathouse will make a difference in the lives of thousands of adults and young people of all backgrounds and abilities every year. The current boathouse at 1 Harding Road already cannot adequately serve the 400+ youth and adult rowers at the lake.

4 - The desperately-needed facility is essential for the community's joint vision of rowing at Lake Merced, one that not only expands youth rowing opportunities, but provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. It will be a true community center, one that provides a welcoming and engaging atmosphere for people of color and those who are traditionally underrepresented in the sport.

5 - The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport can develop and strengthen the mind and body of all who want to participate. It provides considerable pathways for advancement towards college if desired, and for a healthy and fulfilling life.

Help the rowing community change lives, and please recognize the legacy, vision, and expertise that the teams bring to the table.

Thank you for your time,

Robert Matsumura
 Saint Ignatius Parent

1
 PD-2

From: [Elena McGahey](#)
To: [CPC.LakeMercedWestEIR](#); [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Monday, April 4, 2022 7:11:03 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced through Pacific Rowing Club (I am both a current coach and an alumni of the program). **I want to echo the messages you've been receiving regarding the Lake Merced West site.**

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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GC-1

2
PD-2

With gratitude,
Elena Marron McGahey

--
Elena M. McGahey (she/her)
415-867-5407
elena.mcgahey@gmail.com

From: [Katrin McManus](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Attention Julie Moore
Date: Monday, April 11, 2022 3:19:16 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

PRC has been an invaluable asset to our daughters life and gave her a sense of purpose and community especially during COVID times.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

1
GC-1

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PD-2

By asking for a bigger facility I am hoping that more youth will be able to benefit from having fun on the lake, learning about the importance of sustaining our environment and having a community to belong to.

Thank you for your time.
Sincerely, Katrin McManus

[Sent from Yahoo Mail for iPad](#)

From: [Carolyn McNulty](#)
To: [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#); [Moore, Kathrin \(CPC\)](#)
Cc: [Fieber, Jennifer \(BOS\)](#); [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community's Needs
Date: Sunday, April 3, 2022 3:15:55 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore and associated Commissioners and Staff,

I am a lifetime San Franciscan, and a current St. Ignatius Crew team parent, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

0. SFRPD's proposed plans for the SE portion of the Lake Merced West site remain inadequate and don't reflect the known needs of the rowing community. The plans assessed in the EIR need to include a major boathouse with at least 14,000 sq/ft of boat storage space. Please replace the highly insufficient plans being used by the EIR with one that incorporates SI's and PRC's jointly-created vision for the SE portion of the site.
1. Rowing for All: The space is essential for the community's joint vision of supporting far more than the current 400+ youth and adults, one that provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. A *cornerstone* of this effort is increasing access and engagement for people of color and traditionally-underrepresented youth and adults.
2. The envisioned rowing center would provide for the most diverse range of San Franciscans. More adults and youth, of all abilities and backgrounds. The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport develops and strengthens the mind and body of all who want to row. It provides considerable pathways for advancement towards college, and for a healthy and fulfilling life beyond.
3. The entirety of the SE portion of Lake Merced West beyond the southern buildings should be committed to rowing-related facilities and operations, and not include arborist facilities. A boathouse depends on access to water, whereas an arborist facility does not.
4. Include rowing professionals and rowing community leaders in the planning process for the rowing center area, and let them lead or direct the layout and design of the boathouse and related facilities. Specifically involve PRC and SI, as they developed all of this for the first round in 2015 and 2016 and their combined communities are uniquely positioned to be essential assets in this effort.

Thank you for your time,

CAROLYN McNULTY

Pronouns: she, her

From: [Tim Miller](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Monday, April 11, 2022 6:02:21 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

Thank you for your time,

Tim Miller
931 Rockdale Dr.

1
GC-1

2
PD-2

From: [David Milner](#)
To: [CPC.LakeMercedWestEIR](#); [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR, ATTENTION Julie Moore
Date: Monday, April 11, 2022 4:33:13 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I expect you've recently heard from a number of members of the Lake Merced rowing community. Well I'm one more. :)

As others have surely emphasized, rowing is **the** major activity on Lake Merced, yet the current plans for the Lake Merced West site were made without requesting input from the rowing community. I ask that you please direct SFPRD to reconsider their plans for the site, and to work with the rowing community to address our needs. Specifically, we - and the greater San Francisco community - would greatly benefit from a new aquatic center sufficiently sized to accommodate growth.

If I may offer a personal anecdote... I learned to row at age 28, and it changed my life. I tried the sport on a whim by taking a class at Santa Monica College, drawn not just to the grace and physicality of the sport, but to the intense teamwork it demanded. I quickly learned that not only did I love the sport, I was pretty good at it. As a skinny academic, it was the first time in my life I considered myself an athlete. The sport fundamentally changed my perception of myself. I've since gone on to run a marathon and to bike from San Francisco to Los Angeles, challenges I wouldn't have dreamed of undertaking before I started rowing.

But the entire reason I pursued those other sports is that when I moved to San Francisco in 2003, there was no place where someone my age could participate in sweep rowing. (At that time, the clubs for adults on Lake Merced only accommodated sculling, which I had not yet learned.) Sweep rowing would have required me to travel to Marin, Oakland, or Redwood City, none of which were practical options given my work situation. So when Pacific Rowing Club introduced a new Masters (adults) program this past fall, I jumped at the opportunity to join. It's been a tremendous outlet for me, helping to get this 50-year-old body back in good physical and mental shape. (I can't overestimate how much the sport and the club have helped with coping with the COVID crisis these past months.)

So as a direct beneficiary of the Pacific Rowing Club's recent expansion, nothing would make me happier than to see the club expand further, benefiting others as it has benefitted me. A new aquatic facility on the Lake Merced West site is critical to that effort. I therefore ask for your support in promoting this proposal.

Most sincerely,

David Milner
495 3rd Ave, #4
SF, CA 94118

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PD-2

From: [Chip Moreland](#)
To: [CPC.LakeMercedWestEIR](#); [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West Project - EIR Statement
Date: Sunday, April 10, 2022 11:02:05 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Agency Officials and Supervisor Melgar,

I am writing in support of the net Lake Merced West Project. I appreciate and support your position that the site needs to be cleared of all the old shotgun buildings. I also support the project objectives outlined in section 2.3 and want to see them fulfilled.

As a Local Business Enterprise who is familiar with the city of San Francisco's recreational infrastructure and a member of the Pacific Rowing Club I am very familiar with Lake Merced as an asset to our community. The proposals for a Multi-use Aquatic Center will maximize the asset of Lake Merced in a way that is environmentally balanced. This enhancement should be done in a way with outreach and inclusivity similar to the new golden gate tennis center's learning center with transportation and afterschool academic programs. See the strategic plan for Boston's Community Rowing Inc(CRI) for a great model of what can be with the correct infrastructure.

Thank you for your consideration,

Best,
Chip Moreland
579 9th Ave.
San Francisco, CA 94118
mobile 1-415-850-0658

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PD-3

From: [Morten](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [Dick Morten](#)
Subject: John Muir West Project EIR and new boathouse
Date: Thursday, March 3, 2022 3:02:12 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Julie Moore, The Public Notice for the Draft EIR indicates that "a new boathouse, boat dock and soft land area are proposed adjacent to the lake." In the zoom meetings Rec Park described a very small facility. Their project will certainly not meet the existing or booming growth demands of the rowing community for shell storage and related rowing areas.

I have reviewed numerous EIRs where the project is clearly delineated for environmental review. In those EIRs the project was described as to size, expected use objectives and environment parameters. In my opinion, the Rec Park boathouse description doesn't meet the standard for project evaluation.

I am concerned that the small Rec Park boathouse under EIR analysis will not adequately describe the potential for a larger rowing community boathouse.

*Will it require a supplemental EIR, requiring time and cost, should a decision be made at a later date to develop the rowing community's considerably larger boathouse?

*Should the rowing community's larger boathouse proposal be evaluated now in this EIR process?

Thank you for your response.

Dick Morten
(A non-rower and former Lake Merced Task Force member)

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PD-2

From: [Joshua Niclas](#)
To: [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community's Needs
Date: Monday, April 11, 2022 10:14:34 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

1 - The plans in the Draft EIR continue to include a highly insufficient watercraft facility that falls short of the known needs and vision of the community. Existing and foreseeable future recreational demand is not adequately provided for, at the current boathouse at 1 Harding Rd or through the plans in the EIR, and the EIR's proposed plans would *not* add suitable water-oriented recreational facilities to the lake.

2 - Please replace the plans being used by the EIR with ones that incorporate the rowing community's jointly-created vision for the southeast portion of the site. Have the much larger facility be the primary plan in the EIR, not a discarded alternative. Include rowing leaders - those who know the sport - in the planning process.

3 - A new, much larger boathouse will make a difference in the lives of thousands of adults and young people of all backgrounds and abilities every year. The current boathouse at 1 Harding Road already cannot adequately serve the 400+ youth and adult rowers at the lake.

4 - The desperately-needed facility is essential for the community's joint vision of rowing at Lake Merced, one that not only expands youth rowing opportunities, but provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. It will be a true community center, one that provides a welcoming and engaging atmosphere for people of color and those who are traditionally underrepresented in the sport.

5 - The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport can develop and strengthen the mind and body of all who want to participate. It provides considerable pathways for advancement towards college if desired, and for a healthy and fulfilling life.

I-Niclas

Help the rowing community change lives, and please recognize the legacy, vision, and expertise that the teams bring to the table.

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CONT.
PD-2

Sincerely,
Josh Niclas and Adrienne Fratini (parents of Thomas Niclas, St. Ignatius Crew Team)

From: [Christine Okon](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Attn: Julie Moore - West Lake Merced Concerns from Golden Gate Audubon
Date: Thursday, March 31, 2022 11:40:17 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Moore,

As a member of the San Francisco Conservation Committee for Golden Gate Audubon, I am confused and disturbed to read in the draft EIR report for the Lake Merced Project that “Construction and operation of the project would not have a substantial adverse effect on special status birds” and that “Construction and operation of the project would not have a substantial adverse effect on nesting bird wildlife nursery sites or result in an increase in bird collisions with project features.”

Bird populations in North America have declined by nearly 3 billion since 1970. One of the major contributing causes is habitat loss and human disturbance.

Per GGAS’s (Golden Gate Audubon Society) comments on the scope of the environmental review in the EIR planned for the project at Lake Merced West, dated July 8th, 2021, 277 species of birds have been observed at Lake Merced, the **highest number for any location** in San Francisco, according to eBird data. In addition to its importance to migrant birds foraging and passing through, Lake Merced is an important breeding area for a number of bird species.

Specifically, eBird data list 118 species recorded at the site of the former Pacific Rod and Gun Club, the location of the proposed West Lake Merced project. As recently as March 22, six species were noted by a reputable observer as displaying “possible” to “confirmed” breeding behavior. Included among them is a “Species of Special Concern”, the *San Francisco or Saltmarsh subspecies of the Common Yellowthroat, which was observed displaying probable breeding behavior. That subspecies is ranked “3” on both the federal and state level, indicating it is “vulnerable”. * *Shuford, W. D., and Gardali, T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento. California*

GGAS feels that the birds impacted by the work being proposed for the construction and operation of the project deserve at least the same level of mitigation proposed for the Western Pond Turtle and bat colonies.

I was also quite disappointed that none of the other concerns outlined in our letter of July 8th to Julie Moore of the SF Planning Department were reflected in the draft EIR. Our most important concerns are listed below:

1.

Native Vegetation Management and Restoration. Native plant communities support hundreds of native insects, birds, reptiles, amphibians and mammals. GGAS hopes a well-developed analysis will address what native and vegetation mixes can be used to enhance

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BI-4

the current vegetation mix at the site. In particular, the meadow area is now an important foraging area for finches, sparrows, and other birds. The EIR should address the impacts of any future plantings on the habitat value for birds and other wildlife and whether a grassland habitat can be re-established.

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CONT.
BI-4

2.

Artificial Lighting. Lake Merced lies on a significant path within the Pacific Flyway. Each year, particularly in fall (August – November) it is estimated tens of thousands of birds fly over this specific area. Most of this migratory movement occurs at night and it can be negatively impacted by lighting. The EIR should include an analysis of any additional light generated from the new facilities and nighttime activities planned for the site. It is well established that artificial lights have negative impacts on native wildlife by increasing predation, disturbing natural breeding and migration patterns, and altering foraging behavior. The EIR should address this issue.

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3.

Impacts of Increased Aquatic Recreation. The EIR should address the impacts of increased activity on the lake in the form of boating and fishing. In particular, mitigation for and recycling of discarded fishing line should be addressed. Also the possible impacts of members of the boating public entering and disturbing the marsh or anchoring boats to marsh vegetation should be included in the EIR.

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BI-2

4.

Bird Safe Building Design. The project should be designed in a manner which incorporates bird safety.

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BI-4

Thank you for your consideration. I look forward to answering any questions you may have.

Sincerely,
Christine Okon
Golden Gate Audubon Society

From: [Shannon O'Neill](#)
To: [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced Boathouse Plans
Date: Monday, April 11, 2022 11:14:37 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am a new member of the rowing community at Lake Merced by way of my daughter's participation in the St. Ignatius rowing program and I could not be more grateful that she found this sport! It has given her community and purpose like I've never seen before. She went from coming home, laying in bed and watching TV after school in January to now happily leaving everything she's got left in her tank on that lake 6 days/week. The transformation is nothing short of remarkable. This sport demands A LOT of its athletes but those who are willing to give it, get back tenfold. In a city where field and court resources are limited and have families driving to far flung parts of the city so their kids can participate and compete athletically with their peers, we need to do all we can to open more and more athletic avenues for our kids. Thus, I want to echo the messages you've been receiving regarding the Lake Merced West site and thank you for all the work you've done for the Draft EIR thus far.

1 - The plans in the Draft EIR continue to include a highly insufficient watercraft facility that falls short of the known needs and vision of the community. Existing and foreseeable future recreational demand is not adequately provided for, at the current boathouse at 1 Harding Rd or through the plans in the EIR, and the EIR's proposed plans would *not* add suitable water-oriented recreational facilities to the lake.

2 - Please replace the plans being used by the EIR with ones that incorporate the rowing community's jointly-created vision for the southeast portion of the site. Have the much larger facility be the primary plan in the EIR, not a discarded alternative. Include rowing leaders - those who know the sport - in the planning process.

3 - A new, much larger boathouse will make a difference in the lives of thousands of adults and young people of all backgrounds and abilities every year. The current boathouse at 1 Harding Road already cannot adequately serve the 400+ youth and adult rowers at the lake.

4 - The desperately-needed facility is essential for the community's joint vision of rowing at Lake Merced, one that not only expands youth rowing opportunities, but provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. It will be a true community center, one that provides a welcoming and engaging atmosphere for people of color and those who are traditionally underrepresented in the sport.

5 - The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport can develop and strengthen the mind and body of all who want to participate. It provides considerable pathways for advancement towards college if desired, and for a healthy and fulfilling life.

Help the rowing community change lives, and please recognize the legacy, vision, and expertise that the teams bring to the table.

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PD-2

Thank you for your time,

Shannon O'Neill

From: [Jen Panasik](#)
To: [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community's Needs
Date: Sunday, April 10, 2022 8:29:08 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

1 - The plans in the Draft EIR continue to include a highly insufficient watercraft facility that falls short of the known needs and vision of the community. Existing and foreseeable future recreational demand is not adequately provided for, at the current boathouse at 1 Harding Rd or through the plans in the EIR, and the EIR's proposed plans would *not* add suitable water-oriented recreational facilities to the lake.

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3 - A new, much larger boathouse will make a difference in the lives of thousands of adults and young people of all backgrounds and abilities every year. The current boathouse at 1 Harding Road already cannot adequately serve the 400+ youth and adult rowers at the lake.

4 - The desperately-needed facility is essential for the community's joint vision of rowing at Lake Merced, one that not only expands youth rowing opportunities, but provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. It will be a true community center, one that provides a welcoming and engaging atmosphere for people of color and those who are traditionally underrepresented in the sport.

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Help the rowing community change lives, and please recognize the legacy, vision, and expertise that the teams bring to the table.

Thank you for your time,

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PD-
2

- jen

From: [Chris Paras](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: New Boathouse at Lake Merced
Date: Monday, April 11, 2022 8:12:21 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

1 - The plans in the Draft EIR continue to include a highly insufficient watercraft facility that falls short of the known needs and vision of the community. Existing and foreseeable future recreational demand is not adequately provided for, at the current boathouse at 1 Harding Rd or through the plans in the EIR, and the EIR's proposed plans would *not* add suitable water-oriented recreational facilities to the lake.

2 - Please replace the plans being used by the EIR with ones that incorporate the rowing community's jointly-created vision for the southeast portion of the site. Have the much larger facility be the primary plan in the EIR, not a discarded alternative. Include rowing leaders - those who know the sport - in the planning process.

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5 - The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport can develop and strengthen the mind and body of all who want to participate. It provides considerable pathways for advancement towards college if desired, and for a healthy and fulfilling life.

Help the rowing community change lives, and please recognize the legacy, vision, and expertise that the teams bring to the table.

Thank you for your time,

Sent from my iPhone

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PD-2

From: [Mike Paul](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Lake Merced West
Date: Thursday, March 31, 2022 3:10:02 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

Thank you

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GC-1

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PD-2

From: [Racheal Perry](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: A New Boathouse - Fix SFRPD's Lake Merced West plans before EIR process continues
Date: Monday, April 11, 2022 3:11:43 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Recreation and Park Commissioners,

I'm reaching out to echo a number of recent emails you've received regarding the Lake Merced West site. I too am part of the San Francisco rowing community, as a member of the Dolphin Club, and I was disappointed to learn that the SFRPD didn't meet or partner with the resident rowing organizations before developing plans for the Lake Merced West site. The resulting plans for the SE end of that property are alarmingly inadequate and uninformed, and are now part of the EIR process! Lake Merced has a long and storied tradition of hosting Junior and Master competitive and recreational rowers. Why doesn't the city of San Francisco care about these existing communities or have any interest in growing these communities?

Please stand with the rowing community that has been at the lake for generations. Please direct the SFRPD to work with the current users and stewards of Lake Merced: Pacific Rowing Club, Saint Ignatius High School, Dolphin Club and San Francisco Rowing Club to incorporate the teams' jointly-envisioned rowing center into the site-wide SFRPD plans that are part of the EIR process.

We envision a major rowing facility of national and international recognition, managed by the teams, built around essential indoor space for more boats, equipment, and support facilities. A complex for the southeast end of the property that efficiently uses the entirety of the land beyond the buildings to serve the widest range of San Franciscans. It will enable the teams to vastly increase the number of people they can serve and how they can serve them, especially traditionally-underrepresented populations and historically-underserved youth and adults. Their vision includes more youth programming, additional adult recreational and competitive programs, adaptive and paralympic rowing (Veterans, recreational and therapeutic rowers, Olympic hopefuls, and those with developmental and acquired cognitive disabilities), strategic partnerships with local community groups, and general fitness programming for rowers and non-rowers alike. To be clear, the leadership of both the SI and PRC teams have publicly expressed these goals - even at City Hall.

The current facility at 1 Harding Road was not built to accommodate the expanding Jr. teams of SI's and PRC's. It is from a different era, where rowing was for a select few. The current teams fight against those old barriers of the 1950s, welcoming a diverse community of youth over 400 strong - but they are hobbled by lack of room! They must turn people away due to lack of space for equipment, which hurts current participants too. The teams must store some of their existing boats outside where they degrade, the boat bays are prohibitively cramped, and the building and facilities have areas of major disrepair. The teams cannot reach their true vision of "rowing for all" without more room, and thus the activity's social, physical, health, mental, and emotional benefits remain out of reach for many. SFRPD's recently proposed plan does nothing to address any of this.

Thank you for continuing to oversee our incredible Rec and Park system, and I hope we can join together in a few years and celebrate the groundbreaking of an incredible new boathouse.

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PD-2

I-Perry

Yours,
Racheal Perry
150 Peralta Ave
San Francisco, Ca 94110
Dolphin Club

From: [Claire Pettit](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: The Lake Merced west Project
Date: Thursday, March 31, 2022 4:12:59 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,
we are part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

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GC-1

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

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PD-2

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

Thank you for your time,

Claire & Saskia Pettit

From: [Bill Post](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Proposed SFRPD Lake Merced West Plan
Date: Monday, April 11, 2022 11:59:35 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Madame Moore:

I am writing to voice my concern about the proposed plans to develop the former Rod & Gun Club site on the west shore of Lake Merced.

I am a member of the San Francisco Rowing Club (SFRC), one of several rowing clubs and teams whose members row regularly on Lake Merced. I am concerned that the proposed plans for the Lake Merced West site are inadequate and poorly researched. I am particularly disappointed that SFRPD did not consult with the rowing community before producing a preliminary Plan and drafting an EIR. I am sure that effort was undertaken with good intentions, but it completely misses the mark! I respectfully beg SFRPD to reconsider the current proposals **WITH INPUT FROM PEOPLE THAT ACTUALLY USES THE LAKE!** Please do not waste more time and taxpayer money on a plan that won't work!

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GC-1

The rowing community at the Lake is comprised of Juniors, Seniors, former Olympians, National Team hopefuls, and ordinary recreational enthusiasts. Rowing has been an active sport on the Lake for many years, and hundreds of rowers row several times a week. Although the existing boathouse and dock at 1 Harding Road is undersized and decrepit, the rowing community **MANAGES** to thrive. Why is that? Perhaps it is because every rower is an Amateur, in the best sense of that word. We all want to see Lake Merced maintained as as a rowing venue, and as a vibrant recreational resource for all San Franciscans for years to come.

2
PD-2

Thank you for your consideration.

Sincerely,

William N. Post

From: [Powell, Wesley](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced EIR - Missing/ignoring Community input
Date: Monday, April 4, 2022 11:57:41 AM

Thank you.

I've participated in a few of the Lake Merced Community Planning Department EIR Meetings now. I am very concerned about the way the EIR and planned scope has evolved without community input being addressed. In fact, the community has been largely ignored and an opportunity for The City is being missed without a reason.

I'd like to know if the requests by Supervisor Melgar and the Planning commissioners at last weeks' meeting to ensure that the EIR address the prospect of a larger Boathouse in the EIR so that a larger boathouse can be built without going through any EIR process again. Can this please be confirmed?

1
GC-1

I'd like to note some points discovered and provided after attending a number of the EIR meetings on Lake Merced. From every indication, this EIR project appears to be railroaded/purposely on track to avoid and ignore public and community issues.

- While we in San Francisco have only one place to Row and Dragon Boat in San Francisco, the EIR places more basketball courts and other park amenities which can be placed on ANY land not next to this body of water at Lake Merced. The entire Lake Merced area has numerous places for these land based, non-water related activities. Reviewing a map of the entire Lake Merced area, I can easily identify 20 acres of land (not used by the golf course) for these uses. This current EIR plan is as illogical as placing a BBQ and benches in the middle of a golf fairway, a children's jungle gym in the middle of Kezar Stadium, or a sewage treatment plant in the middle of Golden Gate Park. Dozens of citizens young and old from all socioeconomic backgrounds have voiced their request for a larger boathouse while not one citizen has asked for the other amenities currently planned (e.g. basketball courts and pic-nic tables).

2
PD-2

- During the 'community meetings' a City representative planner explained that the scope and project "could be easily changed in the future, so it doesn't matter if a larger boathouse is proposed in the EIR on the site

3
PD-2

now.” However, this was a white lie/a placating remark by the EIR manager/speaker. It was clear in the Planning Dept Meeting last week that an EIR plan would be difficult to change in the future. Fortunately, a few of the Planning Commissioners and Supervisor Melgar specifically asked for the EIR to include an analysis for larger boathouse so it would not have to go through this process again. The EIR Speakers tried to placate the community and run the currently planned scope through knowing it would be an enormous if not impossible effort to make this change in the future. Shame on the leaders of the EIR and City Department for this attempt to pass through the community input with misleading half-truths. Kudos to the Planning Commissioners and Supervisor Melgar for calling this out and asking for a change.

3
CONT.
PD-2

- At a ‘community meeting’ the Lake Merced Property Manager said that the current boathouse is sufficient and therefore another larger boathouse for rowing is not needed. She is completely wrong, sounded angry at our concerns, and I’m surprised at the lack of knowledge of the needs of the constituents. The current boathouse does not meet the demand or needs of the community. There are 5 different clubs packed into the current facility, severely limiting the recreational services potential for San Franciscans. I asked a few rowing club leaders if the City Property Manager ever discussed this with them, and the answer is no. How can a Property Manager not want to understand what the community stakeholders want and actively ignore them? She should be an advocate, which she apparently is not. This would never happen in a customer focused business of government.

4
PD-2

- During a ‘community meeting’ whereby dozens of citizens expressed their views for an expanded boathouse, the comments were ignored, never addressed, or simply muted from the Zoom call. When written questions were required, my written questions were paraphrased incorrectly, then I was muted. The so called “Public Meetings” might check the procedural box for those pushing the current EIR plan, but they clearly did not take input or address input by the community.
- Why hasn’t the City Planning Department, The Lake Merced Property Manager, or EIR team ever met with the Citizen stakeholders who use Lake Merced? After attending a number of EIR so called ‘community

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GC-1

meetings,' I've learned that this has not happened. Except for Supervisor Melgar and a few Comissioners at the last meeting identifying the lack of public input addressed in the EIR, how can all of the others involved in the EIR process be obtuse?.

My hope is that the good work Supervisor Melgar can help bring, along with the few Planning Commissioners able to see the misguided EIR process at last weeks' meeting, will allow the Planning Department to engage with the community earnestly. Otherwise, I and others will know this project to be a travesty of government process.

Please address the concerns of the community.

Regards,

Wes Powell

Wes.powell@am.jll.com

415-948-8082

From: CPC.LakeMercedWestEIR <CPC.LakeMercedWestEIR@sfgov.org>

Sent: Monday, April 4, 2022 10:03 AM

To: Powell, Wesley <Wesley.Powell@am.jll.com>

Subject: [EXTERNAL] RE: Lake Merced EIR

Hello Mr. Powell,

The Draft EIR is available here: [Environmental Review Documents | SF Planning](#)

Or were you requesting a copy on a thumb drive or hard copy?

From: Powell, Wesley <Wesley.Powell@am.jll.com>

Sent: Thursday, March 31, 2022 2:09 PM

To: CPC.LakeMercedWestEIR <CPC.LakeMercedWestEIR@sfgov.org>

Subject: Lake Merced EIR

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi,

Please send me the Draft EIR for this project.

Wes Powell

From: [Jenny Rosen](#)
To: [CPC.LakeMercedWestEIR](#); [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Monday, April 11, 2022 6:12:05 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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Thank you for your time,
Jenny Rosen

--
www.jennyimprov.com

From: kimberly_rosenblum@yahoo.com
To: [CPC.LakeMercedWestEIR](#)
Subject: Lake Merced Boathouse
Date: Wednesday, March 30, 2022 3:24:20 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am a parent who has two children who are members of Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

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2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

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3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

Thank you for your time,

Kim ROSENBLUM

415-533-1178

From: [Sam Rosenblum](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Lake Merced Boathouse
Date: Wednesday, March 30, 2022 3:27:21 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
 - 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
 - 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.
- Thank you for your time,

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Sam Rosenblum

From: [Lynda Ruiz](#)
To: [MelgarStaff \(BOS\)](#); [CPC.LakeMercedWestEIR](#); [Lynda Ruiz](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Monday, April 11, 2022 3:37:37 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

Our family is part of the rowing community at Lake Merced, through Pacific Rowing Club (PRC), and I want to echo the messages you've been receiving regarding the Lake Merced West site. PRC is a wonderful resource for young people in San Francisco. Throughout the pandemic, PRC maintained its programming, adapting to various health mandates far more nimbly than schools did. For my son who has rowed with them since the fall of 2020, going to rowing was the highlight of his day. Throughout the 20-21 school year he was able to look forward to getting outside, being with his cohort and enjoying exercise after a day of zoom class. PRC serves kids from all over San Francisco and all walks of life. The boys in his boat go to public, parochial and independent schools. It is one of the few places San Franciscians really get to meet people outside their school and work towards a common goal. PRC is a wonderful resource and the City should do whatever they can to support this excellent program for young people.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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Thank you for your time.

Sincerely,
Lynda M. Ruiz

From: [Douglas Sanders](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: ATTENTION Julie Moore
Date: Monday, April 11, 2022 9:11:43 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I have been rowing on Lake Merced since 2007. My 14 year old daughter now rows with Pacific rowing club and it is great to share the sport with her. Any casual observer of Lake merced West will see that the most prevalent watercraft use of lake merced continues to be rowing, with some other watercraft (canoeists for example) also taking advantage of the access provided by the rowing program funded docks. The rowers generally use the lake in early mornings on weekdays and weekends and some afternoons on weekdays. For much of the weekend afternoons when the rowers aren't on the lake there aren't that many others making environmentally friendly use of this wonderful resource. Pacific rowing Club and other programs also offer scholarships to young rowers who can not otherwise afford the costs. As a SF resident of 15 years and active rower, I echo the concerns of PRC:

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

Thank you for your time and please don't hesitate to reach out to me with any questions about rowing at lake merced.

Regards,

Doug Sanders
415 405 5900

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From: [Jan Scott](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: ATTN Julie Moore, re: Lake Merced West
Date: Wednesday, March 30, 2022 2:09:50 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

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2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

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3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

Thank you for your time.

Regards,

Jan Scott

From: [Amelia Smith](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: EIR PLAN
Date: Wednesday, March 30, 2022 7:18:23 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

My name is Amelia Smith and I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the SE portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people - people the small current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

4) The rowing community is watching. We have been here for 45 years, and we will be here for longer. Rowing is not a dying sport, it is a community that lives on this lake. We are it's stewards. Lake Merced is my second home, and we need this new boathouse.

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Thank you for your time,

Amelia Smith.

Phone: 628-230-9181

Email: ameliawsmith2006@gmail.com

From: [David Tucker](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Rowing
Date: Tuesday, April 5, 2022 2:30:58 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I am here to echo the many comments being generated by the rowing programs on Lake Merced who think the existing EIR for the redoing of the old gun range property badly misses the mark in terms of creating a world-class site in San Francisco for all forms of rowing - high school, college, recreational, geriatric etc.

My son in the late 1980s had the athletic experience of his youth coxing PRC boats for three years. He was joined in that joyous activity by hundreds of other SF youth and many hundreds of other visiting rowers from around the state. The redoing of the site across the lake from the current "boathouse" for PRC and SI offers a once in a lifetime opportunity to create a new, updated and spacious setting for rowing that should in very little time draw many hundreds of additional rowers to Lake Merced and the City - a VERY good thing and much better than a space to sell trees and flowers.

Please listen to the active, vibrant voices of the local rowing community when it come to finalizing the EIR.

Dave Tucker and Pat Tucker (full time residents of SF since 1970 and full time supporters of SF high schools and their sports and rowing teams)

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PD-2

From: [Nicolas Vasquez](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West
Date: Monday, April 11, 2022 4:22:08 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I'm the U16 Women's coach at Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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Thanks,

Nick Vasquez
Pacific Rowing Club - U16 Women's Coach
UW '21

From: [Sheila Vaughan](#)
To: [CPC.LakeMercedWestEIR](#); [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Monday, April 11, 2022 9:37:04 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

- 1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.
- 2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.
- 3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

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PD-2

Thank you for your time,

Kind regards,

Sheila Vaughan

From: [Moore, Julie \(CPC\)](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Fw: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community's Needs
Date: Thursday, April 14, 2022 9:08:19 AM

Julie Moore
Principal Environmental Planner
Environmental Planning Division
San Francisco Planning Department
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7566 | www.sfplanning.org
[San Francisco Property Information Map](#)

From: Mary Walti <mary.walti@sbcglobal.net>
Sent: Sunday, April 10, 2022 10:32 PM
To: Tanner, Rachael (CPC) <rachael.tanner@sfgov.org>; Moore, Kathrin (CPC) <kathrin.moore@sfgov.org>; Diamond, Susan (CPC) <sue.diamond@sfgov.org>; Fung, Frank (CPC) <frank.fung@sfgov.org>; Koppel, Joel (CPC) <joel.koppel@sfgov.org>; Imperial, Theresa (CPC) <theresa.imperial@sfgov.org>; Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>; Ginsburg, Phil (REC) <phil.ginsburg@sfgov.org>; Moore, Julie (CPC) <julie.moore@sfgov.org>; Anderson, Kat (REC) <kat.anderson@sfgov.org>; Buell, Mark (REC) <mark.buell@sfgov.org>; Hallisy, Joe (REC) <joe.hallisy@sfgov.org>; Jupiter-Jones, Annie (REC) <annie.jupiter-jones@sfgov.org>; Low, Allan (REC) <allan.low@sfgov.org>; Mazzola, Larry (REC) <larry.j.mazzola@sfgov.org>; Mcdonnell, Eric (REC) <eric.mcdonnell@sfgov.org>
Cc: MelgarStaff (BOS) <melgarstaff@sfgov.org>
Subject: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community's Needs

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore,

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

- 1 - The plans in the Draft EIR continue to include a highly insufficient watercraft facility that falls short of the known needs and vision of the community. Existing and foreseeable future recreational demand is not adequately provided for, at the current boathouse at 1 Harding Rd or through the plans in the EIR, and the EIR's proposed plans would *not* add suitable water-oriented recreational facilities to the lake.
- 2 - Please replace the plans being used by the EIR with ones that incorporate the rowing community's jointly-created vision for the southeast portion of the site. Have the much larger facility be the primary plan in the EIR, not a discarded alternative. Include rowing leaders - those who know the sport - in the planning process.
- 3 - A new, much larger boathouse will make a difference in the lives of thousands of adults and young people of all backgrounds and abilities every year. The current boathouse at 1 Harding Road already cannot adequately serve the 400+ youth and adult rowers at the lake.
- 4 - The desperately-needed facility is essential for the community's joint vision of rowing at Lake Merced, one that

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not only expands youth rowing opportunities, but provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. It will be a true community center, one that provides a welcoming and engaging atmosphere for people of color and those who are traditionally underrepresented in the sport.

5 - The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport can develop and strengthen the mind and body of all who want to participate. It provides considerable pathways for advancement towards college if desired, and for a healthy and fulfilling life.

Help the rowing community change lives, and please recognize the legacy, vision, and expertise that the teams bring to the table.

Thank you for your time,

Mary and Joshua Walti
2210 34th Avenue
San Francisco, CA 94116
650.730.3718

From: [Mary Walti](#)
To: [CPC.LakeMercedWestEIR](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Ginsburg, Phil \(REC\)](#); [Moore, Julie \(CPC\)](#); [Anderson, Kat \(REC\)](#); [Buell, Mark \(REC\)](#); [Hallisy, Joe \(REC\)](#); [Jupiter-Jones, Annie \(REC\)](#); [Low, Allan \(REC\)](#); [Mazzola, Larry \(REC\)](#); [Mcdonnell, Eric \(REC\)](#)
Cc: [MelgarStaff \(BOS\)](#); [Fieber, Jennifer \(BOS\)](#)
Subject: Lake Merced West Draft EIR: Request for Replacement of Current Boathouse Plans with Plans Reflecting Rowing Community's Needs
Date: Thursday, March 31, 2022 7:47:01 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julie Moore and associated Commissioners and Staff,

I am part of the rowing community at Lake Merced, through St. Ignatius, and I want to echo the messages you've been receiving regarding the Lake Merced West site. Thank you for all the work you've done for the Draft EIR thus far.

1. SFRPD's proposed plans for the SE portion of the Lake Merced West site remain inadequate and don't reflect the known needs of the rowing community. The plans assessed in the EIR need to include a major boathouse with at least 14,000 sq/ft of boat storage space. Please replace the highly insufficient plans being used by the EIR with one that incorporates SI's and PRC's jointly-created vision for the SE portion of the site.
2. Rowing for All: The space is essential for the community's joint vision of supporting far more than the current 400+ youth and adults, one that provides adaptive/para rowing (Paralympics, Veterans, recovery and therapy), comprehensive recreational and competitive adult rowing, and general non-rowing fitness programming and community engagement. A *cornerstone* of this effort is increasing access and engagement for people of color and traditionally-underrepresented youth and adults.
3. The envisioned rowing center would provide for the most diverse range of San Franciscans. More adults and youth, of all abilities and backgrounds. The San Francisco rowing organizations believe that this sport builds teamwork and community, and that it gets youth and adults of all ages active and engaged. With resources at hand to support people of all financial backgrounds, the sport develops and strengthens the mind and body of all who want to row. It provides considerable pathways for advancement towards college, and for a healthy and fulfilling life beyond.
4. The entirety of the SE portion of Lake Merced West beyond the southern buildings should be committed to rowing-related facilities and operations, and not include arborist facilities. A boathouse depends on access to water, whereas an arborist facility does not.
5. Include rowing professionals and rowing community leaders in the planning process for the rowing center area, and let them lead or direct the layout and design of the boathouse and related facilities. Specifically involve PRC and SI, as they developed all of this for the first round in 2015 and 2016 and their combined communities are uniquely positioned to be essential assets in this effort.

Thank you for your time,
 Mary Walti
 2210 34th Avenue
 SF CA 94116
 Cell: 650.730.3718

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 PD-2

From: [T.W](#)
To: [CPC.LakeMercedWestEIR](#); [MelgarStaff \(BOS\)](#)
Subject: Subject: Lake Merced West EIR - Boat House Expansion, ATTENTION Julie Moore
Date: Monday, April 4, 2022 5:37:04 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Moore and Supervisor Melgar,

I am part of the Pacific Rowing Club community at Lake Merced, and highly value the continuation and improvement of high school and middle school rowing opportunities at the lake. I am writing to support the messages you've been receiving regarding the expansion and improvement of the boat house at the Lake Merced West site.

We are highly encouraged by the city's partnership with the Dragon Boat community at Lake Merced, and hope that you will similarly work with the Pacific Rowing Club community to support the development of the youth sport at the lake.

1) SFRPD's initial plans for the southeastern portion of the Lake Merced West site did not adequately address the needs of the rowing community. We appreciate the reassurances of the planning team that the initial site plan captured only the schematic placement of the planned boat house, and during the planning process the needs of the rowing community would be more fully addressed to make the boat house larger to better support the needs of the Lake Merced's existing rowing community.

2) Ultimately we would like to assist with the planning and development of a large aquatic center on the south east corner of the Lake Merced West site where skeet fields 8 & 9 were located. We would like this facility to be large enough to house Pacific Rowing Club, SI, the other two small boat clubs at the lake, and potentially other recreational watersports (kayaks, paddle boards, etc.), offices, locker rooms, and ERG rowing / workout rooms. We envision this planning effort as a wonderful opportunity to create a space that can broaden our boating community and allow more people to experience what the lake has to offer.

3) We are further encouraged that the city's arborists team are flexible in the placement of their office and storage yard. These facilities do not require a lake-side presence, while a rowing facility must be positioned adjacent to the lake in order to adequately function.

4) Please direct the SFRPD to promptly replace the plans being used by the EIR with

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ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Please save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the final EIR.

5) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the deteriorating existing facility at 1 Harding Road just can't support. Pacific Rowing Club is a great source of pride for San Francisco's rowing community. Please collaborate with and support our rowing club at Lake Merced in the same way the city partnered with the Dragon Boat community.

6) Please improve the water quality in Lake Merced to enhance the recreational experiences of lake visitors.

Thank you for your time and we look forward to working with you,

Ben Will
10th grade, Lowell High School

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CONT
PD-2

From: [PENNI WISNER](#)
To: [CPC.LakeMercedWestEIR](#)
Subject: Lake Merced West Project
Date: Saturday, April 9, 2022 7:31:47 PM

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Dear Julianne Moore, Senior Project Manager:

Having read the proposal for the development of the old Pacific Gun Club site, I am astonished that there is no mention of the current and historic uses of the lake itself. Nor how the multiple recreation opportunities envisaged will affect the health of the lake as well as its current uses.

The lake is home to several rowing clubs and the home base for middle school and high school rowing teams. A new masters rowing program started this year. A competitive rowing regatta for kids in March saw 300 boats on the lake in a single day!

As a member of the San Francisco Rowing Club who rows at Lake Merced two or three times a week year round, I ask you to incorporate the active rowing community in your development plans.

Sincerely,

Penni Wisner

Penni Wisner
3845 17th Street
San Francisco, CA. 94114
Penniw@pacbell.net
Sent from my iPhone

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PD-2

From: [Jennifer Yeh](#)
To: [CPC.LakeMercedWestEIR](#)
Cc: [MelgarStaff \(BOS\)](#)
Subject: Lake Merced West EIR ATTENTION Julie Moore
Date: Monday, April 11, 2022 9:16:03 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Julia Moore,

I am part of the rowing community at Lake Merced, through Pacific Rowing Club, and I want to echo the messages you've been receiving regarding the Lake Merced West site.

1) SFRPD's proposed plans for the SE portion of the Lake Merced West site are inadequate and uninformed, and ignore the major activity at the lake - rowing. The SFRPD didn't consult with the rowing teams, the resident experts.

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GC-1

2) Please direct the SFRPD to promptly replace the plans being used by the EIR with ones that incorporate PRC's and SI's jointly-created vision for the southeast portion of the site. Save taxpayer money and everyone's time by having the right plans in place the first time through. Please make it happen before the Planning Department moves forward with creating the draft EIR.

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PD-2

3) A new, much larger boathouse will make a difference in the lives of thousands of adults and young people that the small, current facility at 1 Harding Road just can't support. Please don't ignore the legacy the sport has at the lake, or the greater good it can do.

Thank you for your time,
Thanks,
Jenny

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**COUNTY AND CITY OF SAN FRANCISCO
PLANNING COMMISSION HYBRID MEETING**

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Reporter's Transcript of Proceedings

**REMOTE HEARING
via video and teleconferencing
MARCH 31, 2022**

**Regular Calender, Agenda Item #10
520 John Muir Drive, Lake Merced West**

Transcribed by:

Connie J. Parchman, RPR, CRR, CSR 6137

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Staff:

Jonas P. Ionin, Commission Secretary

Commissioners Present:

Rachel Tanner, President

Kathrin Moore, Vice President

Sue Diamond, Commissioner

Frank S. Fung, Commissioner

Theresa Imperial, Commissioner

Joel Koppel, Commissioner

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1 MARCH 31, 2022

AFTERNOON SESSION

2 P R O C E E D I N G S

3 ---000---

4 ...

5 SECRETARY IONIN: Commissioners, we now move on
6 to the regular calendar.

7 For Item 10, case number 2019-014146 E and D at
8 520 John Muir Drive, Lake Merced West. This is a Draft
9 Environmental Impact Report.

10 JULIE MOORE: Okay. I don't know if that needs
11 to go up, but -- do you want the presentation up?

12 Okay. All right. Good afternoon, President
13 Koppel and members of the commission.

14 I'm Julie Moore, Planning Department staff, and
15 environmental coordinator for the Lake Merced West
16 Project Environmental Impact Report, which was covered --

17 SECRETARY IONIN: I'm sorry, Julie. I guess
18 SFGov's not -- there we go. Thank you, SFGov.

19 JULIE MOORE: Thank you.

20 The EIR was published on February 23rd, 2021.
21 The item before you today is review and comment on the
22 Draft Environmental Impact Report, or Draft EIR, prepared
23 for the proposed project pursuant to the California
24 Environmental Quality Act, or CEQA, and San Francisco's
25 local procedures for implementing CEQA.

1 In my presentation today, I will provide you
2 with a brief description of the project site and the
3 proposed project, the project's significant environmental
4 impacts and mitigation measures and alternatives that
5 would reduce the project's significant impacts.

6 The project site is located on approximately
7 11 acres at 520 John Muir Drive on the southwest side of
8 Lake Merced in southwestern San Francisco.

9 The City and County of San Francisco, under the
10 jurisdiction of the San Francisco Public Utilities
11 Commission, SFPUC, owns the project site.

12 The San Francisco Recreation and Parks
13 Department, or RecPark, and SFPUC collectively manage
14 recreation activities at Lake Merced.

15 The former site tenant, the Pacific Rod and Gun
16 Club, built and operated skeet and trap shooting
17 facilities at the site from 1934 to 2015.

18 During these activities, lead shotgun pellets
19 and other debris fell onto the site and into the lake.
20 The project site was vacated by the Pacific Rod and Gun
21 Club in 2015 and is currently closed to the public.

22 After the gun club vacated the site, the SFPUC
23 implemented the Pacific Rod and Gun Club Upland Soil
24 Remedial Action Project, which included extensive soil
25 remediation under the oversight of the San Francisco Bay

1 Regional Water Quality Control Board.

2 Under the soil remediation project,
3 contaminated soils were excavated to depths of up to ten
4 and a half feet. The site was backfilled with clean fill
5 and some site features and vegetation were restored.

6 Because most of the buildings and structures on
7 the site are more than 50 years old, the entire site was
8 evaluated for its potential significance as a cultural
9 landscape.

10 A cultural landscape is a type of historical
11 resource that can include buildings, structures, and
12 natural elements that are significant as a grouping.

13 The historic resource evaluation determined
14 that the site is a cultural landscape that appears
15 eligible for listing in the National Register of Historic
16 Places and the California Register of Historical
17 Resources at the local level of significance. For this
18 reason, the project site is considered a historical
19 resource as defined under CEQA.

20 This figure shows the existing site following
21 the soil remediation and the contributing features of the
22 history cultural landscape, the four skeet fields, the
23 rifle range building, Shell House, Clubhouse and
24 Caretaker's Building.

25 RecPark proposes the Lake Merced West Project

1 to create a recreational facility at the site and would
2 manage recreation through the selection and oversight of
3 a concessionaire to construct and operate the facility.

4 The Lake Merced West Recreation Facility would
5 offer active and passive activities to the public, such
6 as trail use, picnicking, paddle boarding, kayaking,
7 fishing, fitness activities, a ropes course,
8 birdwatching, outdoor exercise, skateboarding, basketball
9 and other activities on multi-use court, as well as
10 restaurant dining and indoor space for community
11 gatherings.

12 Based on their condition, the existing
13 buildings would be demolished.

14 A new community building, restaurant and
15 outdoor patio would be built near the center of the site,
16 along with a playground, multiuse court, basketball
17 court, and picnic areas surrounded by meadows and natural
18 areas.

19 A new boathouse, boat dock and water craft soft
20 landing area are proposed adjacent to the lake.

21 An arborist office and yard are also proposed
22 at the southeastern end of the site. New restrooms, a
23 ropes court and skate park are proposed on the west side
24 of the site and the facility would have 80 public parking
25 spaces.

1 The recreation facility would operate primarily
2 during daylight hours and the restaurant would be open
3 until 9:00 P.M.

4 Special events hosting up to 500 people, such
5 as weddings, community events, and group events would be
6 permitted up to 12 times per year.

7 Additionally, the SFPUC arborist team would
8 operate a small office at the project site and store
9 vehicles and equipment at the yard. Typically the
10 arborist office would -- and yard would operate between
11 6:30 A.M. and 3:00 P.M. Monday to Friday.

12 The buildings that contribute to the historic
13 cultural landscape are small, one-story wood frame
14 buildings. These photographs show the Clubhouse,
15 Caretaker's House, Rifle Range Building and the Shell
16 House.

17 These photographs show a semicircular skeet
18 field, high and low houses and a safety fence, which also
19 contribute to the historic cultural landscape.

20 This site plan depicts the proposed project
21 features. Only one of the contributing features of the
22 historic landscape, Skeet Field 4, would be retained and
23 adaptively reused as a picnic area. All other
24 contributing features would be removed.

25 Now I would like to provide you with a brief

1 summary of the findings of the Draft EIR.

2 The Draft EIR found the project would have
3 significant and unavoidable impacts on the historic
4 cultural landscape, even with mitigation measures that
5 provide for documentation of the historic resource, oral
6 histories and an interpretive program.

7 The Draft EIR also found that impacts on noise,
8 biological resources and paleontological resources would
9 be significant but could be mitigated to a
10 less-than-significant level with the measures shown on
11 this slide.

12 All other impacts from the proposed project
13 were found to be less than significant or no impact.

14 The Draft EIR analyzed three project
15 alternatives, including the no project alternative
16 required by CEQA.

17 Under the no project alternative, there would
18 be no changes to the project site. The buildings would
19 remain boarded up and because they do not comply with
20 current building codes and are in disrepair, they would
21 be unfit for public use. Because of the hazards to
22 public safety from both the buildings and residual soil
23 contamination, the site would remain closed to the
24 public.

25 The full preservation alternative would retain

1 all the contributing features of the historic cultural
2 landscape, except the Shell House.

3 The Clubhouse, Rifle Range Building and
4 Caretaker's House would be rehabilitated for use as a
5 clubhouse, restaurant and storage respectively, although
6 the layout, size and locations of these buildings would
7 not be ideal for contemporary recreational uses. All
8 four skeet fields would be retained and the playground
9 would not be constructed. This alternative would meet or
10 partially meet the project objectives.

11 The partial preservation alternative would
12 retain two of the four skeet fields, adaptively reusing
13 one as picnic area. The Clubhouse and the Caretaker's
14 House, a new restaurant would be constructed at the
15 center of the site, along with the playground and sports
16 courts dividing the linear arrangement of skeet fields.

17 This alternative would meet or partially meet
18 more project objectives than the full preservation
19 alternative as more modern recreational facilities would
20 be constructed.

21 The no project and full preservation
22 alternative would reduce the significant and unavoidable
23 impacts on the historic resource. Although the partial
24 preservation alternative would retain more of the
25 contributing buildings and features of the historic

1 cultural landscape than the project, it would still
2 result in the demolition of almost half of the
3 contributing features of an historic resource resulting
4 in an impact that would be significant and unavoidable
5 with mitigation.

6 The full preservation and partial preservation
7 alternatives would have similar impacts on noise,
8 biological resources and paleontological resources as the
9 proposed project which would be less than significant
10 with implementation of mitigation measure.

11 The no project would not result in new impacts.

12 We're here today to receive comments from the
13 public and the commissioners on the Draft EIR. For
14 members of the public who wish to provide verbal
15 comments, please state your name for the record. Please
16 speak slowly and clearly so the Planning Department can
17 make an accurate transcript of today's proceedings.

18 Staff are not here to respond to comments
19 today. Comments will be transcribed and responded to in
20 a response to comments document, which will respond to
21 all relevant verbal and written comments received during
22 the public comment period and make revisions to the Draft
23 EIR as appropriate.

24 The Draft EIR for the proposed project was
25 published on February 23rd and the public review period

1 extends until April 11, 2022.

2 Those who are interested in commenting on the
3 Draft EIR in writing may submit their comments to me at
4 CPC.LakeMercedWestEIR@SFGov.org or mail them to Julie
5 Moore, 49 South Van Ness Avenue, Suite 1400,
6 San Francisco, 94103 by 5:00 P.M. on Monday, April 11th,
7 2022, when the public comment period closes.

8 All commenters who provide their contact
9 information will receive a notice of availability of the
10 responses to comments document, also known as the Final
11 EIR, when it is published.

12 If you are providing verbal comments today and
13 you wish to receive this notice, or if you wish to
14 receive a hard copy or electronic copy of the Draft or
15 Final EIR, please provide your contact information to the
16 email address above or call me at (628)652-7566 and leave
17 a message with that information.

18 This concludes my presentation.

19 Thank you.

20 PRESIDENT TANNER: I think we're ready for
21 public comment and I want to see if Supervisor Myrna
22 Melgar would like to say a few words.

A-SFBOS

23 SUPERVISOR MELGAR: Thank you so much. I'm so
24 excited to come before you for the first time and in
25 person.

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1 So, I am Myrna Melgar, Supervisor for District
2 7 and Lake Merced is part of my district. And I have
3 been working with the community on this for over a year,
4 since I was elected.

5 First I wanted to say thank you so much to the
6 Recreation and Parks Department and to the planning staff
7 for the work in this document.

8 It is -- Lake Merced is the jewel of our city.
9 It provides natural habitat for water, wilderness and
10 fowl and ducks and all kinds of wildlife, including the
11 famed west side coyotes, who you may have heard of.

12 But it also provides recreational opportunities
13 for young people and old people and everything in between
14 in our city.

15 And specifically for the Pacific Rowing Club
16 and the St. Ignacius Rowing Club, along with the drop-in
17 folks, who have been growing in their participation in
18 those activities over the last few years.

19 So this EIR we support. We do not support the
20 partial alternative or the no alternative.

21 Obviously Lake Merced has been neglected for a
22 long time. Over the years we've been able to clean up
23 the lead, to do a bunch of improvements, the boathouse,
24 that are just sorely needed.

25 However, I'm here to just put on the record

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1 that the project that is proposed as, you know, the full
2 project alternative is not necessarily what the community
3 supports.

4 And I wanted it to be on the record because
5 when we have the funding to go ahead with redeveloping
6 the site of the lake, we want to make sure that the
7 desires and the needs of the community are reflected.

8 The Pacific Rowing Club specifically has been a
9 point of access for underserved youth to get into rowing,
10 which has traditionally been an activity that has been
11 more exclusive because of the expense, you know. And
12 they have a waiting list particularly during the summer,
13 that they can't -- they can't fill.

14 At -- the current facilities are very
15 neglected. And, in fact, a little bit dangerous.

16 So the opportunity to move things to the other
17 side and to make them have the capacity to serve not just
18 the needs that we currently have, but to grow the access
19 to the lake is really, really important.

20 So I'm just here to state on the record that I
21 understand that the Recreation and Parks Department
22 position is that they don't need to put it in the EIR,
23 the community did have lots of input about this. I
24 wanted it to be on the record with the Planning
25 Commission that we wish the facilities that were being

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1 presented in the EIR included a larger boat dock and
2 space for more boating, because that is what the
3 community currently needs.

4 And that we're hoping that in the future as we
5 make this sport more equitable and access to west side
6 park resources, more equitable, we can just grow our
7 capacity and build our infrastructure to make that
8 happen.

9 So thank you so much for considering our little
10 corner of the world. And I want to particularly thank
11 Dick Morton and Coach Sam Nelson with the SI Rowing Club
12 for being great and participating in this process.

13 Thank you.

14 PRESIDENT TANNER: Great. Thank you,
15 Supervisor. Thank you for visiting us today.

16 SECRETARY IONIN: Members of the public, this
17 is your opportunity to address the commission on this
18 matter.

19 You can just line up on the screen side of the
20 room and we'll just take you all in the order you line
21 up.

I-KOENIG_E

22 Through the chair, you'll have two minutes.

23 EMILY KOENIG: Hello, my name is Emily Koenig.
24 I am the Program Director at Pacific Rowing Club at Lake
25 Merced. I represent all the rowing communities there, as

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1 they are here with us. The adult rowers are also
2 involved.

3 I've been involved in the rowing community at
4 Lake Merced for 20 years. And, yes, that is over half of
5 my lifetime.

6 And I would like to request a modification to
7 the Lake Merced Draft EIR of the addition of a much
8 larger aquatic center to the lower southeast side -- site
9 where the former skeet fields 8 and 9 are located.

10 I think Pacific Rowing Club in particular
11 really shares the same objectives as the project and
12 believe that we can fulfill a great portion of them.

13 I was -- just a little bit about myself, I was
14 born and raised in San Francisco in Bernal Heights. I
15 went to Rooftop, Lowell, spent my summers at Camp Mater.
16 I love my city. I also really love my program.

17 And I just want to get rowing into as many
18 people's lives as possible because I think it's a very
19 true and honest sport. And I think it can benefit anyone
20 no matter where you come from, who you are. And I just
21 want to see that happen, especially for the youth being
22 able to get recruited to go to college. Like the doors
23 open. Like I was recruited to UC Berkeley. It's
24 incredible how much rowing changed my life.

25 And I went right back to my rowing club to do

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PD-2

1 that for others.

2 I would say that this process, I've been
3 feeling a little boxed out by not really knowing what's
4 going on. And then having our comments not really be
5 heard. And not knowing what we need to do.

6 Like, we are willing and able and we want to
7 create a great community center at the lake and make Lake
8 Merced a tremendous force.

9 And we just need to be told what we need to do
10 and we're ready to do it.

11 Thank you.

I-NELSON

12 SAM NELSON: Good afternoon, commissioners. My
13 name is Sam Nelson. I'm a 19-year member of the rowing
14 community, not 20. Emily has me beat.

15 I was born in San Francisco, I went to SI. I
16 speak for myself here, but also as a part of the long
17 alumni group of -- both teams have been here about 40
18 years.

19 I'm also a nurse at S.F. General in the ICU so
20 I've been busy the last couple years, as you might
21 imagine.

22 I want to make one final note too in my own
23 introduction, as part of my graduate studies, I have
24 specifically studied DEI efforts, but specifically in the
25 sport of rowing. So bringing the sport to the widest

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1 population possible, not just people of color, people all
2 of physical abilities is a heart's goal of mine. And I
3 think San Francisco Lake Merced can really do that.

4 The current facilities, as you've heard, just
5 don't allow us to do that.

6 The proposed facilities and the plans simply
7 don't provide that either. A 3,000 square foot place for
8 paddle boards and kayaks are -- lose the vision of what
9 this lake could provide for the community.

10 I would like to reiterate to something akin to
11 a 14,000 square foot facility in that southern-most
12 portion. Simple structure. Would provide future
13 resources for adaptive rowing, veteran rowing, additional
14 youth rowing, adult rowing, comprehensive programming.

15 As Supervisor Melgar just mentioned to me that
16 the PUC has already agreed to move the arborist facility,
17 which was a really big sticking point in our frustrations
18 and concerns. So that sounds incredible.

19 I just wanted to thank you for your time. It's
20 a huge amount of work you have to do and that document is
21 impressive. So thank you very much.

22 ** ** Start edit here I-CALLIES-1

23 GAVIN CALLIES: Hi. Good afternoon,
24 commissioners.

25 My name is Gavin Callies and I'm also here on

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1 behalf of the Pacific Rowing Club regarding the
2 development of Lake Merced West.

3 I didn't realize that Supervisor Melgar would
4 be here this afternoon, so I appreciate everything she
5 said and she took most of the words out of my mouth.

6 But I do -- I just want to reiterate everything
7 that's been said already. The facility that's been
8 drafted up for this EIR is a bit on the small side. We
9 are trying to grow our program. We're trying to help the
10 community more, you know. We just started an adult
11 program six months ago or so.

12 And you know, we've gotten people who have
13 rowed before and we've gotten people who haven't rowed at
14 all and we've gotten people who just are coming out to
15 row with, like, their kids. And they're making these
16 connections and they're doing all these things that --
17 sorry.

18 Just are making a big influence on their life.

19 I was the first person in my family to graduate
20 from a four-year college and rowing definitely opened the
21 door for me to do that.

22 And I'm sticking here with PRC and I'm helping
23 them out and doing things around to make sure things go
24 better.

25 It would be just really great if we could have

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PD-2

1 more opportunities and bigger facilities to see our
2 vision and help more people and just keep our community
3 together. Thank you.

I-ANONYMOUS

4 RICH: Good afternoon, commissioners. Rich.
5 Nice to see you.

6 You pulled me out of my day off, usually you
7 will see me with a nice fresh shave and a suit. I will
8 probably see you next Thursday. But, that was my coach.

9 I started rowing in 1990. Stopped. Didn't
10 have a chance to pick up an oar until last year.

11 And what I can tell you is that we have a
12 once-in-generational opportunity to change the face of
13 rowing.

14 Nothing has changed in rowing from my
15 perspective over the last 30 years, since I last picked
16 up an oar.

17 We were in San Diego, lot of very similar
18 faces, lot of very similar tribal contingencies with
19 regard to teams. I think the sport of rowing has an
20 opportunity to change the nature of the sport and the
21 ability for people to participate in it at different
22 levels.

23 I will tell you that I support the EIR in its
24 full capacity. But as everyone has mentioned before,
25 there are some key architectural distinctions that would

1 make a boathouse that is slightly larger, much more
2 functional, and much more inclusive.

3 So the reason why I'm in my pajamas and
4 unshaven is I actually read the 800-page EIR report this
5 morning and said: Hey, I get to see you in person.
6 Let's do it.

7 So, I appreciate your time. But specifically,
8 the exclusion of the larger boathouse in consideration in
9 Section 563 got me up out of bed this morning to share my
10 comments with you today.

11 So thank you.

12 Oh, can I put this in the record?

13 SECRETARY IONIN: Yes, of course.

14 Thank you. With that concludes comments from
15 members of the public in the chambers.

16 We'll go to our remote callers. You need to
17 press star 3 and when you hear that your line has been
18 unmuted that's your indication to begin speaking.

19 ANDREW HOWARD: Good afternoon, commissioners.

20 My name is Andrew Howard. I went to elementary
21 school on the shores of Lake Merced at Frederic Burk
22 School. I live in Mount Davidson Manor.

23 I bike around Lake Merced five mornings a week
24 and frequently when passing alongside the police pistol
25 range just north of the project area, I will be jolted

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PD-2

I-HOWARD-1

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1 from my saddle by wild reports of single or multiple
2 shots coming from the range.

3 Later in the day at our house on Mount Davidson
4 a few blocks away from Aptos Middle School, even here,
5 2.12 miles away, we can hear the gun reports. Although
6 from here, it's always more ominous because it also comes
7 from the direction of Lakeshore Elementary School and
8 Lowell High School and the fear of another school
9 shooting is always present.

10 And now a recreational area is being planned on
11 the parcel immediately south of the gun range. This
12 cannot be right.

13 Imagine a family on the ropes course and
14 gunfire erupts nearby. The mom, with PTSD from her
15 service in Afghanistan is right there in mid air.

16 Has the impact of this range on the project
17 been considered?

18 Thank you. I-POWELL-1

19 WES POWELL: Good afternoon, planning
20 commissioners.

21 My name is Wes Powell and I'm a parent of a
22 rower at PRC and rower myself. Long-time resident of
23 San Francisco.

24 I want to thank everybody for their work on
25 this project because it is a terrific opportunity for

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1 San Francisco on the only body of water that we have that
2 can -- can do some of these sports that we're talking
3 about.

4 We do have a lot of opportunities for tennis
5 courts and basketball courts and parks, but only one
6 place for water sports, which is a world class sport.

7 I want to thank Supervisor Melgar for her
8 unbelievably clairvoyant, the fact that the needs and the
9 desires of the community are not being met by this EIR.

10 And I'm sorry to say this, but I was very
11 disappointed in the number of the community meetings that
12 were held by Parks and Rec because members of the
13 community were stonewalled. They were boxed out. I was
14 muted. I was not allowed to have questions. And,
15 frankly, they did not listen to the needs of the
16 community.

17 So Supervisor Melgar, thank you. And please,
18 keep pushing for the right things for the city and for
19 the community.

20 It just seemed like the Parks and Rec
21 department in the EIR process and the property manager of
22 there just had a train on the track and weren't ready,
23 willing or able to listen to the people.

24 So I want to thank you and please know that
25 while we all support this for the city, we do need

1 leadership like you to make sure it doesn't change.

2 Thank you very much, commissioners.

3 CHRISTIAN WAWRZONEK: Hello, commissioners.

4 My name is Christian Wawrzonek. I am the men's
5 coach at PRC. I-WAWRZONEK

6 I want to echo what's been said before and
7 thank you all very much for all the work you put into
8 this project. It is so important to us, which is why
9 you've seen the huge groundswell of community support
10 here for this.

11 I just wanted to reiterate what's people have
12 been saying, which is the space on the lot for a larger
13 boathouse is insufficient.

14 And I also wanted to add that the community of
15 not just PRC, but also St. Ignatius and S.F. Rowing Club
16 and Dolphin Club, the rowing community in San Francisco
17 has grown to become so vast and vibrant in the past
18 decades that we're more than willing to leverage our
19 community and -- in order to create a groundswell in
20 order to help push any new project happen through
21 financially.

22 We're not depending on the city. We're not
23 asking for any major boathouse to be built by you. We're
24 just asking for the space to be allotted for us to raise
25 the project to build our boathouse ourselves.

1 Because that's the most important thing for us
2 is to give us the space to expand our community
3 organically. And to use this beautiful lake to expand
4 the rowing community throughout the entirety of
5 San Francisco.

6 So thank you very much. I-LAMBERT-1
7 LESLIE LAMBERT: Supervisors, thank you so much
8 for your time. My name is Leslie Lambert. I am
9 currently a parent and rower and have been part of the
10 PRC community for close to ten years at this point.

11 I have a son who is now in college who went to
12 the program in high school and it was absolutely life
13 changing for him.

14 It takes a lot of time to be a good rower. And
15 it was wonderful that he was able to spend time in such a
16 great place where physical health and team work are such
17 strong values.

18 I now have a second child who is in middle
19 school at Marina Middle School who has joined the program
20 and it's just been such a joy to see that over the past
21 few years, not only has Pacific Rowing Club supported the
22 high school rowers that they have a long history with,
23 they expanded the program to support younger kids, who
24 frankly don't have a ton of sports opportunities in
25 middle school that are, you know, really (inaudible) and

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1 community based.

2 And I just think it's such a special place.
3 And in fact the middle school program at Pacific is
4 incredibly robust and incredibly diverse. Much more
5 diverse than the concert team that my child used to be
6 part of.

7 I also started rowing as an adult about six
8 months ago. And my coach Gavin was speaking earlier and
9 I can just say -- you know, a middle-aged person in
10 San Francisco, being able to have a place of community
11 for myself and for the other group of adults has been,
12 again, just so life changing opportunity.

13 So I do really appreciate the support in the
14 EIR and I really believe that the --

15 SECRETARY IONIN: Thank you, that is your time.

16 LESLIE LAMBERT: -- future is really --

17 SECRETARY IONIN: Ma'am.

18 BART MURPHY: Hello?

19 SECRETARY IONIN: Yes, go ahead.

20 BART MURPHY: Hi, commissioners. I-MURPHY

21 My name is Bart Murphy. I'm a San Francisco
22 resident and my son Dennis has been a member of the PRC
23 and -- both PRC and SI rowing club.

24 I'm calling to support the Draft EIR and add my
25 comments in support of Supervisor Melgar and the speakers

1 from both rowing clubs. And requesting that somebody
2 within the public service reach out to the rowing clubs
3 and let them know the best way possible to advance their
4 ideas in this process.

5 A lot of work was put into the adding comments
6 of the EIR when it was being handled by Park and Rec and
7 for some reason, it didn't -- those comments didn't get
8 highlighted or make it into this analysis in front of
9 you.

10 So, I would ask you to take that onboard and it
11 would be fantastic if someone from the Planning
12 Department would reach out and provide that community
13 service to -- to these interested parties.

14 I will add my comments in a letter and
15 supplement it for the record.

16 Thank you very much.

17 SECRETARY IONIN: Okay. Last call for public
18 comment. You need to press star three to be added to the
19 queue.

20 Seeing no additional requests to speak from
21 members of the public, public comment is closed and this
22 matter is now before you, commissioners. **A-TANNER**

23 Again this is for your review and comment only.

24 PRESIDENT TANNER: Thank you. I want to just
25 first thank all the callers and those here in the room,

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1 thank you, Supervisor, for joining us and for those who
2 are participating not only today, but throughout the
3 development of this plan, certainly want to support your
4 comments and I just want to thank staff as well for your
5 very thorough review as usual. Very comprehensive EIR.

6 Certainly I think what -- if I understand the
7 EIR correctly, the larger boathouse was considered but
8 was not included because it was deemed to not have
9 additional environmental impacts by having a larger
10 boathouse.

11 Certainly can appreciate the concern, though,
12 and the desire that having it in there feels a little
13 extra secure, that there's extra space, it's been
14 considered. And so if things change between now and when
15 the park comes to fruition and perhaps even future
16 expansions, if incremental progress is made that the
17 environmental is not the hurdle that we have to get over
18 to have additional space.

19 I just want to acknowledge those comments and
20 we really do hear what you're saying, your perspective on
21 that.

22 The only thing I can say, I really can't wait
23 to go to this park. It looks really fun. That's pretty
24 much my only comment. It's not really EIR centric, but
25 I'll look to other commissioners.

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1 I see Commissioner Koppel and Commissioner
2 Imperial.

3 And Commissioner Moore. **A-MOORE** Sorry about that.

4 Commissioner Moore, do you want to go first?
5 Then Commissioner Koppel and then Commissioner Imperial.

6 COMISSIONER MOORE: I just wanted to say that
7 public comments have been extremely important. I thank
8 everybody. And particularly Supervisor Melgar for taking
9 an important point of the discussion right into the
10 center of where we are with this project.

11 This project is quite large, it's a unique one,
12 once-in-a-lifetime opportunity to reconsider a major
13 public open space to have relevant -- relevance to what
14 our citizens need.

15 I'm in full support to thoroughly examine the
16 PRC and the SI rowing clubs in the context of the larger
17 lake becoming an expanded resource for rowing.

18 These comments very much echo what I
19 experienced when doing the Treasure Island EIR, most
20 recently with protecting and expanding public access for
21 city use to the water. In that particular case sailing,
22 canoeing and windsurfing.

23 We also had, last week, in the review of the
24 Waterfront Plan requests for considering the South End
25 and the Dolphin Rowing and Swimming with respect to use

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1 of water.

2 So thank you commissioner -- Supervisor Melgar
3 for your comments and putting them right up front on
4 this.

5 My second group of comments is in appreciation
6 of historic preservation and the incredible comments they
7 did in a letter that we were copied on this morning.

8 Most, and foremost, I want to support and add
9 the reviews the cultural lens into our group of
10 responses. The fact that Ohone are indeed the original
11 historic occupants of this land has not been sufficiently
12 treated in the EIR. And historic preservation to expand
13 on the objectives and acknowledging and interpreting the
14 site's history with respect to that particular element is
15 extremely important and I would hope that all of us
16 embrace that particular thought.

17 Going from there, I saw the comments on full,
18 partial, preservation alternatives and no-project
19 alternative.

20 I don't want to get into detail, but let the
21 EIR sort out how we can minimize impact and maximize
22 nondisruptive uses -- reuses of the site.

23 And with that, I want to go through quickly
24 through a number of points that I've heard made over the
25 past three or six months, particularly with project

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1 impact on not just the site at all -- on the site as it
2 is, but on the context in which the site occurs and that
3 is Lake Merced at large.

4 There's habitat impact not just on the site,
5 but habitat is indeed a matter of looking at the lake as
6 one.

7 How does the project serve social equity?

8 I think the remote location of the site makes
9 it difficult for the city at large to come here. There's
10 hardly any public transportation.

11 However, only expecting that people would come
12 here by car creates a burden that I think we need to
13 seriously consider.

14 We all know that the need of open space in this
15 particular form has increased and come into a stronger
16 focus through COVID and the ability of people not having
17 their own open spaces. So finding access and
18 accessibility to this newly potential open -- open space
19 I think is something that the EIR should seriously
20 consider.

21 There are concerns about the commercialization
22 of the site, including that Rec and Park seems to hint
23 that this can only happen if they find a concessionaire.

24 That concerns me because there is concern that
25 the facilities at the restaurant and the numbers of

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1 people that are expected at this site make it too much of
2 enterprise that can only be supported by certain segments
3 of the population, but not by everybody. I would like to
4 really see a closer analysis of what is really expected,
5 even cost data of what is required to make the survival
6 and successful enterprise.

7 And I would like to actually deemphasize the
8 entrepreneurial part of this open space, but rather the
9 open space opportunities involved. Those would be impact
10 recreational opportunities that do not require a large
11 restaurant to make it happen.

12 One ask I have about EIR is I found it more
13 difficult to read through the alternatives without having
14 the pictures which describe them right next to them.

15 In other EIRs, we have mostly a matrix that at
16 the top shows in small vignette form what the alternative
17 is and then in column form the summary of impact and
18 mitigation measures.

19 In this particular case, we have things very
20 much strung together and you have to go back and forth in
21 order to get to the imagery which explains which
22 alternative you're exactly looking at.

23 And since the differences between these
24 alternatives are more for the informed user of the site
25 rather than those who read this for the first time, it

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1 gets kind of more difficult to get into the subtleties of
2 what the impacts are and what the mitigation measures are
3 that are accompanying them.

4 I spoke about access and car parking. In the
5 absence of public transportation, are there remote
6 parking lots from which people then could take their bike
7 or shuttle? I have not seen a transportation analysis of
8 this kind and would like to have more answers.

9 The document is rather large and I may not have
10 looked at everything. But those are, I think, in
11 summary, the points that I would like to add to this
12 discussion.

13 Thank you.

14 PRESIDENT TANNER: Thank you.

15 Commissioner Koppel.

A-KOPPEL

16 COMMISSIONER KOPPEL: Thank you, Supervisor
17 Melgar, for coming by in person. It's great to see you.

18 Growing up in Park Merced and also attending
19 Lowell High School, I know the area very well.

20 And for those of you who don't know, there's a
21 big lake in the very southwest corner of the city. A
22 really big one.

23 Not only have we hosted major golf
24 championships, like the PGA championships at the public
25 Harding golf course, but I'm thrilled to see this very

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1 underutilized section of the lake brought to where it
2 should be.

3 There's not as many things to do in that part
4 of town as you might think, and so just something as
5 minor as this is going to do such a huge improvement for
6 the neighborhood. And it just brings a lot of color to a
7 part of town that just was sometimes a little more gray.

8 So thrilled to see where we're at. And I'm
9 very confident that we'll get to the right landing spot
10 eventually thanks to the supervisor's work.

11 PRESIDENT TANNER: Commissioner Imperial.

12 COMMISSIONER IMPERIAL: Thank you, Supervisor
13 Melgar, for coming here and also for the rowing community
14 that also came in here.

15 Actually eight years ago I was trying to find a
16 place to row or a club to row. And I was trying to look
17 for a dragon boat team. The one thing I could find was
18 in Oakland and in South San Francisco.

19 So I ended up joining a dragon boat team in
20 South San Francisco and ended up quitting because it just
21 took a lot of my time.

22 Dragon boat and rowing takes a lot of your time
23 and, you know, I'm working out, by the way. Takes
24 about -- I believe you have to practice three times a
25 week for that.

1 And by that time, too, I got to see the kind of
2 facility that we had in South San Francisco. And to hear
3 that this facility is 3,000 square feet, it's not enough
4 because the boats are actually longer and then there's
5 also -- also some of the storage for the equipments need
6 to be there.

7 So I do support of having a bigger facility for
8 rowing community because that is what's actually needed,
9 I think, in San Francisco because we don't have that much
10 recreational activities around here. And if there are,
11 they're pretty expensive in terms of membership.

12 So, I'm excited to see that a community
13 facility is going to be improved in this area.

14 And I have also in my free time have hiked
15 around Lake Merced. It's a really beautiful area and
16 underutilized at the same time.

17 I do have also -- in terms of the EIR and
18 how -- the kind of analysis that has been done in terms
19 of the biological resources and how the biologist can be
20 part of this during the construction time, I mean I think
21 there are some good mitigation measures are being done
22 here.

23 However, I do also want to emphasize in terms
24 of the usage of these -- of this what's being proposed in
25 front of us, because I do want to highlight in terms of

1 this open space of how it's going to be used for public
2 open space and the recreational activities, rather than
3 the restaurant.

4 And that's something that I feel like that
5 perhaps can be included in the comment here is the effect
6 of the habitable -- habitable effect of the restaurant,
7 especially if there's going to be 500 type kind of
8 seating in this area. How is that going to impact of the
9 biological resource around here?

10 And if we're going to also -- I would echo
11 Commissioner Moore in her comment around the
12 racial-social equity in terms of accessing this area. I
13 think we really need to emphasize as well the public
14 transportation access and other form of transportation
15 aside from cars.

16 So in this, for me, I would emphasize on the
17 open space and recreational use of this area than the
18 restaurant use. Thank you.

19 PRESIDENT TANNER: Thank you.

20 Commissioner Diamond.

A-DIAMOND

21 COMMISSIONER DIAMOND: Thank you. I too want
22 to thank Supervisor Melgar. Nice to see you in front of
23 your old commission.

24 Two sets of comments. First is, as I
25 understand Section 283 of the EIR, our only input with

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1 respect to this project is to review and certify the EIR.
2 We have no input on the actual decision as to what is
3 built.

4 That being said, especially in light of the
5 comments that we heard today, I feel like it's important
6 to ensure that in the response to comments, that staff
7 take all the steps that are necessary to address impacts
8 that would come from a larger boat facility so that if
9 the decision makers ultimately do go along with the
10 wishes of the rowing club, that they're not held up by
11 having to redo any CEQA documents. That this CEQA
12 document should be broad enough, explicitly broad enough,
13 to cover that solution if that's where the ultimate
14 decision makers decide to land.

15 I also, on a separate note, want to say even
16 though we don't get to approve the project, we just
17 certify the EIR, that I'm extremely excited about this
18 project. It opens up an incredible resource to a much
19 broader swath of the community. It's a very, very
20 intense use of the site in the sense that it allows for
21 multiple uses.

22 And I appreciate that the project designers are
23 trying to ensure that this facility appeal to as many
24 people as possible. And that strikes me as particularly
25 important as we embark on an effort, you know, as we're

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1 seeing with the housing element to increase density,
2 probably on the west side, that we need to make sure that
3 we have increased recreational facilities as well too.

4 So, I am very excited to see this project come
5 to fruition.

6 So thank you.

7 SECRETARY IONIN: Thank you, Commissioner
8 Diamond.

9 Supervisor Moore had come up again.

A-MOORE

10 COMMISSIONER MOORE: I had forgotten to mention
11 something which I have injected into all discussions
12 about night light use and recreational open spaces near
13 the coast. That we are very mindful of not adding night
14 lighting and distracting from migratory birds in this
15 area.

16 The view of the city at night should be less
17 illuminated in this part of the city and basically
18 reflect the open space that it really represents.

19 So I would like to put this to record as it
20 deals with the restaurant and night use and excessive
21 lighting.

22 PRESIDENT TANNER: I will add my voice to
23 support that comment, thinking about the directionality
24 and intensity of lighting for the park at night.

25 I don't see any other hands from other

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1 commissioners.

2 So I think that we are ready to conclude this
3 matter. I just want to offer again our thanks to the
4 Supervisor and all those who called in or came into City
5 Hall. We appreciate you being here with us today.

6 SECRETARY IONIN: Great. Thank you.

7 ...

8 (Discussion regarding Item 10 concluded.)

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1 State of California)
2) ss.
3 County of Alameda)
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6 I, Connie J. Parchman, CSR #6137, do hereby
7 certify: That I am a certified shorthand reporter of the
8 State of California; that I was provided access to audio
9 files; that a verbatim record of the proceedings was made
10 by me using machine shorthand which was thereafter
11 transcribed under my direction; further, that the
12 foregoing is an accurate transcription thereof.

13
14 I further certify that I am neither financially
15 interested in the action nor a relative or employee of
16 any attorney or any of the parties.

17
18 IN WITNESS WHEREOF, I have subscribed my
19 name.

20
21 April 13, 2022

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23 
24 _____

25 Connie J. Parchman, CSR #6137

APPENDIX J

PROJECT VARIANT DOCUMENTATION

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J1 TRANSPORTATION ANALYSIS MEMO –
LARGER BOATHOUSE VARIANT



Date: October 25, 2022
To: Lake Merced West Project, Planning Department File No. 2019-014146ENV
From: Ryan Shum, Transportation Planner
Re: Transportation Analysis Memo – Project Variant

Purpose

This memo presents transportation impact analysis in support of the Lake Merced West project variant environmental analysis. Topics covered in this memo include travel demand and modal split, peak hour freight and passenger loading demand, and vehicle miles traveled (VMT) and induced automobile travel. Other transportation topics were screened out of further analysis, and a discussion of that determination is discussed herein. This memo was prepared in accordance with the San Francisco Planning Department's San Francisco Transportation Impact Analysis Guidelines.¹

Project Description

The proposed Lake Merced West project would redevelop approximately 11 acres on the southwest side of Lake Merced, which is property of the San Francisco Public Utilities Commission. The project site is the location of the old Pacific Rod and Gun Club and currently developed with four skeet fields, five main buildings, three smaller buildings, and a paved parking area.

The proposed project is the construction and operation of the Lake Merced West recreation center, which would offer a wide array of recreational activities open to the public, such as trail use, picnicking, paddleboarding, kayaking, fishing, fitness activities, a ropes course, bird watching, space for outdoor exercise, skateboarding, multi-use courts for basketball and other activities, as well as restaurant dining, and indoor space for gatherings such as community meetings and birthday parties. The facility would include areas that could be used flexibly for a wide variety of uses such as picnics and larger gatherings; as well as areas designated for programmed activities.

The existing buildings on the project site would be demolished. A new community building and restaurant would be built near the center of the site. A new boathouse building is also proposed at the southeastern end of the site. Upon completion of construction, the project site would include the following buildings and uses:

- Community Building (3,500 sf) – community group meetings, birthday parties, recreational activities, and administrative offices
- Restaurant (5,000 sf) and associated outdoor dining area – Restaurant capacity for 150 people inside and 70 people outside on the patio for a total of approximately 220 people.

¹ San Francisco Planning Department. *Transportation Impact Analysis Guidelines for Environmental Review*. February 2019 (updated October 2019). Available at: <https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines>

- Restrooms and Storage (1,000 sf)
- SFPUC Arborist Office (3,800 sf) and Yard – one office and four to six work stations, a locker room, four employee parking spaces, covered parking for three trucks and associated equipment, a bucket truck, a wood chipper, a stump grinder, a mini skid steer loader, and one dump trailer.
- Boathouse (15,000 sf) – the proposed boathouse (Lake Merced West boathouse) would supplement the existing Lake Merced boathouse at 1 Harding Road.² Approximately 3,000 square feet of the new boathouse would be used for rental watersports equipment storage, a rental kiosk, associated administrative space, and public restrooms. The remaining 12,000 square feet would be used to store approximately 42 boats used by the Pacific Rowing and St. Ignatius rowing clubs. These 42 boats would be moved from the existing boathouse to the new boathouse. The new Lake Merced West boathouse would be used by approximately 129 varsity rowers each weekday and approximately 69 varsity rowers each Saturday. No varsity users would typically use the boathouse on Sundays. These users would commute to the new boathouse from school either by foot or carpooling. Refer to Attachment 1 for additional information.

Project operation would employ an estimated 15 to 20 full time equivalent employees. These staff would be employed by a concessionaire and would be drawn from the local and regional work force. No changes to city agency staffing levels are anticipated during project operations and maintenance; site oversight and maintenance would be performed by existing city employees. The SFPUC arborist team, approximately 6 existing employees, would operate an office at the project site and store equipment and vehicles at the yard. Typically, the arborist office and yard would operate between 6:30 a.m. to 3:00 p.m. Monday through Friday. As discussed above, a separate entrance driveway from John Muir Boulevard would provide access to the arborist office and yard. Arborists would be dispatched from the facility to perform work at sites across the city.

Access, Parking, and Loading

Public access to the site would be permitted during operating hours. Pedestrian and vehicle access would be provided via John Muir Drive. There would be three pedestrian access points and two vehicle access points on John Muir Drive (see Site Plan in Attachment 1). The northern pedestrian access points would lead to the ropes course, skate park, and northern portion of the project site. The two southern pedestrian access points would provide lead to the meadow multi-use lawn, boathouse, and arborist facility in the southern portion of the site. The northern vehicular entry and exit would provide access to the main parking lot, which would be approximately 27,100 square feet and would have approximately 80 stalls, including Americans with Disabilities Act-compliant stalls. The northern vehicular entry and exit driveway would be approximately 30 feet wide and to the west of the existing driveway; the existing driveway on John Muir Drive would be removed. The second vehicular driveway would be located to the south and would provide access to the loading/drop-off zone and parking area for the new Lake Merced West boathouse and arborist facility.

Bicycle racks would be located at various locations across the site to accommodate 30 bicycles. If bicycle parking demand increases, additional bicycle racks could be installed in other areas of the site.

² For more information on the existing Lake Merced Boathouse, see Attachment 1 of this memo.

The recreation facility would operate during daylight hours, and the restaurant would be open through dinner. The main site gate would be closed when the restaurant closes, restricting access to the site during non-operating hours. The restaurant would require regular freight deliveries, averaging two deliveries each.

Special Events

In addition to regular programming and site uses, up to 12 special events with approximately 500 visitors per event could be held each year. These events would be coordinated with the Recreation and Park Department and other city agencies, such as the San Francisco Municipal Transportation Agency (SFMTA), as needed. No street closures are anticipated for these special events. In the event that a street closure is proposed, the proposal will be reviewed by the SFMTA and the Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT). ISCOTT review would ensure that the proposed event would not hinder public transit operations in the area, and that adequate roadway safety measures are implemented, if needed. If an event cannot meet the aforementioned requirements, the street closure permit will be denied.

The proposed Lake Merced West boathouse would not host boating events and rowing club meets would continue to be hosted at the existing Lake Merced boathouse at 1 Harding Road. Some boating event attendees may watch boating events from the new Lake Merced West recreational area, including the proposed boathouse. Organizers of special events at the existing Lake Merced boathouse, including rowing meet organizers, would continue to be required to obtain necessary permits, provide volunteers to manage parking, and pay for two park rangers to be on-site for the duration of the event.

Transportation Setting

The project site is bounded by Lake Merced to the north and east, and John Muir Drive to the west and south. John Muir Drive provides the primary transportation access point to the site. The project site is the former site of the Pacific Rod and Gun Club and consists of four skeet fields, a paved area for vehicles, and abandoned structures; the project site is currently being used for construction staging and equipment storage by the SFPUC's Sewer System Improvement Project and arborist team. The south side of John Muir Drive across from the project site contains residential uses. There are currently no passenger or freight loading zones on John Muir Drive in the project vicinity.

John Muir Drive in the project vicinity is a two-lane roadway (one lane in each direction) with a class II bikeway³ in each direction. Near the project site, there is also street parking on both sides of John Muir Drive and a pedestrian sidewalk on both sides of the roadway. The project site is served by the 57-Park Merced Muni bus route, which has four bus stops in the project vicinity (two stops on each side of the road serving the inbound and outbound directions respectively). Under normal operations, the 57-Park Merced arrives approximately every 20 minutes.⁴ At the time of writing (April 2021), Muni is operating a core service plan in response to COVID-19 emergency conditions. As a result, the 57-Park Merced route has temporarily been suspended.

³ Class II bicycle lanes are located on-street but separated from vehicle traffic.

⁴ At the time of publication, the 57-ParkMerced route is suspended due to the city-wide shelter-in-place. However, it is expected that the route would resume regular service once shelter-in-place is lifted.

In the project vicinity, the Lake Merced Boathouse located at 1 Harding Road supports five rowing clubs that use Lake Merced for boating activities. The boathouse is primarily used as a storage facility for boats and exercise equipment, and also hosts special events and meets throughout the year. An estimated 1,000 people attend each rowing meet at Lake Merced. For more information about the existing Lake Merced Boathouse, see Attachment 1 of this memo.

Travel Demand

Lake Merced is a popular recreational area for nearby city residents and members of the public. The project site is currently closed and unused; however, the surrounding Lake Merced recreational area is open and well-used. The project proposes to redevelop this unused portion of Lake Merced with a wide array of recreational activities open to the public, such as trail use, picnicking, paddleboarding, kayaking, fishing, fitness activities, a ropes course, bird watching, space for outdoor exercise, skateboarding, multi-use courts for basketball and other activities, as well as restaurant dining, and indoor space for gatherings such as community meetings and birthday parties. With project implementation, Lake Merced would attract users from a wider geographic area of the city. In this sense, the proposed project represents greater utilization of an existing use. Accordingly, the following travel demand analysis estimates the number of new trips that would result from new users of the site.

Weekday Trip Generation

Net new weekday trips for the proposed project were estimated using the weekday trip generation rate derived from the *Institute of Transportation Engineers (ITE), 9th Edition Trip Generation* and with trip data from the Recreation and Parks Department (Attachment 1). The ITE trip generation rate is consistent with the type and uses expected of the proposed project and is consistent with the rate used for other recreational open space projects in San Francisco. Based on a daily trip rate of 24.3, the proposed open space recreational uses would generate approximately 268 net new daily person trips, with 70 of those trips occurring during the PM peak hour. The proposed restaurant use on-site would conservatively generate approximately 1,000 daily person trips, with 135 of those trips occurring during the peak PM hour. In total, the proposed project would generate approximately 205 net new PM peak hour person trips. However, the project’s trip generation will be constrained in part by the number of parking spaces available in the proposed project, as further described in the Weekend Trip Generation section below. Table 1 below shows the number of net new weekday daily person trips that would be anticipated from the proposed project.

Land Use	Project Size	Daily Trip Rate ¹	Daily Person Trips	PM Peak Hour Trips ^{2,3,4}
Open Space	11 acres	24.3 trips per acre	268	70
Restaurant	5,000 sf	200 trips per ksf	1,000	135
Boathouse	15,000 sf	See Attachment 1	129	67
<i>Total</i>			<i>1,397</i>	<i>272</i>

¹ Fehr & Peers. *Indian Basin Development – Transportation Impact Study*. August 2017.
² PM peak hour trips for open space uses is assumed to be 25.9% of total daily trips

<p>³ PM peak hour trips for restaurant uses is assumed to be 13.5% of total daily trips</p> <p>⁴ Fehr & Peers. <i>Indian Basin Development – Transportation Impact Study</i>.</p> <p>⁵ ksf = thousand square feet</p>
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Weekend Trip Generation

Weekend trips are generally more spread throughout the day in comparison to weekday trips, which are more concentrated during the AM and PM peak periods. As previously discussed, the proposed project would attract new users to the site and accordingly generate new trips to the site. These new trips would contribute to existing trips from existing recreational users of Lake Merced.

To estimate the total number of net new weekend trips, the Planning Department (department) based the methodology on the proposed uses of the site, availability of parking, and limited transit access in the project vicinity, and conservatively assumed that the majority of new users would drive to the site.⁵ As such, the department assumed that automobile vehicle trips would constitute the majority of net new person trips to the site, as further explained in the “Modal Split” section below. Thus, to estimate the number of net new weekend vehicle trips, the department conservatively assumed that the proposed project would generate one trip per on-site parking space with an average parking space turnover rate of two hours (i.e., each vehicle would be parked for two hours). Assuming typical daylight operating hours of 8:00 AM to 6:00 PM and given that there are approximately 80 parking spaces in the proposed parking lot, the proposed project is estimated to generate approximately 800 vehicle trips throughout the day on a typical weekend day (400 inbound trips and 400 outbound trips).

The number of total net new daily weekend trips was estimated using the modal split of a representative recreational use, based on the total number of net new weekend vehicle trips per day.⁶ In other words, the methodology applied the representational modal split to the 800 estimated net new vehicle trips to extrapolate the number of net new trips by walking, bicycling, and transit (see Table 3). Additionally, the proposed Lake Merced West boathouse would generate approximately 69 person trips on Saturdays, which equates to approximately 40 vehicle trips based on average vehicle occupancy rates and carpooling.^{7,8} In total, the proposed project would generate approximately 1,032 net new daily weekend person trips across various ways people travel. The modal split of the proposed project is further described below.

Special Events

Annually, the proposed project may host up to 12 special events with approximately 500 visitors. Based on the anticipated number of visitors and previously described modal split for the project, these special events would generate approximately 1,000 trips (one inbound and one outbound trip per attendee)

⁵ Weekend trip generation rates for open space uses are not available in the ITE trip generation rates.

⁶ CHS Consulting Group. *Ocean Beach Climate Change Adaptation Project – Traffic Operations Analysis*. Table 10. March 12, 2021

⁷ ESA. Memorandum: *Lake Merced West: Existing Boathouse Operations and Proposed Larger Boathouse Operations*. May 26, 2022

⁸ The average number of vehicle trips was calculated using the average vehicle occupancy rate for the land use type (retail) and location of the project site within the city (Place Type 3) that is consistent with the city’s TIA Guidelines.

consisting of: 830 private vehicle trips, 80 TNC/taxi trips, 70 transit trips, and 20 walking trips. The same modal split for weekdays and weekends was applied to special events to provide a conservative estimate of vehicle trips associated with special events.

As previously discussed, the proposed Lake Merced West boathouse would not host boating events and rowing club meets would continue to be hosted at the existing Lake Merced boathouse at 1 Harding Road.

Ways People Travel (Modal Split)

The project-generated person-trips were assigned to different ways people travel to determine the number of automobile, transit, walking, biking, and other trips. Note that these trips represent new trips made by new users that would be accessing the project site. Existing users of the Lake Merced area would also continue to access the area, as well as the project site; however, for a conservative analysis these trips are not captured in the trip numbers below. Weekday and weekend trips by mode are shown in Table 2 and Table 3 below respectively. Given the recreational uses proposed for the project site, the department expects that people would travel to the project site the same way on weekdays and weekends and thus the same modal split was applied to both weekday and weekend trips.

As shown in Table 2, approximately 1,117 person trips would occur by vehicle, which equates to approximately 654 vehicle trips.⁹ Additionally, 102 person trips would occur by transportation network company (TNC) or taxi, 89 person trips by public transit, and 89 person trips by walking would occur on a typical weekday.

As shown in Table 3, approximately 869 private vehicle trips, 77 TNC or taxi trips, 67 public transit, and 19 walking trips would occur on a typical Saturday or Sunday.

The number of new users who would bike to the project site is estimated to be a negligible amount. New users are more likely to travel to the site using automobiles, TNCs/taxis, public transit, or by walking and people who currently bike to Lake Merced would likely continue to bike.

⁹ *Ibid.*

Table 2 – Weekday Modal Split

Mode Choice	Total Net New Person Trips							
	Open Space		Restaurant		% of Trips ⁴	Boathouse		%of Trips ^{5,6}
	Daily Trips	Estimated PM Peak Trips ^{1,3}	Daily Trips	Estimated PM Peak Trips ^{2,3}		Daily Trips	Estimated PM Peak Trips ⁵	
Automobile	222	58	830	112	83%	65	34	50%
TNC / Taxi	22	6	80	11	8%	0	0	0%
Muni Bus / Rail	19	5	70	9	7%	0	0	0%
Walking	5	1	20	3	2%	64	33	50%
Bicycle	0	0	0	0	0%	0	0	0%
Other	0	0	0	0	0%	0	0	0%
Total	268	70	1,000	135	100%	129	67	100%

¹ PM Peak trips for open space uses are estimated to comprise of 25.9% of total daily trips

² PM peak hour trips for restaurant uses is assumed to be 13.5% of total daily trips

³ Fehr & Peers. *India Basin Development – Transportation Impact Study*. August 2017.

⁴ CHS Consulting Group. *Ocean Beach Climate Change Adaptation Project – Traffic Operations Analysis*. Table 10. March 12, 2021.

⁵ ESA. Memorandum: *Lake Merced West: Existing Boathouse Operations and Proposed Larger Boathouse Operations*. May 26, 2022

⁶ Assumes even split between vehicular carpools and running/walking from the nearby school

Table 3 – Weekend Modal Split

Mode Choice	Total Net New Trips	Percentage of Trips ¹
Automobile	800	83%
Automobile (boathouse)	69	
TNC / Taxi	77	8%
Muni Bus / Rail	67	7%
Walking	19	2%
Bicycle	0	0%
Other	0	0%
Total	1,032	100%

¹ CHS Consulting Group. *Ocean Beach Climate Change Adaptation Project – Traffic Operations Analysis*. Table 10. March 12, 2021. *South Ocean Beach Coast Protection Project – Existing Area Traffic Operations Evaluation (Draft)*. July 26, 2019.

Table 4 presents the ways people would be expected to travel to the project site during special events.

Mode Choice	Total Net New Trips	Percentage of Trips¹
Automobile	830	83%
TNC / Taxi	80	8%
Muni Bus / Rail	70	7%
Walking	20	2%
Bicycle	0	0%
Other	0	0%
<i>Total</i>	1,000	100%

¹ CHS Consulting Group. *Ocean Beach Climate Change Adaptation Project – Traffic Operations Analysis*. Table 10. March 12, 2021.

Passenger and Freight Loading Demand

Period of Analysis	Passenger Loading Demand¹	Peak 15 Minute Spaces of Loading Demand²	Rounded 15 minutes of PM Peak Hour Spaces of Loading Demand
Weekday (PM Peak Hour)	26	0.87	1
Weekend (Daily)	67	2.2	3
Special Events	80	2.66	3

¹ The passenger loading analysis assumes all TNC/Taxi trips would require use of passenger loading spaces. Passenger loading demand for the proposed boathouse is not included in this estimate since the boathouse is located in a separate portion of the project site with a dedicated loading area.

² The methodology of calculating peak 15-minute loading demand is provided on page F-12 of the San Francisco Transportation Impact Analysis Guidelines.

Transportation Impact Analysis

Significance Criteria

The proposed project’s transportation-related impacts were analyzed per the following significance criteria:

Construction

Construction of the project would have a significant effect on the environment if it requires a substantial extended duration or intense activity that could create potentially hazardous conditions for people walking, bicycling, driving, or riding public transit; or interfere with emergency access or accessibility for people walking or bicycling; or substantially delay public transit.

Operation

Operation of the project would have a significant effect if it would:

- Create potentially hazardous conditions for people walking, bicycling, or driving or public transit operations.
- Interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access.
- Substantially delay public transit.
- Cause substantial additional VMT or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network.
- Result in a loading deficit and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit.
- Result in a substantial vehicular parking deficit and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or interfere with accessibility for people walking or bicycling or inadequate access for emergency vehicles; or substantially delay public transit.

Scoped Out Topics

Detailed analysis of construction (existing plus project), emergency access, bicycle and walking accessibility, public transit impacts were not required for the proposed project. The following section summarizes the approach and the findings by topic.

Construction

Construction of the proposed project would occur in four phases:

- Phase 1 – Building and Structure Demolition;
- Phase 2 – Final Soil Remediation;
- Phase 3 – New Building Construction; and
- Phase 4 – Shoreline Recreational Facilities Construction.

Phase 1 would generate approximate 2,200 cubic yards of debris, 280 one-way haul truck trips, and last approximately 6 to 8 months. Phase 2 would generate approximately 3,000 cubic yards of debris and excavated contaminated soil, 380 one-way haul truck trips, and last approximately 20 days. Phase 3 would generate approximately 7,000 cubic yards of soil and import building materials, approximately 3,000 haul truck trips, and last approximately 18 to 24 months. Phase 4 would generate approximately 300 cubic yards of excavated sediment and import building materials for the boathouse and dock (80 one-way haul trips), and last about 6 months. Each phase would have a maximum of 30 truck trips per day. In total, the project would move less than 20,000 cubic yards of materials, which is less than the construction screening criterion for project construction impacts. Furthermore, the project site does not include any transportation facilities that would require relocation or closure during construction. For these reasons, the transportation-related construction impacts of the proposed project would be less than significant.

Emergency Access

The proposed project would continue to provide adequate emergency access to the project site and does not include any changes to John Muir Street that could affect emergency vehicle access to the surrounding area. Therefore, existing plus project and cumulative emergency access impacts would be less than significant.

Bicycle and Walking Accessibility

The proposed project would not make changes to the existing sidewalks or bicycle lane on John Muir Drive. The proposed project would not include design features that would impede access to the project site or adjoining areas for people walking or bicycling. Therefore, existing plus project and cumulative bicycle and walking accessibility impacts would be less than significant.

Public Transit

Although the proposed project would increase the number of vehicle trips traveling to and from the project site, the project would not increase vehicle trips during the PM peak period to the extent that nearby public transit could be affected. This is because the proposed project would generate fewer than 300 vehicle trips during the PM peak hour, which per the department's guidelines indicates it would not result in substantial public transit delay. The project also does not propose any changes to John Muir Drive and would not affect existing bus facilities on John Muir Drive. Therefore, existing plus project and cumulative public transit impacts would be less than significant.

Vehicular Parking

In accordance with CEQA section 21099, aesthetics and vehicular parking shall not be considered in determining if a project has the potential to result in significant environmental effects if the project meets the screening eligibility criteria under CEQA section 21099(d)(1). The department evaluated the project's eligibility under CEQA section 21099(d)(1) and determined the project does not meet the screening eligibility criteria, and therefore an aesthetics analysis and secondary parking analysis may be required.

The San Francisco Transportation Impact Analysis Guidelines for Environmental Review establishes screening criteria to determine whether a project could result in secondary impacts due a substantial vehicular parking deficit. If a project is located within the department's map-based screening area,¹⁰ then a substantial vehicular parking deficit would not occur and a vehicular parking analysis is not required. The project site is located in TAZ 401. Retail is presented as a proxy for the proposed project's recreational uses for map-based screening.¹¹ For TAZ 401, existing daily VMT per capita is 26 percent below the regional average daily VMT per capita and projected 2040 daily VMT per capita is 15 percent below the 2040 regional average daily VMT per capita. Because the project is within a map-based screening area, a secondary parking analysis is not required.

¹⁰ Map-based screening is used to determine if a project site is located within a transportation analysis zone that exhibits low levels of VMT.

¹¹ Trips associated with recreational uses typically function similarly to retail. Therefore, these types of land uses are treated as retail for screening and analysis.

For these reasons, it was determined that the proposed project would result in a less than significant project-level and cumulative impacts associated with vehicular parking and a more detailed parking analysis is not required (see attachment).¹²

Existing Plus Project Conditions

Freight and Passenger Loading

The following analysis first discusses freight and passenger loading impacts for the primary recreational area, which includes the community building, restaurant, and all recreational facilities except for the proposed boathouse. Freight and passenger loading impacts for the proposed boathouse are discussed further below. As shown above, the proposed project would generate approximately 102 daily weekday TNC/taxi trips, 26 of which would occur during the PM peak hour. In addition, the project would generate approximately 77 weekend TNC/taxi trips. The proposed project includes two off-street passenger loading areas in the main parking lot, one at the western ends by the rope course, and one near the restaurant. The analysis assumes that all TNC and taxi trips to and from the project site would be passenger loading trips. As shown in Table 5, during any given minute of the peak hour throughout the average peak period of passenger loading activity the proposed project would generate a passenger loading demand for one passenger loading space during the weekday and three spaces during the weekend. Based on the number of anticipated TNC and taxi trips during any given minute of the peak 15 minutes of the average peak period of passenger loading activity and the number of vehicles that the off-street loading zones would be able to accommodate, the proposed project would accommodate its passenger loading demand during the weekday but result in a deficit of one passenger loading space on the weekend.

Any passenger loading demand that is not accommodated by the two designated loading areas on the weekend is not anticipated to result in secondary impacts. There is adequate space for vehicles to use the vehicular parking area to quickly pick up and drop of passengers within the primary parking lot (i.e., not on John Muir Drive) without queuing on the driveway and obstructing the sidewalk or bicycle facilities. For the same reasons, passenger loading activity is not anticipated to occur in travel lanes. Therefore, passenger loading activity would not result in hazardous conditions for people walking, bicycling, or driving, or substantial transit delay, and passenger loading impacts would be less than significant.

Freight loading for the restaurant would be located on the eastern end of the main parking area. The proposed restaurant is anticipated to require an average of two deliveries per week. Other facilities would require intermittent truck deliveries on an as needed basis. Open space and recreational uses typically do not generate substantial freight loading demand. Due to the low commercial loading demand of the proposed project, the designated loading area would be able to accommodate project freight deliveries.

The proposed boathouse would have a separate and dedicated loading zone and short-term parking to facilitate passenger loading. As discussed in Table 2, the proposed boathouse would generate approximately 65 daily vehicle trips, 34 of which would occur during the PM peak hour. Due to the lack of parking available in the boathouse area, this analysis assumes that all vehicle trips to the proposed boathouse would drop off and pick up passengers using the dedicated loading zone fronting the boathouse. The proposed boathouse is anticipated to include at least three loading zones which can be

¹² San Francisco Planning Department. *Eligibility Checklist: CEQA Section 21099 Modernization of Transportation Analysis – Lake Merced West Project*. October 18, 2021.

used for freight and passenger loading. Given the number of loading spaces and size of the roundabout area, all freight and passenger loading activity would be adequately accommodated within the loading area and would not result in a vehicle queue that could extend into John Muir Drive. Therefore, loading activity for the proposed boathouse would not result in hazardous conditions for people walking, bicycling, or driving, or substantial transit delay, and passenger loading impacts would be less than significant. For these reasons, the project would result in a less than significant loading impact.

Potentially Hazardous Conditions, Accessibility, Substantial Public Transit Delay, and Freight and Passenger Loading During Special Events

In addition to regular programming and site uses, up to 12 events with approximately 500 visitors per event could be held each year. Based on the anticipated number of visitors and previously described modal split for the project, these special events would generate approximately 1,000 trips consisting of: 830 vehicle trips, 80 TNC and taxi trips, 70 transit trips, and 20 walking trips. During special events, the approximately 80 TNC and taxi trips would generate a peak 15-minute period loading demand of approximately 3 spaces (see Table 5). However, as previously discussed, the project's trip generation will be constrained in part by the number of parking spaces available in the proposed project, as further described in the Weekend Trip Generation section below.

Since special events are limited to 500 attendees and all loading activities would occur in the parking lot, there would not be a significant impact on vehicle traffic flow on John Muir Drive. Events that may require partial or full street closure of John Muir Drive would be subject to the SFMTA ISCOTT process. ISCOTT review would ensure that the proposed event would not significantly impact public transit operations in the area, that adequate access is provided to the project site, and that adequate roadway safety measures are implemented, if needed. If an event cannot meet the aforementioned requirements, the street closure permit will be denied. Site access would therefore not be substantially affected. Thus, special events would not impede emergency vehicle access in the project area, nor significantly delay transit, nor cause substantial vehicle queues to the extent that the project could cause hazardous conditions for bikers and pedestrians.

With regards to commercial loading during special events, freight loading would occur outside of event operating hours and would not conflict with the peak passenger loading hours. Portions of the proposed parking lot may also be appropriated for event-related freight loading during special events. The proposed project would therefore have a less than significant loading impact during special events.

Due to the infrequent nature of these events (up to 12 per year), these special events would not result in significant site accessibility or public transit delay impacts, nor create potentially hazardous conditions from unmet passenger and freight loading demand on the site.

Vehicle Miles Traveled and Induced Automobile Travel

A project would have a significant transportation impact on the environment if it would cause substantial additional vehicle miles travelled (VMT) or substantially induce automobile travel. To help determine whether a project would result in substantial VMT, the Department uses the map-based screening tool. If a project is located within a Transportation Analysis Zone that exhibits low levels of VMT, then it is presumed that VMT impacts would be less than significant and a detailed VMT analysis is not required. According to the map-based screening tool and using retail as a proxy for recreational land uses and for the restaurant

use, the project site is determined to be in an area where the project would not result in significant VMT impacts.¹³ The project's potential to induce automobile travel is discussed below.

The intent of SB 743 is to provide "alternative criteria to 'promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.'"¹⁴ The proposed project meets this intent by improving the Lake Merced recreational area and increasing the amount of open space available in the city. Furthermore, as described in the Scoped-Out Topics section, the proposed project would not exceed the screening criteria for a detailed parking analysis.

Cumulative Conditions

Cumulative impacts occur when a project in the vicinity of the proposed project combines to result in greater impacts than either project individually. Within the Lake Merced project area, there are several future development projects that could combine with the proposed project to result in cumulative impacts:

The Ocean Beach Long-Term Improvements Project

The Ocean Beach Long-Term Improvements Project is a climate change adaptation and sea level resiliency project to improve the portion of Ocean Beach from Sloat Boulevard to Fort Funston known as South Ocean Beach. The project would address shoreline erosion, severe coastal storm and wave hazards, and sea level rise which threaten city infrastructure, coastal access and recreational facilities, and public safety. Major project components include: (1) permanent closure of the Great Highway between Sloat and Skyline boulevards, and reconfiguration of affected intersections and San Francisco Zoo entrances; (2) removal of pavement, rock and sandbag revetments, rubble, and debris, and recontouring and revegetation of the beach and bluff; (3) construction of a new service road and multi-use trail, beach access stairways, parking, and restroom(s); (4) construction of a buried wall; and (5) long-term beach nourishment.

Park Merced

The Park Merced project is a long-term project that will be developed in several phases over the course of three decades. The project would increase residential density, provide a neighborhood core with new commercial and retail services, modify transit service and facilities, and improve utilities within the development site. A new pre-kindergarten through 5th grade (Pre-K to 5) school and day care facility, a fitness center, and new open space uses, including athletic fields, walking and biking paths, an approximately 2-acre organic farm, and community gardens, would also be provided.

Signalization of State Route 35 (Skyline Boulevard) and Great Highway Intersection

¹³ The State Office of Planning and Research has not established significance criteria for determining VMT impacts of recreational land uses. However, consistent with state-level guidance, the department through the Transportation Impact Analysis Guidelines establishes retail uses as a proxy for recreational land uses.

¹⁴ Governor's Office of Planning and Research. "Transportation Impacts (SB 743)." Accessed June 1, 2020. Available at: < <http://opr.ca.gov/ceqa/updates/sb-743/>>

Caltrans proposes the installation of a traffic signal at the intersection of Skyline Boulevard and the Great Highway. Upon completion of the project, anticipated in late 2022/early 2023, the intersection will be signal-controlled instead of stop-controlled.

Great Highway Closure between Sloat Boulevard and Lincoln Way

SFRPD and SFMTA may propose a two-year (2022-2024) pilot study of a road closure of the Great Highway between Sloat Boulevard and Lincoln Way to evaluate its effects on the transportation system prior to a long-term proposal for the roadway. The pilot road closure configuration has not yet been determined or approved.

Reconfiguration of the Sloat Boulevard and State Route 35 (Skyline Boulevard) Intersection

SFMTA proposes to reconfigure the intersection with a traffic signal to improve safety for all road users, increase visibility of pedestrians, and improve or maintain transit and vehicle circulation at the intersection.

Cumulative Plus Project Impacts

Construction

Project construction may overlap with the construction of other projects in the area, such as the Ocean Beach Long-Term Improvements Project. During the overlap period, nearby cumulative projects may increase the number of construction worker vehicles and construction trucks in the vicinity, who may use the same construction access routes to regional facilities and may result in temporary travel lane closures. Affected roadways may include the closed portion of the Great Highway (Ocean Beach Long-Term Improvements Project) and portions of Skyline Boulevard.

As with the proposed project, any project construction on public streets would be required to comply with Blue Book regulations. Construction activities would be coordinated with city departments such as the SFMTA and Public Works, as needed, for any temporary sidewalk, bicycle route, and travel lane closures to develop a traffic control plan. The traffic control plan would address construction-related vehicle routing, traffic control, and pedestrian and bicyclist movements adjacent to the project's construction area for the duration of any construction overlap with cumulative projects. Compliance with Blue Book regulations would help maintain the accessibility and safety of public streets for vehicles, bicyclists, and people walking and ensure construction does not adversely affect transit vehicle operations or result in substantial transit delay.

Given the limited number of projects in the immediate vicinity of the project area that would overlap with the proposed Lake Merced West Project construction, implementation of traffic control plan requirements contained within the SFMTA blue book that would be applicable to all cumulative projects, construction of the project in combination with cumulative projects would result in less-than-significant cumulative construction-related transportation impacts.

Potentially Hazardous Conditions, Accessibility, Substantial Public Transit Delay, and Freight and Passenger Loading

The permanent closure of the Great Highway between Sloat and Skyline boulevards would increase the number of vehicles travelling on both Sloat Boulevard and Skyline Boulevard due to diverted traffic in the north- and southbound directions. Implementation of the Park Merced project would also increase the number of vehicle trips in the surrounding area. Under cumulative conditions, both the Ocean Beach Long-Term Improvements project and Park Merced project would generate vehicle trips that would combine with vehicle trips from the proposed project on Skyline Boulevard, Sloat Boulevard, John Muir Drive, and Lake Merced Boulevard.

However, the Caltrans and Park Merced projects also include improvements to transportation and transit facilities in the surrounding area. As previously discussed, the proposed Caltrans project would install a traffic signal at the nearby intersection of Skyline Boulevard and the Great Highway to improve vehicular traffic flow and pedestrian safety. The Park Merced Transportation Plan also includes goals to reduce the need for private vehicle trips, enhance the attractiveness of alternative modes of transportation, internalize discretionary trips, and minimize increases in peak hour vehicle trips outside of the project area. A potential closure of the Great Highway between Sloat Boulevard and Lincoln Way would reduce the number of vehicles traveling on Sloat and Skyline boulevards, as vehicles would be redistributed to other roadways such as Sunset Boulevard and Nineteenth Avenue. The long-term configuration of the Great Highway, Skyline Boulevard, and Sloat Boulevard may change based on the results of the pilot study.

However, while cumulative projects would increase vehicle trips in the surrounding area, they would not combine with project-generated vehicle trips to the extent that they would impede emergency access at the project site or result in substantial transit delay. Delivery drivers typically look for convenient locations to park and make their deliveries. People arriving at or leaving a building or other destination typically do so as close to the entrance as possible. Freight and passenger loading would continue to occur in the parking lot in an off-street area; cumulative conditions would not affect on-site freight and passenger loading operations. None of the cumulative projects would make changes to the public right-of-way in the immediate vicinity of the Lake Merced project site. For these reasons, accessibility to the site would not be affected under cumulative conditions, nor would pedestrian and bicycle access. Therefore, the proposed project in combination with cumulative projects would result in less than significant cumulative impacts to accessibility, public transit delay, freight and passenger loading, and hazardous conditions.

Potentially Hazardous Conditions, Accessibility, Substantial Public Transit Delay, and Freight and Passenger Loading During Special Events

Up to 12 special events per year, with approximately 500 attendees per event, could be held at the project site. As previously discussed, the project's loading demand during special events would be accommodated within the project site, and loading activities would not generate secondary impacts on John Muir Drive to create potentially hazardous conditions and accessibility impacts. Implementation of cumulative projects in the project area would not alter roadway conditions on John Muir Drive such that there could be potential cumulative impacts related to hazardous conditions, accessibility, public transit delay, or loading. Furthermore, special events on the project site would only occur up to 12 times per year. Therefore, the proposed project would result in a less than significant cumulative freight and passenger loading impact, accessibility impact, emergency access impact, transit delay impact, and would not result in hazardous bicycle and pedestrian conditions during special events.

Vehicle Miles Traveled and Induced Automobile Travel

VMT by its nature is largely a cumulative impact. As described above, the project would not exceed the project-level quantitative thresholds of significance for VMT. Furthermore, the project site is an area where projected year 2040 VMT per capita is more than 15 percent below the future regional average for recreational uses (using retail as a proxy). Therefore, the project, in combination with cumulative projects, would not result in a significant cumulative VMT impact.

Attachments

- Attachment 1: Memorandum - Lake Merced West: Existing Boathouse Operations and Proposed Larger Boathouse Operations
- Attachment 2: SB 743 Checklist

ATTACHMENT 1

**MEMORANDUM - LAKE MERCED WEST:
EXISTING BOATHOUSE OPERATIONS AND
PROPOSED LARGER BOATHOUSE
OPERATIONS, JUNE 13, 2022**



memorandum

date June 13, 2022

to Chris Townes, Jackie Suen, SF Recreation and Parks (RPD)
Obi Nzewi, SFPUC
Julie Moore, Rick Cooper, SF Environmental Planning

cc

from Karen Lancelle and Deja Newton, ESA

subject Lake Merced West: Existing Boathouse Operations and Proposed Larger Boathouse Operations

In response to numerous public comments during the draft EIR public review, RPD requested that the final EIR include environmental analysis of a larger boathouse. Using the information provided by RPD, this memo summarizes relevant information about the existing boathouse operations and estimates the potential changes in boathouse operations and users that could occur if the Lake Merced West Project includes a larger (15,000 square foot) boathouse.

Existing Lake Merced Boathouse Operations

The Lake Merced Boathouse located at 1 Harding Road supports five rowing clubs. Constructed in 1958, the boathouse is a two-level concrete structure; each level is approximately 7,600 square feet. The boathouse is open daily from 5am to 9pm and is primarily used as a storage facility for boats and exercise equipment. Currently, 93 boats are stored in the boathouse. The boathouse also includes a 1,300 square foot ergometer exercise room.

The five rowing clubs each store a different number of boats in the boathouse, as follows:

- San Francisco Rowing Club – 15 boats
- San Francisco State University – 9 boats
- St. Ignatius High School – 16 boats
- Pacific Rowing Club – 26 boats
- Dolphin Club – 27 boats

Table 1 shows daily patterns of boathouse use. On average 236 rowers use the boathouse each day. The majority of rowers using the boathouse are a part of either Pacific Rowing Club or St. Ignatius High School, as shown in Table 1. These two clubs account for approximately 1,546 trips to the boathouse per week.

**TABLE 1
PATTERNS OF USE OF THE EXISTING LAKE MERCED BOATHOUSE**

Schedule	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Total User Trips
All Boathouse Users								
5 am – 8 am	30	52	52	52	117	69	10	784
9 am – 2 pm	6	6	6	6	6	89	80	199
3 pm – 7 pm	253	221	221	221	159	0	2	1,077
<i>Subtotals</i>	<i>289</i>	<i>279</i>	<i>279</i>	<i>279</i>	<i>282</i>	<i>158</i>	<i>92</i>	1,658
St. Ignatius and Pacific Rowing Club Users Only								
5 am – 8 am	20	32	52	32	117	69	0	322
9 am – 2 pm	0	0	0	0	0	89	60	149
3 pm – 7 pm	253	221	221	221	159	0	0	1,075
<i>Subtotals</i>	<i>273</i>	<i>253</i>	<i>273</i>	<i>253</i>	<i>276</i>	<i>158</i>	<i>60</i>	1,546

SOURCE: San Francisco Recreation and Parks Department

While the total number of users of the boathouse is lower on Saturdays than on weekdays, because more users are practicing on the water the number of boats on the lake at the same time is generally highest on Saturdays (40 boats). On a weekday afternoon approximately 25 boats are on the lake at a time. Rowing teams use specific areas in Lake Merced away from the shoreline for rowing practice (except when using a dock), and only row during daylight hours as there is no recreational lighting at the boathouse.

Along Harding Road there are 69 parking spaces associated with the boathouse. Users travel to the boathouse by car, carpool, or (for St. Ignatius students) by foot.

The rowing clubs hold meets at Lake Merced throughout the year, hosted at the boathouse. An estimated 1,000 people attend each rowing meet at Lake Merced. Organizers of special events at Lake Merced, including rowing meet organizers, are required to obtain a permit, provide volunteers to manage parking, and pay for two Park Rangers to be on site for the duration of the event.

Larger Boathouse at Lake Merced West

The potential larger Lake Merced West Boathouse would be approximately 15,000 square feet, as shown on **Figure 1**. Approximately 3,000 square feet of the larger boathouse would be used for rental watersports equipment storage, a rental kiosk, associated administrative space, and public restrooms. The remaining 12,000 square feet would potentially be used to store approximately up to 42 boats used by the Pacific Rowing, St. Ignatius clubs or other rowing users. These 42 boats would be moved from the existing boathouse to the larger boathouse.

To provide space for the larger boathouse, the arborist facility would be relocated, and its yard would be smaller than that proposed for the project. Access to the boathouse, parking/loading, and entrance/exit would be the same as the project.

Proposed Operations at Larger Lake Merced West Boathouse

The Pacific Rowing Club and St. Ignatius rowing club could potentially move 42 boats from the existing boathouse to the Lake Merced West Boathouse and varsity users would practice from the Lake Merced West Boathouse. As shown in **Table 2**, 129 varsity rowers use the boathouse each day during the week, and 69 varsity rowers use the boathouse on Saturdays. These users would commute to the new boathouse, either by foot or carpooling. Meets would not be held from the new boathouse. Besides entry to the lake at the proposed dock at Lake Merced West, the same areas of the lake would be used by the rowing clubs as is used under existing conditions.

**TABLE 2
PATTERNS OF USE OF THE PROPOSED LAKE MERCED WEST BOATHOUSE**

Schedule	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Total User Trips
St. Ignatius and Pacific Rowing Club Varsity Users Only								
5 am – 8 am	62	62	62	62	62	37	0	347
9 am – 2 pm	0	0	0	0	0	0	0	0
3 pm – 7 pm	67	67	67	67	67	32	0	367
<i>Subtotals</i>	<i>129</i>	<i>129</i>	<i>129</i>	<i>129</i>	<i>129</i>	<i>69</i>	<i>0</i>	714

SOURCE: San Francisco Recreation and Parks Department

Proposed Operations at Existing Lake Merced Boathouse

All five rowing clubs would continue to operate out of the existing Lake Merced Boathouse; however, the varsity rowers of the Pacific Rowing and St. Ignatius clubs could potentially move to the larger Lake Merced West boathouse as described above. With the varsity rowers at the larger boathouse, the Pacific Rowing and St. Ignatius clubs could potentially expand the middle school, adaptive, and masters rowing programs at the existing boathouse from 80 to approximately 105 users, and store 17 new boats at the existing boathouse, as shown in **Table 3**.

**TABLE 3
ANTICIPATED GROWTH IN PACIFIC ROWING AND ST. IGNATIUS CLUB USERS**

Age/Type of Rowing	Current Users	Estimated Growth in Users	Estimated Total New Users	Estimated Weekly Practice Frequency
Beginning middle school users	25	5	30	Once per week
Advanced middle school users	35	7	42	2-3 times per week
Adaptive rowing	0	7	7	2 times per week
Masters program	20	4	24	Once per week
Total	80	23	103	

SOURCE: San Francisco Recreation and Parks Department

During combined operations of both boathouses, on Saturdays up to approximately 45 boats would be on the lake simultaneously, a potential increase of five boats compared with existing conditions. On weekday afternoons, approximately 30 boats would be on the lake simultaneously, also an increase of five boats compared with existing conditions.

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ATTACHMENT 2
ELIGIBILITY CHECKLIST: CEQA SECTION
21099 MODERNIZATION OF
TRANSPORTATION ANALYSIS – LAKE
MERCED WEST PROJECT



ELIGIBILITY CHECKLIST: CEQA SECTION 21099 MODERNIZATION OF TRANSPORTATION ANALYSIS

Date of Preparation: October 18, 2021
Record No.: **2019-014146ENV, Lake Merced West Project**
Zoning: P – Public
OS Height and Bulk District
Block/Lot: 7283/004
Lot Size: 88,686 square feet (2.04 acres)
Project Sponsor: Recreation and Parks Department, Chris Townes, Chris.Townes@sfgov.org
Staff Contact: Ryan Shum, ryan.shum@sfgov.org

This checklist is in response to California Environmental Quality Act (CEQA) section 21099 – Modernization of Transportation Analysis for Transit-Oriented Infill Projects and Planning Commission Resolution 19579. CEQA Section 21099 allows for a determination that aesthetic and vehicular parking effects of a project need not be considered significant environmental effects. Planning Commission Resolution 19579 replaces automobile delay with vehicle miles traveled (VMT) analysis. This checklist provides screening criteria for determining if aesthetics, detailed VMT, and/or vehicular parking analysis is required for a project.

Aesthetics and Vehicular Parking

In accordance with CEQA section 21099, aesthetics and vehicular parking shall not be considered in determining if a project has the potential to result in significant environmental effects if the project meets the three criteria within Table 1. The proposed project does not meet all of the criteria in Table 1.

In accordance with the *San Francisco Transportation Impact Analysis Guidelines for Environmental Review*, to determine whether a secondary vehicle parking analysis is required, the department evaluates whether the project would result in a substantial vehicular parking deficit; if a project does not result in a substantial vehicular parking deficit, then the department does not require a secondary vehicular parking analysis. Projects within a location criterion (Table 2a) or that contain characteristic criteria (2c and 2d) do not require secondary vehicular parking analysis. The proposed project satisfies these criteria and therefore does not require a secondary parking analysis.

Vehicle Miles Traveled

In addition, CEQA section 21099(b)(1) requires that the State Office of Planning and Research develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects that “promote the reduction of greenhouse gas emissions, the development of multimodal

transportation networks, and a diversity of land uses.” In January 2016, the Office of Planning and Research published for public review and comment a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric. On March 3, 2016, based on compelling evidence in that document and on the department’s independent review of the literature on VMT and its own public process, the San Francisco Planning Commission adopted the Office of Planning and Research’s recommendation to use the VMT metric to evaluate the transportation impacts of projects. Since that resolution, the California Natural Resources Agency and the Office of Administrative Law went through a formal rulemaking process that finalized amendments to the CEQA Guidelines in December 2018.

In accordance with CEQA section 21099 and Planning Commission resolution 19579, the *San Francisco Transportation Impact Analysis Guidelines for Environmental Review* identify screening criteria to identify types, characteristics, and locations of projects and a list of transportation project types that would not result in significant transportation impacts under the VMT metric. As demonstrated by Table 2a, the proposed project described below meets one or more of the VMT screening criteria.

Project Description:

	Existing	Net Change	New Total	Notes
Project Description	The proposed Lake Merced West project would redevelop approximately 11 acres on the southwest side of Lake Merced. The proposed project is the construction and operation of the Lake Merced West recreation center, which would offer a wide array of recreational activities open to the public, such as trail use, picnicking, paddleboarding, kayaking, fishing, fitness activities, a ropes course, bird watching, space for outdoor exercise, skateboarding, multi-use courts for basketball and other activities, as well as restaurant dining, and indoor space for gatherings such as community meetings and birthday parties. The facility would include areas that could be used flexibly for a wide variety of uses such as picnics and larger gatherings; as well as areas designated for programmed activities. Upon completion of construction, the project site would include the following buildings and uses: community building (3,500 sf), restaurant (5,000 sf), boathouse (3,000 sf), restrooms and storage (1,000 sf), and SFPUC arborist office and yard (3,800 sf).			
On-Street Vehicle Parking (linear feet) & Street Name	No Change			
Off-Street Vehicle Parking Spaces (number per Land-Use)	0	+80	80	80
Off-Street Loading Spaces (number per Land-Use)	0	+3	3	3
On-Street Passenger Loading Space (linear feet of white color curb) & Street Name	No Change			
On-Street Commercial Loading Space (linear feet of yellow color curb) & Street Name	No Change			

Please include information on any relevant field notes, if applicable, and discussion of any notable transportation details with respect to the project, project site, and/or adjacent to the site, e.g., describe existing bus stop in front of the site, existing and/or proposed curb cut on a Transit Preferential Street, hospital / fire station / police station, on-street painted bike lane with no buffer between vehicular traffic, physically separated & protected bike lane, vehicular parking-protected bike lane, etc.

Table 1: Transit-Oriented Infill Project Eligibility Checklist

The project must meet all three criteria for aesthetics and vehicular parking to be excluded from CEQA review. See Attachment A for definitions of terms.

- Criterion 1-1. Does the project meet the definition of a residential, mixed-use residential, or “*employment center*” and
- Criterion 1-2. Is the proposed project located on an “*infill site*” and
Yes, the project site is located within the urban boundaries of San Francisco and was previously developed with the Pacific Rod and Gun Club.
- Criterion 1-3. Is the proposed project site located within a “*transit priority area*?”

Table 2a: Secondary Parking Analysis & Vehicle Miles Traveled Analysis for Land Use Project – Screening Criterion

If a project meets this screening criterion, then a secondary parking and detailed VMT analysis is not required.¹ If a project does not meet this screening criterion, then refer to Tables 2b and 2d for additional screening criteria related to VMT and secondary parking analysis, respectively. See Attachment A for definitions of terms.

- Criterion 2a. Is the proposed project site located within the “*map-based screening*” area?
Yes. The project site is located in TAZs 401, which exhibits VMT that is 26 and 15 percent below the respective existing and cumulative (2040) screening thresholds (Bay Area Regional Average Minus 15%) for retail uses, which is used as a proxy for park uses.

Table 2b: Vehicle Miles Traveled Analysis – Additional Screening Criteria

Identify whether a projects meets any of the additional screening criteria. See Attachment A for definitions of terms.

- Criterion 2b-1. Does the proposed project qualify as a “small project”? or
No. The project would generate more than 100 trips per day.

1 For projects that propose multiple land use types (e.g., residential, office, retail, etc.), each land use type must qualify under the three screening criteria in Table 2a.

- Criterion 2b-2. Proximity to Transit Stations (must meet all four sub-criteria)
- Is the proposed project site located within one-half mile of an existing major transit stop or an existing stop along a high-quality transit corridor; and
 - Would the proposed project result in a “floor area ratio” of greater than or equal to 0.75, and
 - Would the project result in an amount of vehicular parking that is less than or equal to the amount allowed by the Planning Code without a conditional use authorization, and
 - Is the proposed project consistent with the Sustainable Communities Strategy?²
 - Yes. The project site is located in a priority development area as shown in Plan Bay Area, *Plan Bay Area 2050: Final Blueprint Growth Geographies*, <https://mtc.maps.arcgis.com/apps/webappviewer/index.html?id=485e374221e84074b7e577ad381f6fce>, accessed February 8, 2021.

Table 2c: Induce Automobile Travel Analysis

If a project contains transportation elements and fits within the general types of projects described below, then a secondary parking and detailed VMT analysis is not required. If a project does not meet this screening criterion, then refer to Table 2d for additional screening criteria as it relates to secondary parking analysis. See Attachment A for definitions and other terms.

- Criterion 2c-1. Does the proposed project qualify as an “active transportation, rightsizing (aka Road Diet) and Transit Project”? or
- Criterion 2c-2. Does the proposed project qualify as an “other minor transportation project”?

Table 2d: Secondary Parking Analysis – Additional Screening Criterion

If a project does not meet the criteria within Tables 2a and 2c, then complete this box. A transportation consultant may need to provide information to complete this table.

- Criterion 2d. Would the project result in a vehicular parking demand deficit (land use project or area plan project) or net parking loss (infrastructure project) of less than 600 spaces?

2 The department considers a project inconsistent with the Sustainable Communities Strategy if it is located outside of an area contemplated for development in the Sustainable Communities Strategy.

ATTACHMENT A

DEFINITIONS

Active transportation, rightsizing (a.k.a. road diet) and transit project means any of the following:

- Reduction in number of through lanes
- Infrastructure projects, including safety and accessibility improvements, for people walking or bicycling
- Installation or reconfiguration of traffic-calming devices
- Creation of new, or expansion of existing, transit service
- Creation of new, or conversion of existing, general purpose lanes (including vehicle ramps) to transit lanes
- Creation of new, or addition of roadway capacity on, local or collector streets, if the project also substantially improves conditions for people walking, bicycling, and, if applicable, riding transit (e.g., by improving neighborhood connectivity or improving safety)

Employment center project means a project located on property zoned for commercial use that results in a floor area ratio of no less than 0.75 and that is located within a transit priority area. If the underlying zoning for the project site allows for commercial use and the project meets the rest of the criteria in this definition, then the project may be considered an employment center.

Floor area ratio means the ratio of gross floor area that results from the project, excluding structured vehicular parking areas (per Planning Code section [102](#) definition of gross floor area), proposed as a result of the project divided by the net lot area.

Gross floor area is defined in Planning Code section [102](#).

High quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Infill site means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.

Lot means all parcels utilized by the project.

Major transit stop is defined in CEQA Section 21064.3 as a site containing a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

Map-based screening means the proposed project site is located within a transportation analysis zone that exhibits levels of VMT below the department's threshold of significance for land use projects.

Net lot area means the area of a lot, excluding publicly dedicated land and private streets that meet local standards, and other public use areas as determined by the local land use authority.

Other land use project means a land use other than residential, retail, and office. OPR has not provided proposed screening criteria or thresholds of significance for other types of land uses, other than those that meet the definition of a small project.

- Hotel, motel, student housing, single room occupancy unit, and group housing land uses should be treated as residential for screening and analysis.
- Child care facilities, K-12 schools, post-secondary institutional (non-student housing), medical, and production, distribution, and repair (PDR) land uses should be treated as office for screening and analysis.
- Grocery store, local-serving entertainment venue, religious institution, park, and athletic club land uses should be treated as retail for screening and analysis.
- Public service (e.g., police and fire station, public utilities) and do not generally generate VMT. Instead, these land uses are often built in response to development from other land uses (e.g., office and residential). Therefore, these land uses can be presumed to have less-than-significant impacts on VMT. However, this presumption would not apply if the project is sited in a location that would require employees or visitors to travel substantial distances and the project is not located within one-half mile of a major transit stop or does not meet the small project screening criterion.
- Event centers and regional-serving entertainment venues would most likely require a detailed VMT analysis. Therefore, no screening criterion is applicable.

Other minor transportation project means any of the following:

- Rehabilitation, maintenance, replacement, and repair projects designed to improve the condition of existing transportation assets (e.g., highways, roadways, bridges, culverts, tunnels, transit systems, and facilities for people bicycling or walking) and that do not add additional motor vehicle capacity
- Installation, removal, or reconfiguration of traffic lanes that are not for through-traffic, such as left, right, and U-turn pockets, or emergency breakdown lanes that are not used as through-lanes
- Conversion of existing general purpose lanes (including vehicle ramps) to managed lanes (e.g., high occupancy vehicle (HOV), high occupancy toll (HOT), or trucks) or transit lanes
- Grade separation to separate vehicles from rail, transit, people walking or bicycling, or to replace a lane to separate preferential vehicles (e.g., HOV, HOT, or trucks) from general vehicles

- Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features
- Traffic metering systems
- Timing of signals to optimize flow of people walking, bicycling, and/or driving on local or collector streets
- Installation of a modern roundabout or traffic calming circle
- Adoption of or increase in tolls
- Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes
- Addition of transportation wayfinding signs
- Removal of off- or on-street vehicular parking space(s)
- Adoption, removal, or modification of on-street vehicular parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)

Small project means that the project would not result in more than 100 vehicle trips per day.

Transit priority area means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.

Vehicle miles traveled measures the amount and distance that a project might cause people to drive and accounts for the number of passengers per vehicle.

J2 AIR QUALITY SUPPORTING DOCUMENTATION

Lake Merced West - San Francisco County, Annual

**Lake Merced West
San Francisco County, Annual**

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
City Park	11.00	Acre	11.00	479,160.00	0
Quality Restaurant	5.00	1000sqft	0.00	20.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	4.6	Precipitation Freq (Days)	64
Climate Zone	5			Operational Year	2026
Utility Company	City and County of San Francisco				
CO2 Intensity (lb/MW hr)	76.28	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

- Project Characteristics -
- Land Use - All acreage captured under City Park land use
- Construction Phase - Adjusted construction phases to match project description
- Off-road Equipment -
- Off-road Equipment - Building equipment from project description
- Off-road Equipment - Demolition equipment from project description
- Off-road Equipment -
- Off-road Equipment - Remediation equipment from project description

Off-road Equipment - Remediation equipment from project description

Trips and VMT - Haul truck trips per Project Description. Composite trip length to basin edge to SR 152. Vendor trips per PD.

Demolition -

Grading - 11 acre site. Not all site will be graded.

Vehicle Trips - Adjust Trip Rates to match Transportation Memo Trip Generation Special event trips added to Saturday. All trips allocated to park use.

Vehicle Emission Factors -

Vehicle Emission Factors -

Vehicle Emission Factors -

Consumer Products - SF-specific ROG factor

Energy Use - T24 rates adjusted to account for 2019 updates.

Water And Wastewater - All WWTP aerobic in SF

Construction Off-road Equipment Mitigation - Clean construction ordinance requires Levcel 3 VDEC on equipment greater than 25 hp.

Fleet Mix -

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Nonresidential_Exterior	10.00	2,500.00
tblArchitecturalCoating	ConstArea_Nonresidential_Interior	30.00	7,500.00
tblAreaCoating	Area_Nonresidential_Exterior	10	2500
tblAreaCoating	Area_Nonresidential_Interior	30	7500
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	6.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	6.00
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstructionPhase	NumDays	20.00	63.00
tblConstructionPhase	NumDays	30.00	43.00
tblConstructionPhase	NumDays	300.00	520.00
tblConsumerProducts	ROG_EF	2.14E-05	1.51E-05
tblEnergyUse	T24E	2.67	2.64
tblEnergyUse	T24NG	39.90	35.63
tblLandUse	LandUseSquareFeet	5,000.00	20.00

tblLandUse	LotAcreage	0.11	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblTripsAndVMT	HaulingTripLength	20.00	36.00
tblTripsAndVMT	HaulingTripNumber	218.00	280.00
tblTripsAndVMT	HaulingTripNumber	0.00	3,180.00
tblTripsAndVMT	HaulingTripNumber	0.00	400.00
tblTripsAndVMT	VendorTripNumber	79.00	5.00
tblTripsAndVMT	VendorTripNumber	79.00	0.00
tblTripsAndVMT	WorkerTripNumber	5.00	15.00
tblTripsAndVMT	WorkerTripNumber	201.00	203.00
tblTripsAndVMT	WorkerTripNumber	201.00	10.00
tblTripsAndVMT	WorkerTripNumber	40.00	41.00
tblVehicleTrips	DV_TP	28.00	0.00
tblVehicleTrips	PB_TP	6.00	0.00
tblVehicleTrips	PR_TP	66.00	100.00
tblVehicleTrips	ST_TR	22.75	88.82
tblVehicleTrips	ST_TR	94.36	0.00
tblVehicleTrips	SU_TR	16.74	69.73
tblVehicleTrips	SU_TR	72.16	0.00
tblVehicleTrips	WD_TR	1.89	104.91
tblVehicleTrips	WD_TR	89.95	0.00
tblWater	AerobicPercent	87.46	100.00

tblWater	AerobicPercent	87.46	100.00
tblWater	AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0840	0.8716	0.7752	1.7000e-003	0.2214	0.0355	0.2570	0.0837	0.0327	0.1164	0.0000	152.1868	152.1868	0.0459	0.0000	153.3335
2024	0.3891	3.7082	3.3094	8.1200e-003	0.2621	0.1492	0.4113	0.0670	0.1374	0.2043	0.0000	723.8952	723.8952	0.1988	0.0000	728.8663
2025	0.7050	6.4827	6.3004	0.0160	0.4700	0.2545	0.7246	0.1206	0.2344	0.3550	0.0000	1,422.7331	1,422.7331	0.3930	0.0000	1,432.5591
2026	0.3799	3.2463	3.2268	8.0200e-003	0.2584	0.1286	0.3870	0.0661	0.1184	0.1845	0.0000	714.5913	714.5913	0.1979	0.0000	719.5387
Maximum	0.7050	6.4827	6.3004	0.0160	0.4700	0.2545	0.7246	0.1206	0.2344	0.3550	0.0000	1,422.7331	1,422.7331	0.3930	0.0000	1,432.5591

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					

2023	0.0673	0.6824	0.8193	1.7000e-003	0.2214	0.0257	0.2471	0.0837	0.0237	0.1074	0.0000	152.1867	152.1867	0.0459	0.0000	153.3333
2024	0.3451	3.2422	3.4810	8.1200e-003	0.2621	0.1253	0.3874	0.0670	0.1156	0.1826	0.0000	723.8945	723.8945	0.1988	0.0000	728.8656
2025	0.6277	5.6811	6.6442	0.0160	0.4700	0.2154	0.6854	0.1206	0.1989	0.3194	0.0000	1,422.7317	1,422.7317	0.3930	0.0000	1,432.5577
2026	0.3423	2.8562	3.3940	8.0200e-003	0.2584	0.1095	0.3680	0.0661	0.1011	0.1672	0.0000	714.5906	714.5906	0.1979	0.0000	719.5380
Maximum	0.6277	5.6811	6.6442	0.0160	0.4700	0.2154	0.6854	0.1206	0.1989	0.3194	0.0000	1,422.7317	1,422.7317	0.3930	0.0000	1,432.5577

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	11.28	12.91	-5.34	0.00	0.00	16.18	5.16	0.00	15.98	9.72	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	6-3-2024	9-2-2024	1.4172	1.2406
2	9-3-2024	12-2-2024	2.0189	1.7678
3	12-3-2024	3-2-2025	1.8458	1.6190
4	3-3-2025	6-2-2025	1.8090	1.5877
5	6-3-2025	9-2-2025	1.8073	1.5860
6	9-3-2025	12-2-2025	1.7913	1.5724
7	12-3-2025	3-2-2026	1.7706	1.5541
8	3-3-2026	6-2-2026	1.9427	1.7214
9	6-3-2026	9-2-2026	0.5097	0.4472
		Highest	2.0189	1.7678

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

Area	7.1800e-003	0.0000	1.5000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004
Energy	2.0000e-005	1.6000e-004	1.3000e-004	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.1947	0.1947	1.0000e-005	0.0000	0.1964
Mobile	0.2344	0.9671	2.8122	0.0117	1.1715	0.0119	1.1834	0.3154	0.0111	0.3265	0.0000	1,080.8220	1,080.8220	0.0431	0.0000	1,081.9002
Waste						0.0000	0.0000		0.0000	0.0000	1.1185	0.0000	1.1185	0.0661	0.0000	2.7710
Water						0.0000	0.0000		0.0000	0.0000	0.5370	1.8830	2.4200	2.5600e-003	1.3200e-003	2.8762
Total	0.2416	0.9672	2.8125	0.0117	1.1715	0.0119	1.1834	0.3154	0.0111	0.3265	1.6554	1,082.9000	1,084.5554	0.1118	1.3200e-003	1,087.7441

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	7.1800e-003	0.0000	1.5000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004
Energy	2.0000e-005	1.6000e-004	1.3000e-004	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.1947	0.1947	1.0000e-005	0.0000	0.1964
Mobile	0.2344	0.9671	2.8122	0.0117	1.1715	0.0119	1.1834	0.3154	0.0111	0.3265	0.0000	1,080.8220	1,080.8220	0.0431	0.0000	1,081.9002
Waste						0.0000	0.0000		0.0000	0.0000	1.1185	0.0000	1.1185	0.0661	0.0000	2.7710
Water						0.0000	0.0000		0.0000	0.0000	0.5370	1.8830	2.4200	2.5600e-003	1.3200e-003	2.8762
Total	0.2416	0.9672	2.8125	0.0117	1.1715	0.0119	1.1834	0.3154	0.0111	0.3265	1.6554	1,082.9000	1,084.5554	0.1118	1.3200e-003	1,087.7441

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	2/1/2023	4/28/2023	5	63	
2	Remediation and Backfill	Grading	3/1/2023	4/28/2023	5	43	
3	Building Construction	Building Construction	7/1/2024	6/28/2026	5	520	
4	Paving	Paving	4/4/2026	5/1/2026	5	20	
5	Architectural Coating	Architectural Coating	5/3/2026	5/31/2026	5	20	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 7,500; Non-Residential Outdoor: 2,500; Striped Parking Area: 0

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	0	8.00	81	0.73
Demolition	Excavators	0	8.00	158	0.38
Demolition	Rubber Tired Dozers	0	8.00	247	0.40
Demolition	Scrapers	0	8.00	367	0.48
Demolition	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Aerial Lifts	2	8.00	63	0.31
Building Construction	Bore/Drill Rigs	1	2.00	221	0.50
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Excavators	1	8.00	158	0.38
Building Construction	Excavators	2	8.00	158	0.38
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Forklifts	0	8.00	89	0.20
Building Construction	Generator Sets	0	8.00	84	0.74
Building Construction	Graders	2	8.00	187	0.41

Building Construction	Graders	0	8.00	187	0.41
Building Construction	Plate Compactors	2	8.00	8	0.43
Building Construction	Rubber Tired Dozers	2	8.00	247	0.40
Building Construction	Rubber Tired Dozers	0	8.00	247	0.40
Building Construction	Scrapers	2	8.00	367	0.48
Building Construction	Scrapers	0	8.00	367	0.48
Building Construction	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Building Construction	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Building Construction	Welders	0	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48
Remediation and Backfill	Excavators	2	8.00	158	0.38
Remediation and Backfill	Graders	1	8.00	187	0.41
Remediation and Backfill	Rubber Tired Dozers	1	8.00	247	0.40
Remediation and Backfill	Scrapers	2	8.00	367	0.48
Remediation and Backfill	Tractors/Loaders/Backhoes	2	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	2	15.00	0.00	280.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Remediation and Backfill	8	20.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	21	203.00	5.00	3,180.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	21	10.00	0.00	400.00	10.80	7.30	36.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	41.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

3.2 Demolition - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0255	0.0000	0.0255	3.8600e-003	0.0000	3.8600e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.5400e-003	0.0968	0.1406	2.0000e-004		4.7800e-003	4.7800e-003		4.3900e-003	4.3900e-003	0.0000	17.2359	17.2359	5.5700e-003	0.0000	17.3753
Total	9.5400e-003	0.0968	0.1406	2.0000e-004	0.0255	4.7800e-003	0.0303	3.8600e-003	4.3900e-003	8.2500e-003	0.0000	17.2359	17.2359	5.5700e-003	0.0000	17.3753

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	7.7000e-004	0.0314	0.0152	1.1000e-004	2.3500e-003	6.0000e-005	2.4100e-003	6.4000e-004	6.0000e-005	7.0000e-004	0.0000	11.6503	11.6503	2.2600e-003	0.0000	11.7068
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2000e-003	7.0000e-004	8.5500e-003	3.0000e-005	3.7300e-003	3.0000e-005	3.7600e-003	9.9000e-004	3.0000e-005	1.0200e-003	0.0000	3.1674	3.1674	6.0000e-005	0.0000	3.1689
Total	1.9700e-003	0.0321	0.0238	1.4000e-004	6.0800e-003	9.0000e-005	6.1700e-003	1.6300e-003	9.0000e-005	1.7200e-003	0.0000	14.8177	14.8177	2.3200e-003	0.0000	14.8757

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0255	0.0000	0.0255	3.8600e-003	0.0000	3.8600e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.4600e-003	0.0233	0.1465	2.0000e-004		9.9000e-004	9.9000e-004		9.3000e-004	9.3000e-004	0.0000	17.2359	17.2359	5.5700e-003	0.0000	17.3752
Total	3.4600e-003	0.0233	0.1465	2.0000e-004	0.0255	9.9000e-004	0.0265	3.8600e-003	9.3000e-004	4.7900e-003	0.0000	17.2359	17.2359	5.5700e-003	0.0000	17.3752

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	7.7000e-004	0.0314	0.0152	1.1000e-004	2.3500e-003	6.0000e-005	2.4100e-003	6.4000e-004	6.0000e-005	7.0000e-004	0.0000	11.6503	11.6503	2.2600e-003	0.0000	11.7068
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2000e-003	7.0000e-004	8.5500e-003	3.0000e-005	3.7300e-003	3.0000e-005	3.7600e-003	9.9000e-004	3.0000e-005	1.0200e-003	0.0000	3.1674	3.1674	6.0000e-005	0.0000	3.1689
Total	1.9700e-003	0.0321	0.0238	1.4000e-004	6.0800e-003	9.0000e-005	6.1700e-003	1.6300e-003	9.0000e-005	1.7200e-003	0.0000	14.8177	14.8177	2.3200e-003	0.0000	14.8757

3.3 Remediation and Backfill - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

Fugitive Dust					0.1865	0.0000	0.1865	0.0773	0.0000	0.0773	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0714	0.7421	0.6031	1.3300e-003		0.0306	0.0306		0.0282	0.0282	0.0000	117.2507	117.2507	0.0379	0.0000	118.1987
Total	0.0714	0.7421	0.6031	1.3300e-003	0.1865	0.0306	0.2171	0.0773	0.0282	0.1055	0.0000	117.2507	117.2507	0.0379	0.0000	118.1987

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0900e-003	6.4000e-004	7.7800e-003	3.0000e-005	3.4000e-003	3.0000e-005	3.4200e-003	9.0000e-004	2.0000e-005	9.3000e-004	0.0000	2.8825	2.8825	5.0000e-005	0.0000	2.8838
Total	1.0900e-003	6.4000e-004	7.7800e-003	3.0000e-005	3.4000e-003	3.0000e-005	3.4200e-003	9.0000e-004	2.0000e-005	9.3000e-004	0.0000	2.8825	2.8825	5.0000e-005	0.0000	2.8838

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1865	0.0000	0.1865	0.0773	0.0000	0.0773	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0608	0.6263	0.6412	1.3300e-003		0.0246	0.0246		0.0227	0.0227	0.0000	117.2506	117.2506	0.0379	0.0000	118.1986
Total	0.0608	0.6263	0.6412	1.3300e-003	0.1865	0.0246	0.2111	0.0773	0.0227	0.1000	0.0000	117.2506	117.2506	0.0379	0.0000	118.1986

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0900e-003	6.4000e-004	7.7800e-003	3.0000e-005	3.4000e-003	3.0000e-005	3.4200e-003	9.0000e-004	2.0000e-005	9.3000e-004	0.0000	2.8825	2.8825	5.0000e-005	0.0000	2.8838
Total	1.0900e-003	6.4000e-004	7.7800e-003	3.0000e-005	3.4000e-003	3.0000e-005	3.4200e-003	9.0000e-004	2.0000e-005	9.3000e-004	0.0000	2.8825	2.8825	5.0000e-005	0.0000	2.8838

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.3518	3.5572	3.0056	6.6700e-003		0.1481	0.1481		0.1364	0.1364	0.0000	584.3970	584.3970	0.1881	0.0000	589.0995
Total	0.3518	3.5572	3.0056	6.6700e-003		0.1481	0.1481		0.1364	0.1364	0.0000	584.3970	584.3970	0.1881	0.0000	589.0995

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.6000e-003	0.1030	0.0547	3.7000e-004	0.0514	2.1000e-004	0.0516	0.0128	2.0000e-004	0.0131	0.0000	40.4139	40.4139	8.0400e-003	0.0000	40.6148
Vendor	7.3000e-004	0.0290	0.0108	8.0000e-005	3.6800e-003	4.0000e-005	3.7200e-003	1.0000e-003	4.0000e-005	1.0400e-003	0.0000	8.5978	8.5978	1.1500e-003	0.0000	8.6266
Worker	0.0340	0.0191	0.2383	1.0000e-003	0.2071	8.1000e-004	0.2079	0.0531	7.4000e-004	0.0539	0.0000	90.4865	90.4865	1.5600e-003	0.0000	90.5254
Total	0.0373	0.1510	0.3038	1.4500e-003	0.2621	1.0600e-003	0.2631	0.0670	9.8000e-004	0.0679	0.0000	139.4982	139.4982	0.0108	0.0000	139.7668

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.3078	3.0912	3.1771	6.6700e-003		0.1243	0.1243		0.1146	0.1146	0.0000	584.3963	584.3963	0.1881	0.0000	589.0988
Total	0.3078	3.0912	3.1771	6.6700e-003		0.1243	0.1243		0.1146	0.1146	0.0000	584.3963	584.3963	0.1881	0.0000	589.0988

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.6000e-003	0.1030	0.0547	3.7000e-004	0.0514	2.1000e-004	0.0516	0.0128	2.0000e-004	0.0131	0.0000	40.4139	40.4139	8.0400e-003	0.0000	40.6148

Vendor	7.3000e-004	0.0290	0.0108	8.0000e-005	3.6800e-003	4.0000e-005	3.7200e-003	1.0000e-003	4.0000e-005	1.0400e-003	0.0000	8.5978	8.5978	1.1500e-003	0.0000	8.6266
Worker	0.0340	0.0191	0.2383	1.0000e-003	0.2071	8.1000e-004	0.2079	0.0531	7.4000e-004	0.0539	0.0000	90.4865	90.4865	1.5600e-003	0.0000	90.5254
Total	0.0373	0.1510	0.3038	1.4500e-003	0.2621	1.0600e-003	0.2631	0.0670	9.8000e-004	0.0679	0.0000	139.4982	139.4982	0.0108	0.0000	139.7668

3.4 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.6344	6.1976	5.7273	0.0132		0.2525	0.2525		0.2325	0.2325	0.0000	1,155.3373	1,155.3373	0.3719	0.0000	1,164.6339
Total	0.6344	6.1976	5.7273	0.0132		0.2525	0.2525		0.2325	0.2325	0.0000	1,155.3373	1,155.3373	0.3719	0.0000	1,164.6339

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	5.0600e-003	0.1948	0.1114	7.1000e-004	0.0534	4.0000e-004	0.0538	0.0136	3.8000e-004	0.0140	0.0000	78.9530	78.9530	0.0161	0.0000	79.3552
Vendor	1.3900e-003	0.0559	0.0214	1.6000e-004	7.2800e-003	8.0000e-005	7.3500e-003	1.9700e-003	7.0000e-005	2.0500e-003	0.0000	16.8446	16.8446	2.2800e-003	0.0000	16.9015
Worker	0.0642	0.0345	0.4403	1.8900e-003	0.4094	1.5900e-003	0.4110	0.1050	1.4600e-003	0.1065	0.0000	171.5982	171.5982	2.8100e-003	0.0000	171.6684
Total	0.0706	0.2852	0.5732	2.7600e-003	0.4700	2.0700e-003	0.4721	0.1206	1.9100e-003	0.1225	0.0000	267.3958	267.3958	0.0212	0.0000	267.9251

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.5571	5.3959	6.0710	0.0132		0.2134	0.2134		0.1969	0.1969	0.0000	1,155.3359	1,155.3359	0.3719	0.0000	1,164.6325
Total	0.5571	5.3959	6.0710	0.0132		0.2134	0.2134		0.1969	0.1969	0.0000	1,155.3359	1,155.3359	0.3719	0.0000	1,164.6325

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	5.0600e-003	0.1948	0.1114	7.1000e-004	0.0534	4.0000e-004	0.0538	0.0136	3.8000e-004	0.0140	0.0000	78.9530	78.9530	0.0161	0.0000	79.3552
Vendor	1.3900e-003	0.0559	0.0214	1.6000e-004	7.2800e-003	8.0000e-005	7.3500e-003	1.9700e-003	7.0000e-005	2.0500e-003	0.0000	16.8446	16.8446	2.2800e-003	0.0000	16.9015
Worker	0.0642	0.0345	0.4403	1.8900e-003	0.4094	1.5900e-003	0.4110	0.1050	1.4600e-003	0.1065	0.0000	171.5982	171.5982	2.8100e-003	0.0000	171.6684
Total	0.0706	0.2852	0.5732	2.7600e-003	0.4700	2.0700e-003	0.4721	0.1206	1.9100e-003	0.1225	0.0000	267.3958	267.3958	0.0212	0.0000	267.9251

3.4 Building Construction - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.3087	3.0157	2.7868	6.4200e-003		0.1229	0.1229		0.1131	0.1131	0.0000	562.1756	562.1756	0.1810	0.0000	566.6993
Total	0.3087	3.0157	2.7868	6.4200e-003		0.1229	0.1229		0.1131	0.1131	0.0000	562.1756	562.1756	0.1810	0.0000	566.6993

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.4300e-003	0.0907	0.0559	3.4000e-004	0.0513	1.9000e-004	0.0515	0.0128	1.8000e-004	0.0130	0.0000	37.9773	37.9773	7.9200e-003	0.0000	38.1752
Vendor	6.6000e-004	0.0265	0.0105	8.0000e-005	3.5400e-003	4.0000e-005	3.5800e-003	9.6000e-004	3.0000e-005	9.9000e-004	0.0000	8.1245	8.1245	1.1100e-003	0.0000	8.1522
Worker	0.0300	0.0155	0.2013	8.9000e-004	0.1992	7.5000e-004	0.2000	0.0511	6.9000e-004	0.0518	0.0000	80.4122	80.4122	1.2500e-003	0.0000	80.4435
Total	0.0330	0.1327	0.2677	1.3100e-003	0.2540	9.8000e-004	0.2550	0.0649	9.0000e-004	0.0658	0.0000	126.5139	126.5139	0.0103	0.0000	126.7709

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2711	2.6256	2.9541	6.4200e-003		0.1038	0.1038		0.0958	0.0958	0.0000	562.1749	562.1749	0.1810	0.0000	566.6986

Total	0.2711	2.6256	2.9541	6.4200e-003		0.1038	0.1038		0.0958	0.0958	0.0000	562.1749	562.1749	0.1810	0.0000	566.6986
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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.4300e-003	0.0907	0.0559	3.4000e-004	0.0513	1.9000e-004	0.0515	0.0128	1.8000e-004	0.0130	0.0000	37.9773	37.9773	7.9200e-003	0.0000	38.1752
Vendor	6.6000e-004	0.0265	0.0105	8.0000e-005	3.5400e-003	4.0000e-005	3.5800e-003	9.6000e-004	3.0000e-005	9.9000e-004	0.0000	8.1245	8.1245	1.1100e-003	0.0000	8.1522
Worker	0.0300	0.0155	0.2013	8.9000e-004	0.1992	7.5000e-004	0.2000	0.0511	6.9000e-004	0.0518	0.0000	80.4122	80.4122	1.2500e-003	0.0000	80.4435
Total	0.0330	0.1327	0.2677	1.3100e-003	0.2540	9.8000e-004	0.2550	0.0649	9.0000e-004	0.0658	0.0000	126.5139	126.5139	0.0103	0.0000	126.7709

3.5 Paving - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.1500e-003	0.0858	0.1458	2.3000e-004		4.1900e-003	4.1900e-003		3.8500e-003	3.8500e-003	0.0000	20.0193	20.0193	6.4700e-003	0.0000	20.1811
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	9.1500e-003	0.0858	0.1458	2.3000e-004		4.1900e-003	4.1900e-003		3.8500e-003	3.8500e-003	0.0000	20.0193	20.0193	6.4700e-003	0.0000	20.1811

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.3000e-004	1.7000e-004	2.2300e-003	1.0000e-005	1.1900e-003	1.0000e-005	1.1900e-003	3.2000e-004	1.0000e-005	3.2000e-004	0.0000	0.8918	0.8918	1.0000e-005	0.0000	0.8921
Total	3.3000e-004	1.7000e-004	2.2300e-003	1.0000e-005	1.1900e-003	1.0000e-005	1.1900e-003	3.2000e-004	1.0000e-005	3.2000e-004	0.0000	0.8918	0.8918	1.0000e-005	0.0000	0.8921

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.1500e-003	0.0858	0.1458	2.3000e-004		4.1900e-003	4.1900e-003		3.8500e-003	3.8500e-003	0.0000	20.0192	20.0192	6.4700e-003	0.0000	20.1811
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	9.1500e-003	0.0858	0.1458	2.3000e-004		4.1900e-003	4.1900e-003		3.8500e-003	3.8500e-003	0.0000	20.0192	20.0192	6.4700e-003	0.0000	20.1811

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Worker	9.1000e-004	4.7000e-004	6.1000e-003	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.4375	2.4375	4.0000e-005	0.0000	2.4385
Total	9.1000e-004	4.7000e-004	6.1000e-003	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.4375	2.4375	4.0000e-005	0.0000	2.4385

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0261					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.7100e-003	0.0115	0.0181	3.0000e-005		5.2000e-004	5.2000e-004		5.2000e-004	5.2000e-004	0.0000	2.5533	2.5533	1.4000e-004	0.0000	2.5567
Total	0.0278	0.0115	0.0181	3.0000e-005		5.2000e-004	5.2000e-004		5.2000e-004	5.2000e-004	0.0000	2.5533	2.5533	1.4000e-004	0.0000	2.5567

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.1000e-004	4.7000e-004	6.1000e-003	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.4375	2.4375	4.0000e-005	0.0000	2.4385
Total	9.1000e-004	4.7000e-004	6.1000e-003	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.4375	2.4375	4.0000e-005	0.0000	2.4385

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.2344	0.9671	2.8122	0.0117	1.1715	0.0119	1.1834	0.3154	0.0111	0.3265	0.0000	1,080.8220	1,080.8220	0.0431	0.0000	1,081.9002
Unmitigated	0.2344	0.9671	2.8122	0.0117	1.1715	0.0119	1.1834	0.3154	0.0111	0.3265	0.0000	1,080.8220	1,080.8220	0.0431	0.0000	1,081.9002

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	1,154.01	977.02	767.03	3,136,025	3,136,025
Quality Restaurant	0.00	0.00	0.00		
Total	1,154.01	977.02	767.03	3,136,025	3,136,025

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	9.50	7.30	7.30	33.00	48.00	19.00	100	0	0
Quality Restaurant	9.50	7.30	7.30	12.00	69.00	19.00	38	18	44

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.603873	0.037286	0.192865	0.090708	0.013128	0.005155	0.032618	0.009408	0.004276	0.003135	0.006045	0.000953	0.000549
Quality Restaurant	0.603873	0.037286	0.192865	0.090708	0.013128	0.005155	0.032618	0.009408	0.004276	0.003135	0.006045	0.000953	0.000549

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0200	0.0200	1.0000e-005	0.0000	0.0207
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0200	0.0200	1.0000e-005	0.0000	0.0207
NaturalGas Mitigated	2.0000e-005	1.6000e-004	1.3000e-004	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.1747	0.1747	0.0000	0.0000	0.1757
NaturalGas Unmitigated	2.0000e-005	1.6000e-004	1.3000e-004	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.1747	0.1747	0.0000	0.0000	0.1757

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Quality Restaurant	3273	2.0000e-005	1.6000e-004	1.3000e-004	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.1747	0.1747	0.0000	0.0000	0.1757
Total		2.0000e-005	1.6000e-004	1.3000e-004	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.1747	0.1747	0.0000	0.0000	0.1757

Mitigated

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Quality Restaurant	3273	2.0000e-005	1.6000e-004	1.3000e-004	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.1747	0.1747	0.0000	0.0000	0.1757
Total		2.0000e-005	1.6000e-004	1.3000e-004	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.1747	0.1747	0.0000	0.0000	0.1757

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Quality Restaurant	579	0.0200	1.0000e-005	0.0000	0.0207
Total		0.0200	1.0000e-005	0.0000	0.0207

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
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Consumer Products	4.5600e-003					0.0000	0.0000			0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0000e-005	0.0000	1.5000e-004	0.0000		0.0000	0.0000			0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004
Total	7.1800e-003	0.0000	1.5000e-004	0.0000		0.0000	0.0000			0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
SubCategory	tons/yr										MT/yr						
Architectural Coating	2.6100e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.5600e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0000e-005	0.0000	1.5000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004	
Total	7.1800e-003	0.0000	1.5000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004	

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	2.4200	2.5600e-003	1.3200e-003	2.8762

Unmitigated	2.4200	2.5600e-003	1.3200e-003	2.8762
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7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 13.1063	1.5872	6.0000e-004	1.2000e-004	1.6395
Quality Restaurant	1.51767 / 0.0968725	0.8328	1.9600e-003	1.1900e-003	1.2368
Total		2.4200	2.5600e-003	1.3100e-003	2.8762

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 13.1063	1.5872	6.0000e-004	1.2000e-004	1.6395
Quality Restaurant	1.51767 / 0.0968725	0.8328	1.9600e-003	1.1900e-003	1.2368
Total		2.4200	2.5600e-003	1.3100e-003	2.8762

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	1.1185	0.0661	0.0000	2.7710
Unmitigated	1.1185	0.0661	0.0000	2.7710

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0.95	0.1928	0.0114	0.0000	0.4778
Quality Restaurant	4.56	0.9256	0.0547	0.0000	2.2932
Total		1.1185	0.0661	0.0000	2.7710

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
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Land Use	tons	MT/yr			
City Park	0.95	0.1928	0.0114	0.0000	0.4778
Quality Restaurant	4.56	0.9256	0.0547	0.0000	2.2932
Total		1.1185	0.0661	0.0000	2.7710

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Calculation of Average Daily Construction Emissions

Construction Days = 583

Total Emissions (Tons)

Construction ROG =	1.558
Construction NOx=	14.3088
Construction PM10=	0.5678
Construction PM2.5=	0.5229

Average Daily Emissions (pounds/day)

5.34
49.09
1.95
1.79

MITIGATION MONITORING AND REPORTING PROGRAM - LAKE MERCED WEST PROJECT

PHASE 1: San Francisco Public Utilities Commission - Building Demolition and Soil Remediation

PHASE 2: San Francisco Recreation and Parks Department – Construction Phases 2 and 3 and Project Operations

MITIGATION MONITORING AND REPORTING PROGRAM PHASE 1: SAN FRANCISCO PUBLIC UTILITIES COMMISSION* – BUILDING DEMOLITION AND SOIL REMEDIATION

<i>Record No.:</i>	2019-014146ENV	<i>Block/Lot:</i>	7283/004
<i>Project Title:</i>	Lake Merced West Project	<i>Lot Size:</i>	11 acres
<i>Zoning:</i>	Public Use District Open Space Height and Bulk District	<i>Project Sponsor:</i>	San Francisco Public Utilities Commission
		<i>Lead Agency:</i>	San Francisco Planning Department
		<i>Staff Contact:</i>	Julie Moore – (628) 652-7566 CPC.LakeMercedWestEIR@sfgov.org

The table below indicates when compliance with each mitigation measure must occur. Each mitigation measure’s requirements are provided on the following pages in the Mitigation Monitoring and Reporting Program (MMRP). The MMRP for the San Francisco Recreation and Parks Department’s Phase 2, Construction Phases 2 and 3 and Operation of the Lake Merced West Project, is provided in a separate table. Note that the San Francisco Public Utilities Commission and the San Francisco Recreation and Parks Department will jointly implement Mitigation Measures M-CR-1a, M-CR-1b, and M-CR-1d.

Adopted Mitigation Measure	Period of Compliance			Compliance with Mitigation Measure Completed?
	Prior to the Start of Demolition	During Demolition and Soil Remediation	Post-construction or Operational	
Project Mitigation Measure M-CR-1a: Documentation of Historical Resources	X			
Project Mitigation Measure M-CR-1b: Video Documentation	X			
Project Mitigation Measure M-CR-1d: Oral Histories	X	X		
Project Mitigation Measure M-BI-1a: Worker Environmental Awareness Program Training	X	X		
Project Mitigation Measure M-BI-1b: Avoidance and Minimization Measures for Western Pond Turtle	X	X		
Project Mitigation Measure M-BI-6: Avoidance and Minimization Measures for Bats	X	X		
Project Mitigation Measure M-GE-5: Inadvertent Discovery of Paleontological Resources	X	X		

NOTES:

* San Francisco Public Utilities Commission and San Francisco Recreation and Parks Department to jointly implement Mitigation Measures M-CR-1a, M-CR-1b, and M-CR-1d.

Note to SFPUC: Please contact CPC.EnvironmentalMonitoring@sfgov.org to begin the environmental monitoring process prior to the submittal of your building permits to the San Francisco Department Building Inspection.

MITIGATION MONITORING AND REPORTING PROGRAM PHASE 1: SAN FRANCISCO PUBLIC UTILITIES COMMISSION – BUILDING DEMOLITION AND SOIL REMEDIATION

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC)				
HISTORIC ARCHITECTURAL RESOURCES				
<p>Mitigation Measure M-CR-1a: Documentation of Historical Resources</p> <p>Before any demolition activities within the project site, the RPD and the SFPUC shall retain a professional who meets the Secretary of the Interior’s Professional Qualification Standards for Architectural History to prepare written and photographic documentation of the Pacific Rod and Gun Club, with particular attention to the site as a cultural landscape and the contributing features including skeet fields 4–7 (including their associated high and low houses and safety fences), the rifle range building, the caretaker’s house, the clubhouse, and the shell house. The documentation shall be based on the National Park Service’s Historic American Building Survey (HABS) or the Historic American Landscapes Survey (HALS). This type of documentation is based on the Secretary of the Interior’s Standards and Guidelines for Architectural and Engineering Documentation and the National Park Service’s policy for photographic documentation, as outlined in the National Register and National Historic Landmarks Survey Photo Policy Expansion.</p> <p>The documentation shall include the following elements:</p> <ul style="list-style-type: none"> • Accurate scaled mapping and architectural descriptions. If available, scaled architectural plans shall also be included; • Photographs in large-format (4-inch by 5-inch) black-and-white negatives and 8-inch by 10-inch enlargements. Digital photography may be substituted for large-format negative photography if archived locally; 	<ol style="list-style-type: none"> 1. SFPUC and RPD (qualified historian) 2. SFPUC and RPD 3. Planning Department Preservation Staff 	<ol style="list-style-type: none"> 1. Prior to demolition 2. Prior to demolition 3. Prior to demolition 	<ol style="list-style-type: none"> 1. SFPUC and RPD (qualified historian) 2. SFPUC and RPD 3. Planning Department Preservation Staff 	<ol style="list-style-type: none"> 1. Prepare written and photographic documentation of the former Pacific Rod and Gun Club 2. Transmit such documentation to the San Francisco Planning Department and to repositories and repositories 3. Planning department preservation staff approve prior to approval of demolition permit

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) (CONTINUED)				
HISTORIC ARCHITECTURAL RESOURCES (CONTINUED)				
<ul style="list-style-type: none"> • A report containing site-specific history and appropriate contextual information. This information shall be gathered through site-specific and comparative archival research and oral history collection as appropriate; and • A print-on-demand book. The electronic Print-on-Demand book shall be made available to the public for distribution. The RPD and the SFPUC shall make the content of the historical report, historical photographs, HABS photography, measured drawings, and field notes available to the public through a preexisting print-on-demand book service. This service shall print and mail softcover books containing the aforementioned materials to members of the public who have paid a nominal fee. The RPD and the SFPUC shall not be required to pay ongoing printing fees once the book has been made available through the service. <p>The RPD and the SFPUC shall transmit such documentation to the San Francisco Planning Department and to repositories including the History Room of the San Francisco Public Library, San Francisco Heritage, the California Historical Society, the Northwest Information Center of the California Historical Information Resource System, and local or neighborhood historical societies. The qualified consultant shall determine the requested documentation type for each facility, and the RPD and the SFPUC shall conduct outreach to identify other interested repositories. All documentation shall be scoped and then shall be reviewed and approved by the planning department’s preservation staff before issuance of the demolition permit.</p>				
<p>Mitigation Measure M-CR-1b: Video Documentation</p> <p>Before any demolition activities within the project site, the RPD and the SFPUC shall retain a qualified professional to undertake video documentation of the affected historical resource and its setting. This mitigation measure would supplement the traditional HABS/HALS documentation and would enhance the collection of reference materials that would be available to the public and inform future research.</p>	1. SFPUC and RPD (qualified professional)	1. Prior to demolition	1. SFPUC and RPD	1. Undertake video documentation

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) (CONTINUED)				
HISTORIC ARCHITECTURAL RESOURCES (CONTINUED)				
<p>The documentation shall be conducted by a professional videographer with experience recording architectural resources. The professional videographer shall provide a storyboard of the proposed video recordation for review and approval by planning department preservation staff.</p> <p>The final video shall be reviewed and approved by the planning department preservation staff prior to issuance of a demolition permit for the project. Archival copies of the video documentation shall be submitted to the planning department, and the consultant shall contact the following repositories to determine whether they will request copies: the History Room at the San Francisco Public Library, San Francisco Heritage, the Prelinger Archives, and the California Historical Society.</p>	<p>2. SFPUC and RPD</p> <p>3. Planning Department Preservation Staff</p>	<p>2. Prior to demolition</p> <p>3. Prior to demolition</p>	<p>2. SFPUC and RPD</p> <p>3. Planning Department Preservation Staff</p>	<p>2. Submit video to planning department preservation staff</p> <p>3. Planning department preservation staff approve video documentation prior to approval of demolition permit</p>
<p>Mitigation Measure M-CR-1d: Oral Histories</p> <p>The RPD and the SFPUC shall retain the services of a qualified historian to undertake an oral history of the Pacific Rod and Gun Club and shall make a good-faith effort to publicize the oral history project, conduct public outreach, and identify a wide range of potential interviewees. The RPD and the SFPUC shall employ a range of measures that may include conducting interviews to allow participants to record their recollections, and/or hosting a website or providing other means for interviewees to contribute oral histories remotely. This oral history project shall consist of interviews of and recollections by members of the Pacific Rod and Gun Club if possible, and could include a video tour explaining the activities that took place on the site. The success of this effort will depend primarily on the ability of the RPD and the SFPUC to locate such persons, and on their willingness and ability to participate. Before undertaking this effort, the scope and methodology of the oral history project shall be reviewed and approved by planning department preservation staff.</p> <p>In addition to potentially being used for the onsite interpretive program, the recordings made for the oral history project shall be transcribed, indexed, and made available to the public at no charge through the planning department and other archives and repositories to allow for remote historical interpretation of the site.</p>	<p>1. SFPUC and RPD (qualified historian)</p> <p>2. SFPUC and RPD (qualified historian)</p>	<p>1. Prior to demolition</p> <p>2. Prior to demolition</p>	<p>1. SFPUC and RPD</p> <p>2. SFPUC and RPD</p>	<p>1. Develop oral histories methodology</p> <p>2. SFPUC and RPD conduct oral history recordings and make available to the public through the planning department and repositories prior to approval of demolition permit</p>

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) (CONTINUED)				
BIOLOGICAL RESOURCES				
<p>Mitigation Measure M-BI-1a: Worker Environmental Awareness Program Training.</p> <p>A project-specific Worker Environmental Awareness Program (WEAP) training shall be developed and implemented by a qualified biologist for the project and attended by all construction personnel prior to beginning work onsite. The training could consist of a recorded presentation that could be reused for new personnel. The WEAP training shall generally include but not be limited to the following:</p> <ul style="list-style-type: none"> • Applicable State and federal laws, environmental regulations, project permit conditions, and penalties for non-compliance; • Special-status animal species with potential to occur on or in the vicinity of the project site, avoidance measures, and a protocol for encountering such species including a communication chain; • Preconstruction surveys and biological monitoring requirements associated with each phase of work; • Known sensitive resource areas in the project vicinity which are to be avoided and/or protected (e.g. wetlands) as well as approved project work areas; and • Best Management Practices and their location on the project site for erosion control and/or species exclusion 	<ol style="list-style-type: none"> 1. SFPUC 2. SFPUC (qualified biologist) 3. SFPUC 	<ol style="list-style-type: none"> 1. Design 2. Prior to demolition 3. Prior to demolition 	<ol style="list-style-type: none"> 1. SFPUC project manager 2. SFPUC project manager 3. SFPUC project manager 	<ol style="list-style-type: none"> 1. Ensure contract documents include requirements for Worker Environmental Awareness Program training. 2. Prepare a project-specific biological-resources awareness training program. Include documentation of qualifications of the biologist developing the training program (e.g., resume). 3. Monitor to ensure that all personnel attend training prior to beginning work, and sign training sign-in sheet. Maintain file of sign-in sheets in project record. Report noncompliance and ensure corrective action.

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) (CONTINUED)				
BIOLOGICAL RESOURCES (CONTINUED)				
<p>Mitigation Measure M-BI-1b: Avoidance and Minimization Measures for Western Pond Turtle.</p> <p>During construction, RPD and SFPUC shall ensure a biological monitor is present during installation of exclusion fencing, during initial vegetation clearing and ground disturbance within grassland, riparian, and wetland habitats, and during all in-water construction. Also, the following measures shall be implemented:</p> <ul style="list-style-type: none"> • Within one week before construction commences, a qualified biologist shall supervise the installation of exclusion fencing along limits of vegetation removal and grading within riparian and wetland habitat as the biologist deems necessary to prevent western pond turtles from entering the work areas. Exclusion fencing may be installed with wings at the edges of locations where vegetation removal would occur within riparian and wetland vegetation to redirect species away from the work areas and back into suitable habitat that would not be disturbed by the project. This would avoid installation of fencing along the entire north (lakeside) boundary of the site if disturbance to riparian and wetland vegetation is localized to the dock and soft landing project components on the east end of the site. The construction contractor shall install CDFW-approved species exclusion fencing, with a minimum height of 3 feet above ground surface and with an additional 4–6 inches of fence material buried such that species cannot burrow under the fence. Fencing can be multipurpose silt fencing (see Mitigation Measure M-BI-3a, Restoration of Arroyo Willow Riparian Scrub and Freshwater Marsh Wetlands, below) and exclusion fencing. • Any erosion and sediment control materials used onsite shall be free of plastic monofilament material that could cause animal entanglement. • A qualified biologist shall survey the project area within 48 hours before the start of initial ground-disturbing activities and shall be present during initial vegetation clearing and ground-disturbing activities in grassland, wetland and riparian habitat within 100 yards of the shoreline. The extent of disturbance within aquatic, wetland, and riparian habitat areas to accommodate construction of in-water project 	<ol style="list-style-type: none"> 1. SFPUC 2. SFPUC (qualified biologist) 3. SFPUC (qualified biologist) 4. SFPUC (qualified biologist) 5. SFPUC (qualified biologist) 	<ol style="list-style-type: none"> 1. Design 2. Pre-construction 3. Construction 4. Construction 5. Construction 	<ol style="list-style-type: none"> 1. SFPUC 2. SFPUC 3. SFPUC 4. SFPUC 5. SFPUC 	<ol style="list-style-type: none"> 1. Ensure contract documents include requirements for Western Pond Turtle Avoidance 2. Qualified biologist supervise the installation of exclusion fencing one week prior to construction 3. Qualified biologist survey the project area within 48 hours before the start of initial ground-disturbing activities and be present during initial vegetation clearing 4. Qualified biologist present during initial vegetation clearing and other activities identified in mitigation measure. 5. If potential western pond turtles are found and cannot be avoided, implement measures specified in mitigation measure.

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) (CONTINUED)				
BIOLOGICAL RESOURCES (CONTINUED)				
<p>components shall be minimized. A qualified biologist shall be present during installation of the coffer dam around the soft landing soil remediation area and during dewatering activities.</p> <ul style="list-style-type: none"> If western pond turtles are found during construction, construction that poses a threat to the individual shall be halted in the vicinity as determined by the qualified biologist. If possible, the individual shall be allowed to move out of the work area of its own volition (e.g., if it is near the exclusion fence that can be temporarily removed to let it pass). The qualified biologist shall relocate turtles to the nearest suitable habitat should they not leave the work area of their own accord. Construction shall resume after the individual is out of harm's way. If western pond turtles occur repeatedly onsite after the exclusion fencing has been installed, a qualified biologist shall initiate preconstruction sweeps of the project site for this species prior to start of construction on a daily basis and thereafter throughout the duration of the project. Excavations deeper than 6 inches shall have a sloping escape ramp of earth or a wooden plank installed at a 3:1 rise. Openings, such as pipes, where western pond turtles might seek refuge shall be covered when not in use. All trash that may attract predators or hide western pond turtles shall be properly contained each day, removed from the worksite, and disposed of regularly. <p>Following site construction, the contractor shall remove all trash and construction debris from the work areas.</p>	6. SFPUC	6. Construction	6. SFPUC	6. Monitor regularly to ensure that the contractor implements avoidance and minimization measures in contract documents. Report noncompliance and ensure corrective action.
<p>Mitigation Measure M-BI-6: Avoidance and Minimization Measures for Bats</p> <p>A qualified biologist with at least a four-year degree and professional experience in biological sciences and related resource management activities, who is experienced with bat surveying techniques (including auditory sampling methods), behavior, roosting habitat, and identification of local bat species, shall conduct a preconstruction survey within one year prior to the start of construction, during the period when bat maternity roosts would be in use (April 15 – August 15) to identify</p>	1. SFPUC (qualified biologist)	1. Design	1. SFPUC	1. Conduct preconstruction bat survey of all potential bat habitat onsite during the period April 15 to August 15 and prepare report prior to demolition.

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) (CONTINUED)				
BIOLOGICAL RESOURCES (CONTINUED)				
<p>potential bat habitat and potentially active maternity roost sites in the project area. If the preconstruction survey does not identify bat habitat or signs of potentially active bat roosts within the project area such as guano, urine staining, or dead bats, then no further action is required. A brief, written report documenting the results of the survey shall be provided to the planning department.</p> <p>The following measures shall be implemented if the preconstruction survey identifies potential roosting habitat or potentially active bat roosts in buildings to be demolished under the project:</p> <ul style="list-style-type: none"> In areas identified as potential roosting habitat during the preconstruction survey, building/structure demolition shall avoid the bat maternity roosting season and period of winter <i>torpor</i> (a state of decreased physiological activity with reduced body temperature and metabolic rate) when bats are most vulnerable. Building/structure demolition shall instead be conducted when bats are active and able to flee from disturbance activities, approximately between the periods of March 1 to April 15 and August 15 to October 15. Depending on the preconstruction survey outcomes discussed below, the qualified biologist shall conduct additional preconstruction surveys of potential bat roost sites identified during the initial preconstruction survey no more than 14 days prior to building/structure demolition. If active bat roosts or evidence of roosting are identified during preconstruction surveys, a no-disturbance buffer shall be established around roost sites until the qualified biologist determines they are no longer active. The size of the no-disturbance buffer shall be determined by the qualified biologist and would depend on the species present, roost type, and existing screening around the roost site (such as dense vegetation or a building), as well as the type of construction activity that would occur around the roost site. If maternity or hibernation roosts are detected during these surveys, appropriate species- and roost-specific avoidance and protection measures shall be developed by the qualified biologist. Such measures may include postponing the removal of occupied buildings or other structures, establishing exclusionary work buffers while the 	2. SFPUC	2. Design	2. SFPUC	2. If potential roosting habitat of active bat roosts are found, ensure contract documents include avoidance and minimization measures for bats and maternity roosts.
	3. SFPUC, qualified biologist	3. Construction	3. SFPUC	3. Monitor to ensure that the contractor implements avoidance and minimization.

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) (CONTINUED)				
BIOLOGICAL RESOURCES (CONTINUED)				
<p>roost is active (e.g., 100-foot no-disturbance buffer), or other avoidance measures depending on the species present, their protection status, and roost type. If a maternity roost of any size supporting any bat species is detected during surveys, an avoidance buffer, as determined by the qualified biologist, shall be maintained until the young bats are flying. The qualified biologist shall determine the extent of protective buffers, and buffer placement would depend on: the species' sensitivity to disturbance, which can vary among species; the level of noise or construction disturbance; the line-of-sight between the roost and the disturbance; ambient noise (baseline noise) and other disturbances under existing conditions; and consideration of other topographical or artificial barriers.</p> <ul style="list-style-type: none"> • The qualified biologist shall be present during building/structure demolition if potential bat roosting habitat or active bat roosts are present and roosts do not contain young. Buildings/structures with active roosts shall be disturbed only under clear weather conditions when precipitation is not forecast for three days and when daytime temperatures are at least 50 degrees Fahrenheit. • Removal of buildings/structures containing or suspected to contain active bat roosts shall be dismantled under the supervision of the qualified biologist in the evening and after bats have emerged from the roost to forage. Buildings/structures shall be partially dismantled to significantly change the roost conditions, causing bats to abandon and not return to the roost. 				
PALEONTOLOGICAL RESOURCES				
<p>Mitigation Measure M-GE-5: Inadvertent Discovery of Paleontological Resources</p> <p><i>Worker Awareness Training.</i> Prior to commencing construction, and ongoing throughout ground disturbing activities (e.g., excavation, utility installation), the RPD and SFPUC and/or their designee shall ensure that all project construction workers are trained on the contents of the Paleontological Resources Alert Sheet, as provided by the planning department. The Paleontological Resources Alert Sheet shall be</p>	1. SFPUC	1. Design	1. SFPUC	1. Ensure contract documents include requirements for Worker Paleontological Resources Training

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) (CONTINUED)				
PALEONTOLOGICAL RESOURCES (CONTINUED)				
<p>prominently displayed at the construction site during ground disturbing activities for reference regarding potential paleontological resources.</p> <p>In addition, the RPD and SFPUC shall inform the contractor and construction personnel of the immediate stop work procedures and other procedures to be followed if bones or other potential fossils are unearthed at the project site. Should new workers that will be involved in ground disturbing construction activities begin employment after the initial training has occurred, the construction supervisor shall ensure that they receive the worker awareness training as described above.</p> <p>The RPD and SFPUC shall complete the standard form/affidavit confirming the timing of the worker awareness training to the Environmental Review Officer (ERO). The affidavit shall confirm the project's location, the date of training, the location of the informational handout display, and the number of participants. The affidavit shall be transmitted to the ERO within five business days of completion of excavation.</p> <p><i>Paleontological Resource Discoveries.</i> In the event of the discovery of an unanticipated paleontological resource during project construction, ground disturbing activities shall temporarily be halted within 25 feet of the find until the discovery is examined by a qualified paleontologist meeting the qualifications stated by the Society of Vertebrate Paleontology standards (SVP 2010). Work within the sensitive area shall resume only when deemed appropriate by the qualified paleontologist in consultation with the ERO.</p> <p>The qualified paleontologist shall determine: 1) if the discovery is scientifically significant; 2) the necessity for involving other responsible or resource agencies and stakeholders, if required or determined applicable; and 3) methods for resource documentation or recovery. If a paleontological resource assessment results in a determination that the resource is not scientifically important, this conclusion shall be documented in a Paleontological Evaluation Letter to demonstrate compliance with applicable statutory requirements (e.g., Federal Antiquities Act of 1906, CEQA Guidelines Section 15064.5, California</p>	<p>2. SFPUC</p> <p>3. SFPUC (qualified paleontologist)</p> <p>4. SFPUC (qualified paleontologist)</p> <p>5. SFPUC</p>	<p>2. Pre-construction</p> <p>3. Construction</p> <p>4. Construction</p> <p>5. Construction</p>	<p>2. SFPUC</p> <p>3. SFPUC</p> <p>4. SFPUC</p> <p>5. SFPUC</p>	<p>2. Provide Paleontological Resources training to construction workers.</p> <p>3. If paleontological resource are found, implement measures specified in mitigation measure.</p> <p>4. Monitor to ensure that the contractor implements avoidance and minimization measures in contract documents. Report noncompliance and ensure corrective action.</p> <p>5. Submit report to ERO, if needed.</p>

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) (CONTINUED)				
PALEONTOLOGICAL RESOURCES (CONTINUED)				
<p>Public Resources Code Chapter 17, Section 5097.5, Paleontological Resources Preservation Act 2009). The Paleontological Evaluation Letter shall be submitted to the ERO for review within 30 days of the discovery.</p> <p>If the qualified paleontologist determines that a paleontological resource is of scientific importance, and there are no feasible measures to avoid disturbing this paleontological resource, the qualified paleontologist shall prepare a Paleontological Mitigation Program. The mitigation program shall include measures to fully document the resource of scientific importance and to determine if recovery is appropriate. The qualified paleontologist shall submit the mitigation program to the ERO for review and approval within 10 business days of the discovery. Upon approval by the ERO, ground disturbing activities in the project area shall resume and be monitored as determined by the qualified paleontologist for the duration of such activities.</p> <p>The mitigation program shall include: 1) procedures for construction monitoring at the project site; 2) fossil preparation and identification procedures; 3) curation of paleontological resources of scientific importance into an appropriate repository; and 4) preparation of a Paleontological Resources Report (report or paleontology report) at the conclusion of ground disturbing activities. The report shall include dates of field work, results of monitoring, fossil identifications to the lowest possible taxonomic level, analysis of the fossil collection, a discussion of the scientific significance of the fossil collection, conclusions, locality forms, an itemized list of specimens, and a repository receipt from the curation facility.</p> <p>The SFPUC (for demolition and soil remediation) or RPD (for all other construction) shall be responsible for the preparation and implementation of the mitigation program, in addition to any costs necessary to prepare and identify collected fossils, and for any curation fees charged by the paleontological repository. The paleontology report shall be submitted to the ERO for review within 30 business days from conclusion of ground disturbing activities, or as negotiated following consultation with the ERO.</p>				

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES				
1. SEISMIC AND GEOTECHNICAL STUDIES				
All projects will prepare a characterization of the soil types and potential for liquefaction, subsidence, landslide, fault displacement, and other geological hazards at the project site and will be engineered and designed as necessary to minimize risks to safety and reliability due to such hazards. As necessary, geotechnical investigations will be performed.	1. SFPUC	1. Design	1. SFPUC	1. Ensure contract documents include and require implementation of recommendations from geotechnical studies.
	2. SFPUC	2. Design	2. SFPUC	2. Monitor to ensure that the contractor implements measures in contract documents, report noncompliance, and ensure corrective action.
2. AIR QUALITY				
All projects within San Francisco City (the City) limits will comply with the Construction Dust Control Ordinance. All projects outside the City will comply with applicable local and State dust control regulations. All projects within City limits will comply with the Clean Construction Ordinance. Projects outside City limits will comply with San Francisco or other applicable thresholds for health risks. All projects, both within and outside of City limits, will comply with either San Francisco or other applicable thresholds for construction criteria air pollutants. To meet air quality thresholds, all projects (as necessary) will implement air quality controls to be tailored to the project, such as using high tier engines, Verified Diesel Emissions Control Strategies (VDECS) such as diesel particulate filters, customized construction schedules and procedures, and low emissions fuel.	1. SFPUC	1. Design	1. SFPUC	1. Ensure contract documents include dust control ordinance and clean construction ordinance requirements.
	2. SFPUC	2. Construction	2. SFPUC	2. Monitor to ensure that the contractor implements measures in contract documents, report noncompliance, and ensure corrective action.

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
3. WATER QUALITY				
All projects will implement erosion and sedimentation controls to be tailored to the project site such as, fiber rolls and/or gravel bags around storm drain inlets, installation of silt fences, and other such measures sufficient to prevent discharges of sediment and other pollutants to storm drains and all surface waterways, such as San Francisco Bay, the Pacific Ocean, water supply reservoirs, wetlands, swales, and streams. As required based on project location and size, a Stormwater Control Plan (in most areas of San Francisco) or a Stormwater Pollution Prevention Plan (SWPPP) (outside of San Francisco and in certain areas of San Francisco) will be prepared. If uncontaminated groundwater is encountered during excavation activities, it will be discharged in compliance with applicable water quality standards and discharge permit requirements.	1. SFPUC	1. Design	1. SFPUC	1. Ensure contract documents include erosion and sediment controls.
	2. SFPUC	2. Construction	2. SFPUC	2. Monitor to ensure that the contractor implements measures in contract documents, report noncompliance, and ensure corrective action.
4. TRAFFIC				
All projects will implement traffic control measures sufficient to maintain traffic and pedestrian circulation on streets affected by construction of the project. Traffic control measures may include, but not be limited to, flaggers and/or construction warning signage of work ahead; scheduling truck trips during non-peak hours to the extent feasible; maintaining access to driveways, private roads, and off-street commercial loading facilities by using steel trench plates or other such method; and coordination with local emergency responders to maintain emergency access. For projects in San Francisco, the measures will also, at a minimum, be consistent with the requirements of San Francisco Municipal Transportation Agency (SFMTA)'s Blue Book. Any temporary rerouting of transit vehicles or relocation of transit facilities would be coordinated with the applicable transit agency, such as SFMTA Muni Operations in San Francisco. All Projects will obtain encroachment permits from the applicable jurisdiction for work in public roadways.	1. SFPUC	1. Design	1. SFPUC	1. Ensure contract documents include traffic control measures and consistency with SFMTA blue book
	2. SFPUC	2. Construction	2. SFPUC	2. Monitor to ensure that the contractor implements measures in contract documents, report noncompliance, and ensure corrective action.

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
5. NOISE				
All projects will comply with local noise ordinances regulating construction noise. The SFPUC shall undertake measures to minimize noise disruption to nearby neighbors and sensitive receptors during construction. These efforts could include using best available noise control technologies on equipment (i.e., mufflers, ducts, and acoustically attenuating shields), locating stationary noise sources (i.e., pumps and generators) way from sensitive receptors, erecting temporary noise barriers, and other such measures.	1. SFPUC	1. Design	1. SFPUC	1. Ensure contract documents include requirements of local noise ordinances
	2. SFPUC	2. Construction	2. SFPUC	2. Implement measures to minimize noise disruption
	3. SFPUC	3. Construction	3. SFPUC	3. Monitor to ensure that the contractor implements measures in contract documents, report noncompliance, and ensure corrective action.
6. HAZARDOUS MATERIALS				
Where there is reason to believe that site soil or groundwater that will be disturbed may contain hazardous materials, the SFPUC shall undertake an assessment of the site in accordance with any applicable local requirements (e.g., Maher Ordinance) or using reasonable commercial standards (e.g., Phase I and Phase II assessments, as needed). If hazardous materials will be disturbed, the SFPUC shall prepare a plan and implement the plan for treating, containing or removing the hazardous materials in accordance with any applicable local, State and federal regulations so as to avoid any adverse exposure to the material during and after construction. In addition, any unidentified hazardous materials encountered during construction likewise will be characterized and appropriately treated, contained or removed to avoid any adverse exposure. Measures will also be implemented to prevent the release of hazardous materials used during construction, such as storing them pursuant to manufacturer recommendation, maintaining spill kits onsite, and containing any spills that occur to the extent safe and feasible followed by collection and disposal in accordance with applicable laws.	1. SFPUC	1. Design/ Construction	1. SFPUC	1. Implement Soil Management Plan approved for site by Regional Water Quality Control Board

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
6. HAZARDOUS MATERIALS (CONTINUED)				
SFPUC will report spills of reportable quantity to applicable agencies (e.g., the Governor's Office of Emergency Services).				
7. BIOLOGICAL RESOURCES				
All project sites and the immediately surrounding area will be screened to determine whether biological resources may be affected by construction. A qualified biologist will also carry out a survey of the project site, as appropriate, to note the general resources and identify whether habitat for special-status species and/or migratory birds, are present. In the event further investigation is necessary, the SFPUC will comply with all local, State, and federal requirements for surveys, analysis, and protection of biological resources (e.g., Migratory Bird Treaty Act, federal and State Endangered Species Acts, etc.). If necessary, measures will be implemented to protect biological resources, such as installing wildlife exclusion fencing, establishing work buffer zones, installing bird deterrents, monitoring by a qualified biologist, and other such measures. If tree removal is required, the SFPUC would comply with any applicable tree protection ordinance.	<p>Nesting bird surveys shall be conducted prior to construction in accordance with this measure and any work buffer zones, bird deterrents, monitoring, and other such measures shall be implemented as needed. Biological resources surveys required by this measure were conducted for the EIR. Additional biological resources requirements are detailed in the mitigation measures described above:</p> <p>Mitigation Measure M-BI-1a: Worker Environmental Awareness Program Training</p> <p>Mitigation Measure M-BI-1b: Avoidance and Minimization Measures for Western Pond Turtle</p> <p>Mitigation Measure M-BI-6: Avoidance and Minimization Measures for Bats</p>			
8. VISUAL AND AESTHETIC CONSIDERATIONS				
All project sites will be maintained in a clean and orderly state. Construction staging areas will be sited away from public view where possible. Nighttime lighting will be directed away from residential areas and have shields to prevent light spillover effects. Upon project completion, project sites on SFPUC-owned lands will be returned to their general pre-project condition, including re-grading of the site and re-vegetation or re-paving of disturbed areas to the extent this is consistent with SFPUC's Integrated Vegetation Management Policy. However, where encroachment has occurred on SFPUC-owned lands, the encroaching features may not be restored if inconsistent with the SFPUC policies applicable to management	1. SFPUC	1. Construction	1. SFPUC	1. Maintain project sites

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
8. VISUAL AND AESTHETIC CONSIDERATIONS (CONTINUED)				
of its property. Project sites on non-SFPUC land will be restored to their general pre-project condition so that the owner may return them to their prior use, unless otherwise arranged with the property owner.	2. SFPUC	2. Construction	2. SFPUC	2. Return lands to pre-project condition
9. CULTURAL RESOURCES				
<p>All projects that will alter a building or structure, produce vibrations, or include soil disturbance will be screened to assess whether cultural resources are or may be present and could be affected, as detailed below. Archeological Resources. No archeological review is required for a project that will not entail ground disturbance. Projects involving ground disturbance will undergo screening for archeological sensitivity as described below and implement, as applicable, SFPUC's Standard Archeological Measures I (Discovery), II (Monitoring) and III (Testing/Data Recovery) per the Cultural Resources Attachments. Standard Construction Measure I will be implemented on all projects involving ground disturbance and Standard Archeological Measures II and III will be implemented based on the screening process described below for projects assessed as having the potential to encounter archeological sites and/or if an archeological discovery occurs during construction.</p> <p>Projects involving ground disturbance will initially be screened to identify whether there is demonstrable evidence of prior ground disturbance in the project site to the maximum vertical and horizontal extent of the current project's planned disturbance. For projects where prior complete ground disturbance has occurred throughout areas of planned work, SFPUC will provide evidence of the previous disturbance in the Categorical Exemption application and no further archeological screening will be required.</p> <p>For projects that are on previously undisturbed sites or where the depth/extent of prior ground disturbance cannot be documented, or where the planned project-related ground disturbance will extend beyond the depth/extent of prior ground disturbance, additional screening will be carried out as detailed below and shown on the attached flow chart titled "SFPUC Standard Construction Measure #9</p>	<p>Archeological Resources requirements met by implementation of the following standard measures, detailed below.</p> <p>SFPUC Archeological Measure I (Archeological Discovery)</p> <p>SFPUC Archeological Measure II (Archeological Monitoring)</p>			

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
9. CULTURAL RESOURCES (CONTINUED)				
<p>Archeological Assessment Process". The additional screening will be conducted by the SFPUC's qualified archeologist (defined as meeting the Secretary of the Interior's Professional Qualifications Standards [36 C FR 61]) and, if a consultant, selected in consultation with the San Francisco Planning Department's Environmental Review Officer (ERO) and meeting criteria or specialization required for the resource type as identified by the ERO.</p> <ol style="list-style-type: none"> 1. The SFPUC qualified archeologist will conduct an archival review for the project site, including review of Environmental Planning's (EP's) archeological GIS data and/or a records search of the California Historical Resources Information System (CHRIS) and other archival sources as appropriate. The qualified archeologist will also conduct an archeological field survey of the project site if, in the archeologist's judgment, this is warranted by site conditions. Based on the results, the archeologist will complete and submit to EP a Preliminary Archeological Checklist (PAC) (version dated 4/2015, to be amended in consultation with the ERO as needed). The PAC will include recommendations for the need for archeological testing, additional research and/or treatment measures consistent with Archeological Measures I, II, and III, to be implemented by the project to protect and/or treat significant archeological resources identified as being present within the site and potentially affected by the project. 2. The EP Archeologist (for projects within the City) or the ERO's archeological designee (for projects outside the City) will then conduct a Preliminary Archeological Review (PAR) of the PAC and other sources as warranted; concur with the PAC recommendations; and/or amend the PAC in consultation with the SFPUC archeologist or archeological consultant to require additional research, reports, or treatment measures as warranted based on his/her professional opinion. 				

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
9. CULTURAL RESOURCES (CONTINUED)				
<p>3. The SFPUC shall implement the PAC/PAR recommendations prior to and/or during project construction consistent with Standard Archeological Measures I, II, and III, and shall consult with the EP Archeologist in selecting an archeological consultant, as needed, to implement these measures.</p> <p>4. Ground disturbing activities in archeologically sensitive areas, as identified through the above screening, will not begin until required preconstruction archeological measures of the PAC/PAR (e.g., preparation of an Archeological Monitoring Plan, Archeological Treatment Plan, and/or an Archeological Research Design and Data Recovery Plan) have been implemented.</p> <p>Historic (Built Environment) Resources. For projects within the City that include activities with the potential for direct or indirect effects to historic buildings or structures, initial CEQA screening will include a review, for the project footprint and up to one parcel surrounding the footprint of CCSF's online planning map, all relevant survey data, preservation address files, and other pertinent sources for previously-identified, historically significant buildings and building and structures more than 45 years old that have not been previously evaluated. For projects outside of the City, initial CEQA screening will include a records search of EP's CCSF historical resources data, CHRIS, and other pertinent sources for historically significant or potentially significant buildings and structures older than 45 years.</p> <p>For projects that would modify an existing building or structure that has been determined by EP as being a significant historical resource (i.e., appears eligible to qualify for the CRHR), or that would introduce new aboveground facilities in the vicinity of a significant historical resource, or that would affect previously unevaluated buildings or structures more than 45 years old, the SFPUC will retain a qualified architectural historian (defined as meeting the Secretary of the Interior's Professional Qualification standards and, if a consultant, also selected in consultation with the ERO) to conduct a historical resource evaluation (HRE). SFPUC will submit the project description and the HRE to the CCSF Planning</p>	<p>Historic (Built Environment) Resources requirements met by implementation of the following measures, detailed above and in MMRP Phase 2:</p> <p>Mitigation Measure M-CR-1a: Documentation of Historical Resources</p> <p>Mitigation Measure M-CR-1b: Video Documentation</p> <p>Mitigation Measure M-CR-1c: Interpretive Program (by RPD)</p> <p>Mitigation Measure M-CR-1d: Oral Histories</p>			

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
9. CULTURAL RESOURCES (CONTINUED)				
<p>Department Preservation Planner or to the ERO's-designated qualified architectural historian to assess potential effects. Where the potential for the project to have adverse effects on historic buildings or structures is identified, the CCSF Planning Department Preservation Planner or the ERO's designee will consult with SFPUC to determine if the project can be conducted as planned or if the project design can be revised to avoid the significant impact, and will comply with applicable procedures set forth in Historic Architectural Resource Measure I. If these options are not feasible, the project will need to undergo further review with EP and mitigation may be required. If so, the project would not qualify for a Categorical Exemption from CEQA review.</p> <p>Where construction will take place in proximity to a building or structure identified as a significant historical resource but would not otherwise directly affect it, the SFPUC will implement protective measures, such as but not limited to, the erection of temporary construction barriers to ensure that inadvertent impacts to such buildings or structures are avoided.</p>				
SFPUC ARCHEOLOGICAL MEASURE I (ARCHEOLOGICAL DISCOVERY)				
<p>Prior to ground disturbing activities:</p> <p>A. Alert Sheet. The SFPUC shall, prior to any soils disturbing activities, distribute the Planning Department archeological resource "ALERT" sheet to each project contractor or vendor involved in project-related soils disturbing activities; ensure that each contractor circulates it to all field personnel; and provide the Environmental Review Officer (ERO) with a signed affidavit from each contractor confirming distribution to all field personnel.</p>	<p>1. SFPUC</p> <p>2. SFPUC</p> <p>3. SFPUC</p>	<p>1. Design</p> <p>2. Pre-construction</p> <p>3. Pre-construction</p>	<p>1. SFPUC</p> <p>2. SFPUC</p> <p>3. SFPUC</p>	<p>1. Ensure contract documents include ALERT sheet</p> <p>2. SFPUC distribute sheet to contractor and ensure circulation to field staff</p> <p>3. Provide ERO with signed affidavit from contractor</p>

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
SFPUC ARCHEOLOGICAL MEASURE I (ARCHEOLOGICAL DISCOVERY) (CONTINUED)				
<p>Upon making a discovery:</p> <p>A. Work Suspension. Should a potential archeological resource be encountered during project soils disturbing activity, with or without an archeological monitor present, the project Head Foreman shall immediately suspend soils disturbing activities within 50 feet (15 meters) of the discovery, protect the find from further disturbance, and notify the SFPUC Project Manager (PM) and/or Environmental Project Manager (EPM), who shall immediately notify the ERO for further consultation.</p> <p>B. Qualified Archeologist. All archeological work conducted under this measure shall be performed by an archeologist who meets the Secretary of the Interior's Professional Qualifications Standards (36-CFR 61); consultants will be selected in consultation with the ERO and meeting the criteria or specialization required for the resource type as identified by the ERO in a manner consistent with SFPUC's on-call contracting requirements.</p> <p>C. Assessment and Additional Measures. If the ERO determines that the discovery is a potential archeological/historical resource, the archeologist, in consultation with the ERO, shall document the find, evaluate based on available information whether it qualifies as a significant historical resource under the CEQA criteria, and provide recommendations for additional treatment as warranted. The ERO will consult with SFPUC and the qualified archeologist on these recommendations and may require implementation of additional measures as set forth below in Archeological Measures II and 111, such as preparation and implementation of an Archeological Monitoring Plan, an Archeological Testing Plan, and/or an Archeological Data Recovery Plan, and including associated research designs, descendant group consultation, other reporting, curation, and public interpretation of results.</p>	<p>4. SFPUC</p> <p>5. SFPUC, qualified archeologist</p> <p>6. Qualified archeologist</p> <p>7. SFPUC</p>	<p>4. Construction</p> <p>5. Construction</p> <p>6. Construction</p> <p>7. Construction</p>	<p>4. SFPUC</p> <p>5. SFPUC, ERO</p> <p>6. SFPUC, ERO</p> <p>7. SFPUC</p>	<p>4. Upon discovery, suspend activity and notify SFPUC.</p> <p>5. ERO consult with SFPUC and implement qualified archeologist recommendations</p> <p>6. Qualified archeologist draft and finalize archeological reports</p> <p>7. ERO approve report and distribute to CHRIS</p>

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
SFPUC ARCHEOLOGICAL MEASURE I (ARCHEOLOGICAL DISCOVERY) (CONTINUED)				
<p>D. Report Reviews. All plans and reports prepared by an archeological consultant, as specified herein, shall be submitted first and directly to the ERO for review and comment with a copy to the SFPUC and shall be considered draft reports subject to revision until final approval by the ERO.</p> <p>E. Draft and Final Archeological Resources Reports. For projects in which a significant archeological resource is encounter and treated during project implementation (see Archeological Measures II and III), the archeological consultant shall submit a draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken, research questions addressed, and research results. Information that may put at risk any archeological resource shall be provided in a separate, removable insert within the draft final report. Once approved by the ERO, copies of the FARR shall be distributed as follows: two copies to the applicable California Historic Information System Information Center (CHRIS), one copy to each descendant group involved in the project, and documentation to the San Francisco Planning Department of transmittal of the above copies. In addition, the Planning Department shall be provided one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR, which shall include copies of any formal site recordation forms (CA DPR 523 series) and/or National Register of Historic Places/California Register of Historical Resources nominations.</p> <p>F. Other Reports. In instances of high public interest or interpretive value, the ERO may require different or additional final report content, format, and distribution than that presented above.</p> <p>G. Human Remains, Associated or Unassociated Funerary Objects. SFPUC shall ensure that human remains and associated or unassociated funerary objects discovered during any soils disturbing</p>				

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
SFPUC ARCHEOLOGICAL MEASURE I (ARCHEOLOGICAL DISCOVERY) (CONTINUED)				
<p>activity are treated in compliance with applicable State and federal laws. In the event of the discovery of potential human remains, the construction contractor shall ensure that construction activity within 50 feet of the find is halted and the SFPUC PM, EPM, ERO, and the County Coroner are notified immediately. If the Coroner determines that the remains are of Native American origin, he/she will notify the California State Native American Heritage Commission. Subsequent consultation on and treatment of the remains will be conducted consistent with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(d), in consultation with the ERO.</p> <p>H. Consultation with Descendant Communities. Consistent with AB 52 requirements, if requested, the SFPUC shall provide opportunities for Native American descendant groups to provide input during project planning for projects that may affect potential Tribal Cultural Resources. In addition, on discovery during construction of an archeological site associated with descendant Native Americans, the Overseas Chinese, or other descendant group, an appropriate representative of the descendant group shall be contacted by SFPUC at the direction of the ERO. SFPUC will offer this representative the opportunity to monitor archeological field investigations of the site and to consult with the ERO regarding the appropriate treatment and, if applicable, interpretation of the site and the recovered materials.</p> <p>I. Construction Delays. Archeological monitoring and/or data recovery programs required by this measure may suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if this is the only feasible means to reduce potential effects on a significant archeological find to a less-than-significant level.</p>				

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
SFPUC ARCHEOLOGICAL MEASURE II (ARCHEOLOGICAL MONITORING)				
<p>A. Archeological Monitoring Plan (AMP). Where an archeological field investigation to identify expected buried or submerged resources cannot reasonably be carried out during project planning/ environmental review (for example, where definitive determination would require extensive street opening prior to construction), prior to any project-related soils-disturbing activities the qualified archeologist identified under Archeological Measure I.C. will consult with SFPUC and the ERO to develop an Archeological Monitoring Plan (AMP). The AMP which will be implemented in conjunction with soil-disturbing activities during construction. Preparation and implementation of an AMP also may be required based on the results of pre-construction archeological testing or upon a discovery during construction.</p> <p>The AMP shall include the following elements, at minimum:</p> <ul style="list-style-type: none"> • Historical context and research design for assessment of resource types likely to be encountered; • Project activities to be archeologically monitored and intensity of monitoring of each type and location of project construction activity; and • Procedures for the documentation, significance and integrity assessment, treatment, interpretation and reporting of the types of resources likely to be encountered. <p>B. Reporting. Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO at the end of construction (See Archeological Measure I.E [Report Reviews] and I.F. [Final Archeological Research Report]).</p>	<p>1. SFPUC (qualified archeologist)</p> <p>2. SFPUC (qualified archeologist)</p>	<p>1. Construction</p> <p>2. Post-construction</p>	<p>1. SFPUC</p> <p>2. SFPUC</p>	<p>1. Qualified archeologist consult with SFPUC and ERO to develop AMP</p> <p>2. Archeological consultant submit AMP to ERO at end of construction</p>

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
SFPUC ARCHEOLOGICAL MEASURE II (ARCHEOLOGICAL MONITORING) (CONTINUED)				
<p>C. Monitoring Authorities</p> <ul style="list-style-type: none"> The archeological monitor will have the authority to halt construction activity at the location of a suspected resource for inspection, documentation, and assessment of the need for further measures as set forth in Archeological Measure III. The Archeological Monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis. The Archeological Monitor(s) shall be present on the project site according to a schedule identified in the AMP, subject to modification upon ERO concurrence, based on findings. <p>D. Testing/Data Recovery. In the event of a discovery during construction, if the ERO and archeological consultant determine that the discovery is a significant resource (that is, a resource that meets the eligibility criteria of the California Register of Historic Resources or qualifies as a unique archeological resource) that will be adversely affected (that is, where the project would result in loss of data potential) or that additional investigation is required to make this determination, all applicable elements of Archeological Measure III (Archeological Testing/Data Recovery) also will be implemented.</p>				
SFPUC ARCHEOLOGICAL MEASURE III (TESTING/DATA RECOVERY)				
<p>The following provisions apply prior to or during construction when a significant archaeological resource (as defined in Measure M.D) or an archeological resource of undetermined significance is expected to be present in the work area and the ERO, in consultation with the qualified archeologist, determines that an archeological field investigation is needed to determine: a) the presence of an archeological resource, b) whether it retains depositional integrity, and c) whether it qualifies as a legally significant resource under CEQA criteria. All archeological work under this Measure will be carried out by a qualified archeologist as identified in Archeological Measure I.C. Per Archeological Measure I.J,</p>	<ol style="list-style-type: none"> SFPUC (qualified archeologist) SFPUC (qualified archeologist) SFPUC 	<ol style="list-style-type: none"> Construction Construction Construction 	<ol style="list-style-type: none"> SFPUC SFPUC SFPUC 	<ol style="list-style-type: none"> Submit Archeological Testing Program to ERO Implement Archeological Testing Program and submit report to ERO Evaluate feasibility of preserve in place

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
SFPUC ARCHEOLOGICAL MEASURE III (TESTING/DATA RECOVERY)				
<p>implementation of this measure shall not exceed four weeks except at the direction of the ERO and only if this is the only feasible means to reduce potential effects on a significant archeological find to a less-than-significant level.</p> <p>Archeological Testing Program. If an archeological investigation is required in order to verify resource location and/ or assess the significance of the resource, the archeological consultant shall consult with the ERO to prepare and implement an Archeological Testing Plan (ATP) that identifies:</p> <ul style="list-style-type: none"> • Key research questions and associated data needs, • Testing/ sampling methods, and • Testing locations. <p>Results of testing shall be presented to ERO in a written report following Measure I.E. If, based on the archeological testing program, the archeological consultant finds and the ERO concurs that significant archeological resources may be present, Measures III.B and/or 11 I.C below will be implemented.</p> <p>Treatment. If the project could adversely affect a significant (CRHR-eligible) archeological resource, preservation in place is the preferred manner of mitigating impacts, as detailed in CEQA Guidelines 15126.6(b)(3)(a) and (b).</p> <p>If preservation in place is determined to be infeasible, the SFPUC at its discretion shall either:</p> <ul style="list-style-type: none"> • Re-design the proposed project so as to reduce the adverse effect to a less- than-significant level through preservation in place or other feasible measures; and/or 	4. SFPUC (qualified archeologist)	4. Construction	4. SFPUC	4. If data recovery is anticipated, submit Archeological Data Recovery Plan to ERO
	5. SFPUC (qualified archeologist)	5. Construction	5. SFPUC	5. Implement Archeological Data Recovery Plan and incorporate results into FARR, submit to ERO

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
SFPUC ARCHEOLOGICAL MEASURE III (TESTING/DATA RECOVERY)				
<ul style="list-style-type: none"> For a resource important for its association with an important event or person, or which is of demonstrable public interest for both its scientific and historical values (e.g., a submerged ship), and where feasible, preserve the resource in place with appropriate documentation; or, if not feasible to preserve in place, systematically document and/or recover for interpretive use, at the discretion of the ERO, and/or; For an archeological resource significant primarily for its data potential, design and implement an archeological data recovery program, as detailed under Measure 11 I.D, below. <p>Archeological Data Recovery Plan (ADRP). For resources for which the elected treatment is archeological data recovery, the archeological consultant, in consultation with the ERO, shall prepare and implement an ADRP. It will identify how the significant information the archeological resource is expected to contain will be recovered and preserved. Data recovery results will be reported in the FARR, as detailed in Measure I.F. The ADRP shall include the following elements:</p> <ul style="list-style-type: none"> Historic context and research design Field methods and procedures, including sampling strategy Archeological monitoring recommendations for ongoing construction Cataloguing and laboratory analysis Discard, deaccession, and curation policy Interpretive program Security measures 				

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
SFPUC HISTORIC ARCHITECTURAL RESOURCE MEASURE				
<p>A. Qualified Architectural Historian. When a building or structure that has been determined to be an historical resource is identified within a project's area of potential effects, the SFPUC will retain a qualified architectural historian (defined as meeting the Secretary of the Interior's Professional Qualification standards and, if a consultant, selected in consultation with the ERO) to conduct a historical resource evaluation (HRE).</p> <p>B. Effects Assessment. The SFPUC will submit the project description and the HRE to CCSF Planning Department Preservation Planner or to the ERO's-designated qualified architectural historian to assess potential effects. If a potential for the project to have adverse effects on historic buildings or structures is identified, the CCSF Planning Department Preservation Planner or the ERO's architectural historian designee will consult with SFPUC to determine if the project can be implemented as planned or if the project design can be revised to avoid the significant impact. If these options are not feasible, the project will need to undergo further review with EP and mitigation may be required. If so, the project may not qualify for a Categorical Exemption from CEQA review.</p> <p>C. Potential Vibration Effects</p> <ol style="list-style-type: none"> 1. Where construction takes place in proximity to a building or structure identified as a significant historical resource but would not otherwise directly affect it, the SFPUC will implement protective measures, such as, but not limited to, the erection of temporary construction barriers to ensure that inadvertent impacts to such structures are avoided. 2. For projects that will use vibratory equipment generating vibration in excess of 0.2 inches per second, peak particle velocity adjacent to historic buildings susceptible to vibration, the SFPUC will engage a qualified historic architect or historic preservation professional to document and photograph the pre-construction condition of the building and prepare a plan for monitoring the building during construction. The monitoring 	<p>Historic (Built Environment) Resources requirements met by implementation of the following measures, detailed above and in MMRP Phase 2:</p> <p>Mitigation Measure M-CR-1a: Documentation of Historical Resources</p> <p>Mitigation Measure M-CR-1b: Video Documentation</p> <p>Mitigation Measure M-CR-1c: Interpretive Program (by RPD)</p> <p>Mitigation Measure M-CR-1d: Oral Histories</p>			

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a		
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)			
SFPUC HISTORIC ARCHITECTURAL RESOURCE MEASURE (CONTINUED)			
<p>plan will be submitted to and approved by CCSF Planning Department Preservation Planner or the ERO's architectural historian designee prior to the beginning of construction and will be implemented during construction. The monitoring plan will identify how often monitoring will occur, who will undertake the monitoring, reporting requirements on vibration levels, reporting requirements on damage to adjacent historical resources during construction, reporting procedures to follow if such damage occurs, and the scope of the preconstruction survey and postconstruction conditions assessment.</p> <ol style="list-style-type: none"> 3. If any damage to a historic building or structure occurs, the SFPUC will modify activities to minimize further vibration. 4. If any damage occurs, the building will be repaired following the Secretary of the Interior's Standards for the Treatment of Historic Properties under the guidance of a qualified historic architect or historic preservation professional. <p>D. Minor Alteration of Historic Buildings or Structures</p> <ol style="list-style-type: none"> 1. If a project involves minor alterations and/or rehabilitation to a building that qualifies as an historical resource, the proposed design will be reviewed by a qualified historic preservation professional in consultation with the CCSF Planning Department Preservation Staff or the ERO's architectural historian, who shall identify modifications to project design, as needed, to avoid or minimize effects to the historic integrity of the historical resource. The assessment also will provide direction on ensuring compliance with Secretary of the Interior's Standards and Guidelines. 2. To qualify for a Categorical Exemption, the project must be modified as identified in the HRE and all work must be conducted in compliance with Secretary of the Interior's Standards under the guidance of an architectural historian such that historical integrity of the building or structure would not be compromised. 			

NOTES:

^a Definitions of MMRP Column Headings:

- *Adopted Mitigation Measures*: Full text of the mitigation measure(s) copied verbatim from the final CEQA document.
- *Implementation Responsibility*: Entity who is responsible for implementing the mitigation measure. In most cases this is the project sponsor and/or project's sponsor's contractor/consultant and at times under the direction of the planning department.
- *Mitigation Schedule*: Identifies milestones for when the actions in the mitigation measure need to be implemented.
- *Monitoring/Reporting Responsibility*: Identifies who is responsible for monitoring compliance with the mitigation measure and any reporting responsibilities. In most cases it is the Planning Department who is responsible for monitoring compliance with the mitigation measure. If a department or agency other than the planning department is identified as responsible for monitoring, there should be an expressed agreement between the planning department and that other department/agency. In most cases the project sponsor, their contractor, or consultant are responsible for any reporting requirements.
- *Monitoring Actions/Completion Criteria*: Identifies the milestone at which the mitigation measure is considered complete. This may also identify requirements for verifying compliance.

Agency Acronyms Used in Table:

ERO = (SF Planning Department) Environmental Review Officer
SFPUC = San Francisco Public Utilities Commission
RPD = San Francisco Recreation and Parks Department
SFMTA = San Francisco Municipal Transportation Agency

MITIGATION MONITORING AND REPORTING PROGRAM PHASE 2: SAN FRANCISCO RECREATION AND PARKS – CONSTRUCTION PHASES 2 AND 3 AND OPERATION OF THE LAKE MERCED WEST PROJECT

<i>Record No.:</i>	2019-014146ENV	<i>Block/Lot:</i>	7283/004
<i>Project Title:</i>	Lake Merced West Project	<i>Lot Size:</i>	11 acres
<i>Zoning:</i>	Public Use District Open Space Height and Bulk District	<i>Project Sponsor:</i>	San Francisco Recreation and Parks Department
		<i>Lead Agency:</i>	San Francisco Planning Department
		<i>Staff Contact:</i>	Julie Moore – (628) 652-7566 Julie.Moore@sfgov.org

The table below indicates when compliance with each mitigation measure must occur. Some mitigation measures span multiple periods Each mitigation measure’s requirements are provided on the following pages in the Mitigation Monitoring and Reporting Program (MMRP). The MMRP for the San Francisco Public Utilities Commission’s Phase 1 Building Demolition and Soil Remediation is provided in a separate table.

Adopted Mitigation Measure	Period of Compliance			Compliance with Mitigation Measure Completed?
	Prior to the Start of Construction*	During Construction**	Post-construction or Operational	
Project Mitigation Measure M-CR-1a: Documentation of Historical Resources (see Phase 1 MMRP)				
Project Mitigation Measure M-CR-1b: Video Documentation (see Phase 1 MMRP)				
Project Mitigation Measure M-CR-1c: Interpretative Program		X		
Project Mitigation Measure M-CR-1d: Oral Histories (see Phase 1 MMRP)				
Project Mitigation Measure M-NO-2: Noise Control Plan for Outdoor Amplified Sound			X	
Project Mitigation Measure M-BI-1a: Worker Environmental Awareness Program Training	X	X		
Project Mitigation Measure M-BI-1b: Avoidance and Minimization Measures for Western Pond Turtle	X	X		
Project Mitigation Measure M-BI-3a: Restoration of Arroyo Willow Riparian Scrub and Freshwater Marsh Wetlands	X		X	
Project Mitigation Measure M-BI-3b: Compensation for Permanent Fill of Wetlands and Waters		X	X	
Project Mitigation Measure M-BI-6: Avoidance and Minimization Measures for Bats	X	X		
Project Mitigation Measure M-GE-5: Inadvertent Discovery of Paleontological Resources	X	X		

NOTES:

* Prior to any ground disturbing activities at the project site.

** Construction is broadly defined to include any physical activities associated with construction of a development project including, but not limited to: site preparation, clearing, excavation, shoring, foundation installation, and building construction.

Note to Recreation and Parks Department: Please contact CPC.EnvironmentalMonitoring@sfgov.org to begin the environmental monitoring process prior to the submittal of your building permits to the San Francisco Department Building Inspection.

MITIGATION MONITORING AND REPORTING PROGRAM PHASE 2: SAN FRANCISCO RECREATION AND PARKS – CONSTRUCTION PHASES 2 AND 3 AND OPERATION OF THE LAKE MERCED WEST PROJECT

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/ Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO RECREATION AND PARKS (RPD)				
HISTORIC ARCHITECTURAL RESOURCES				
<p>Mitigation Measure M-CR-1c: Interpretive Program</p> <p>The RPD and the SFPUC shall facilitate the development of an interpretive program focused on the history of the project site as a recreational shooting range. The interpretive program should be developed and implemented by a qualified preservation professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner. Coordination with local artists and interested parties, including local California Native American representatives, should occur, as feasible. The primary goal of the program is to educate visitors about the property’s historical themes, associations, and lost contributing features within broader historical, social, and physical landscape contexts, including its longer and more expansive history and association with Lake Merced as a recreational and agricultural site used by many people over time, including the Ramaytush Ohlone. One possible location for interpretation would be the skeet field that is to be retained and reused as a picnic area.</p> <p>This program shall be initially outlined in a proposal for a Historic Resources Public Interpretive Plan subject to review and approval by planning department preservation staff. The plan shall include the general parameters—substance, media, and other elements—of the interpretive program, which shall include in publicly accessible areas of the project site a permanent display(s) of interpretive materials</p>	<ol style="list-style-type: none"> 1. RPD (qualified preservation professional) 2. Planning department and preservation staff 	<ol style="list-style-type: none"> 1. Pre-Construction 2. Prior to occupancy 	<ol style="list-style-type: none"> 1. RPD project manager 2. Planning department and preservation staff 	<ol style="list-style-type: none"> 1. RPD submit Interpretive Program proposal to Planning Department and Preservation Staff 2. Planning Department and Preservation Staff approve Interpretive program prior to issuance of temporary certificate of occupancy

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO RECREATION AND PARKS (RPD) (CONTINUED)				
HISTORIC ARCHITECTURAL RESOURCES (CONTINUED)				
<p>concerning the history and architectural features of the historical resource (both the site as a whole and the individual contributing buildings and features). The interpretive plan should also explore contributing to publicly accessible digital platforms.</p> <p>The detailed content, display materials, and other characteristics of such an interpretive program shall be reviewed and approved by planning department staff before the issuance of a Temporary Certificate of Occupancy.</p>				
NOISE AND VIBRATION				
<p>Mitigation Measure M-NO-2: Noise Limits for Outdoor Amplified Sound.</p> <p>The San Francisco Recreation and Parks Department shall require special event amplified noise permits to contain the following requirements:</p> <ul style="list-style-type: none"> • The special-event sponsor shall comply with noise controls and restrictions in the amplified sound event permit. • Speaker systems shall be directed away from the nearest residences to the degree feasible. • Amplified sound equipment use shall be restricted to 5 hours between 9:00 a.m. and 10:00 p.m. • Outdoor speaker systems shall be operated such that amplified event noise levels do not exceed 80 dBA at a distance of 100 feet from the equipment. • The special-event sponsor shall notify residents within 300 feet of the project site in advance of each special event. The notice shall include the phone number of an RPD contact for noise complaints. <p>The San Recreation and Park Department shall have a contact person available to respond to noise complaints, monitor noise levels to confirm compliance with permit requirements, and adjust noise levels (if needed).</p>	<ol style="list-style-type: none"> 1. RPD property manager 2. RPD property manager 	<ol style="list-style-type: none"> 1. Prior to special event 2. During event 	<ol style="list-style-type: none"> 1. RPD property manager 2. RPD park patrol 	<ol style="list-style-type: none"> 1. Ensure special event amplified noise permit document includes identified measures 2. Monitor noise and adjust noise levels if needed in response to complaint

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO RECREATION AND PARKS (RPD) (CONTINUED)				
BIOLOGICAL RESOURCES				
<p>Mitigation Measure M-BI-1a: Worker Environmental Awareness Program Training.</p> <p>A project-specific Worker Environmental Awareness Program (WEAP) training shall be developed and implemented by a qualified biologist for the project and attended by all construction personnel prior to beginning work onsite. The training could consist of a recorded presentation that could be reused for new personnel. The WEAP training shall generally include but not be limited to the following:</p> <ul style="list-style-type: none"> • Applicable State and federal laws, environmental regulations, project permit conditions, and penalties for non-compliance; • Special-status animal species with potential to occur on or in the vicinity of the project site, avoidance measures, and a protocol for encountering such species including a communication chain; • Preconstruction surveys and biological monitoring requirements associated with each phase of work; • Known sensitive resource areas in the project vicinity which are to be avoided and/or protected (e.g. wetlands) as well as approved project work areas; and • Best Management Practices and their location on the project site for erosion control and/or species exclusion 	<p>1. RPD</p> <p>2. RPD (qualified biologist)</p> <p>3. RPD</p>	<p>1. Design</p> <p>2. Prior to construction</p> <p>3. During construction</p>	<p>1. RPD project manager</p> <p>2. RPD project manager</p> <p>3. RPD and environmental compliance contractor</p>	<p>1. Ensure contract documents include requirements for Worker Environmental Awareness Program training of construction personnel.</p> <p>2. Prepare a project-specific biological-resources awareness training program. Include documentation of qualifications of the biologist developing the training program (e.g., resume).</p> <p>3. Monitor to ensure that all personnel attend training prior to beginning work, and sign training sign-in sheet. Project Manager maintain file of sign-in sheets in project record. RPD compliance contractor report noncompliance to project manager and ensure corrective action.</p>

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO RECREATION AND PARKS (RPD) (CONTINUED)				
BIOLOGICAL RESOURCES (CONTINUED)				
<p>Mitigation Measure M-BI-1b: Avoidance and Minimization Measures for Western Pond Turtle.</p> <p>During construction, RPD and SFPUC shall ensure a biological monitor is present during installation of exclusion fencing, during initial vegetation clearing and ground disturbance within grassland, riparian, and wetland habitats, and during all in-water construction. Also, the following measures shall be implemented:</p> <ul style="list-style-type: none"> • Within one week before construction commences, a qualified biologist shall supervise the installation of exclusion fencing along limits of vegetation removal and grading within riparian and wetland habitat as the biologist deems necessary to prevent western pond turtles from entering the work areas. Exclusion fencing may be installed with wings at the edges of locations where vegetation removal would occur within riparian and wetland vegetation to redirect species away from the work areas and back into suitable habitat that would not be disturbed by the project. This would avoid installation of fencing along the entire north (lakeside) boundary of the site if disturbance to riparian and wetland vegetation is localized to the dock and soft landing project components on the east end of the site. The construction contractor shall install CDFW-approved species exclusion fencing, with a minimum height of 3 feet above ground surface and with an additional 4–6 inches of fence material buried such that species cannot burrow under the fence. Fencing can be multipurpose silt fencing (see Mitigation Measure M-BI-3a, Restoration of Arroyo Willow Riparian Scrub and Freshwater Marsh Wetlands, below) and exclusion fencing. • Any erosion and sediment control materials used onsite shall be free of plastic monofilament material that could cause animal entanglement. • A qualified biologist shall survey the project area within 48 hours before the start of initial ground-disturbing activities and shall be present during initial vegetation clearing and ground-disturbing activities in grassland, wetland and riparian habitat within 100 yards of the shoreline. The extent of disturbance within aquatic, wetland, and riparian habitat areas to accommodate construction of in-water project components shall be minimized. A qualified biologist shall be present 	<ol style="list-style-type: none"> 1. RPD 2. RPD (qualified biologist) 3. RPD (qualified biologist) 4. RPD (qualified biologist) 5. RPD (qualified biologist) 	<ol style="list-style-type: none"> 1. Design 2. Pre-construction 3. Construction 4. Construction 5. Construction 	<ol style="list-style-type: none"> 1. RPD project manager 2. RPD and environmental compliance contractor 3. RPD and environmental compliance contractor 4. RPD and environmental compliance contractor 5. RPD and environmental compliance contractor 	<ol style="list-style-type: none"> 1. Ensure contract documents include requirements for Western Pond Turtle Avoidance and biological resources supervision 2. Qualified biologist supervise the installation of exclusion fencing one week prior to construction 3. Qualified biologist survey the project area within 48 hours before the start of initial ground-disturbing activities and be present during initial vegetation clearing 4. Qualified biologist present during initial vegetation clearing and other activities identified in mitigation measure. 5. If potential western pond turtles are found and cannot be avoided, contractor to implement measures specified in mitigation measure.

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO RECREATION AND PARKS (RPD) (CONTINUED)				
BIOLOGICAL RESOURCES (CONTINUED)				
<p>during installation of the coffer dam around the soft landing soil remediation area and during dewatering activities.</p> <ul style="list-style-type: none"> If western pond turtles are found during construction, construction that poses a threat to the individual shall be halted in the vicinity as determined by the qualified biologist. If possible, the individual shall be allowed to move out of the work area of its own volition (e.g., if it is near the exclusion fence that can be temporarily removed to let it pass). The qualified biologist shall relocate turtles to the nearest suitable habitat should they not leave the work area of their own accord. Construction shall resume after the individual is out of harm's way. If western pond turtles occur repeatedly onsite after the exclusion fencing has been installed, a qualified biologist shall initiate preconstruction sweeps of the project site for this species prior to start of construction on a daily basis and thereafter throughout the duration of the project. Excavations deeper than 6 inches shall have a sloping escape ramp of earth or a wooden plank installed at a 3:1 rise. Openings, such as pipes, where western pond turtles might seek refuge shall be covered when not in use. All trash that may attract predators or hide western pond turtles shall be properly contained each day, removed from the worksite, and disposed of regularly. <p>Following site construction, the contractor shall remove all trash and construction debris from the work areas.</p>	6. RPD	6. Construction	6. RPD and environmental compliance contractor	6. Construction compliance contractor or qualified biologist to monitor weekly to ensure that the contractor implements avoidance and minimization measures in contract documents. Report noncompliance to project manager and ensure corrective action.
<p>Mitigation Measure M-BI-3a: Restoration of Arroyo Willow Riparian Scrub and Freshwater Marsh Wetlands.</p> <p>Arroyo willow riparian scrub habitat and freshwater marsh wetlands temporarily affected during construction to facilitate project components or sediment remediation shall be restored in-place to pre-project conditions. A Riparian and Wetland Restoration and Mitigation Monitoring Plan shall be prepared for the affected areas, subject to approval by the appropriate regulatory agencies, and shall generally include, but not be limited to, the following:</p>	1. RPD (Qualified Biologist)	1. Along with U.S. Army Corps, Regional Water Quality Control Board, California Department of Fish and Wildlife permit applications (pre-construction)	1. RPD project manager, U.S. Army Corps, Regional Water Quality Control Board, California Department of Fish and Wildlife	1. Develop a Riparian and Wetland Restoration and Mitigation Monitoring Plan and submit to regulatory agencies prior to building permit issuance.

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO RECREATION AND PARKS (RPD) (CONTINUED)				
BIOLOGICAL RESOURCES (CONTINUED)				
<ul style="list-style-type: none"> • A final grading plan for the affected riparian scrub habitat and wetlands which would restore the topography of the affected habitat areas to pre-project conditions; • A planting plan, composed of native riparian scrub and freshwater marsh wetland plant species, consistent with these communities of Lake Merced; • A weed control plan that prevents the spread of invasive non-native plant species on the project site; • Performance criteria for the revegetated areas that establish success thresholds over a specific amount of time (typically five years) as determined by the regulatory agencies with jurisdiction over the affected areas; • A monitoring and reporting program under which progress of the revegetated areas shall be tracked to ensure survival of the mitigation plantings. The program shall document overall health and vigor of mitigation plantings throughout the monitoring period and provide recommendations for adaptive management as needed to ensure the site is successful, according to the established performance criteria. An annual report documenting monitoring results and providing recommendations for improvement throughout the year shall be provided to the regulatory agencies; and • A best management practices element describing erosion control measures to be installed around the affected areas following mitigation planting in order to avoid sediment runoff into the adjacent waters of Lake Merced. 	<p>2. RPD (Qualified Biologist)</p> <p>3. RPD (Qualified Biologist)</p>	<p>2. Post-construction</p> <p>3. Post-construction</p>	<p>2. RPD project manager and environmental compliance contractor</p> <p>3. RPD</p>	<p>2. Conduct post-construction monitoring consistent with monitoring and reporting program requirements.</p> <p>3. Prepare annual report documenting monitoring results and submit to regulatory agencies consistent with monitoring and reporting program requirements.</p>

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO RECREATION AND PARKS (RPD) (CONTINUED)				
BIOLOGICAL RESOURCES (CONTINUED)				
<p>Mitigation Measure M-BI-3b: Compensation for Permanent Fill of Wetlands and Waters.</p> <p>RPD shall provide compensatory mitigation for placement of fill associated with installation of new structures in jurisdictional wetlands, waters and riparian habitat of Lake Merced as further determined by the regulatory agencies with authority over Lake Merced during the permitting process. Compensatory mitigation shall achieve at least at a 1:1 ratio of acreage impacted to acreage created/restored/enhanced to ensure no-net-loss of wetlands, waters, and riparian habitat.</p> <p>Compensatory mitigation obligations from permanent project fill could be satisfied through on-site or off-site creation, restoration, or enhancement of waters, wetlands and/or riparian habitat, or payment into an approved mitigation bank for in-kind habitat credits, or other compensatory actions that avoid a net loss in these aquatic resources and as determined by regulatory agencies.</p>	<ol style="list-style-type: none"> 1. RPD (Qualified Biologist) 2. RPD 	<ol style="list-style-type: none"> 1. Along with U.S. Army Corps, Regional Water Quality Control Board, California Department of Fish and Wildlife permit applications (pre-construction) 2. Pre-construction 	<ol style="list-style-type: none"> 1. RPD, U.S. Army Corps, Regional Water Quality Control Board, California Department of Fish and Wildlife 2. RPD project manager and environmental compliance contractor 	<ol style="list-style-type: none"> 1. Develop compensatory mitigation that achieves at least at a 1:1 ratio of acreage impacted to acreage created/restored/enhanced to ensure no-net-loss of aquatic resources and submit to regulatory agencies along with permit applications 2. Implement compensatory mitigation prior to or during construction consistent with permit conditions.
<p>Mitigation Measure M-BI-6: Avoidance and Minimization Measures for Bats</p> <p>A qualified biologist with at least a four-year degree and professional experience in biological sciences and related resource management activities, who is experienced with bat surveying techniques (including auditory sampling methods), behavior, roosting habitat, and identification of local bat species, shall conduct a preconstruction survey within one year prior to the start of construction, during the period when bat maternity roosts would be in use (April 15 – August 15) to identify potential bat habitat and potentially active maternity roost sites in the project area. If the preconstruction survey does not identify bat habitat or signs of potentially active bat roosts within the project area such as guano, urine staining, or dead bats, then no further action is required. A brief, written report documenting the results of the survey shall be provided to the planning department.</p>	<ol style="list-style-type: none"> 1. RPD (qualified biologist) 2. RPD 3. RPD (qualified biologist) 	<ol style="list-style-type: none"> 1. Design 2. Design 3. Construction 	<ol style="list-style-type: none"> 1. RPD project manager 2. RPD project manager 3. RPD project manager 	<ol style="list-style-type: none"> 1. Conduct preconstruction bat survey of all potential bat habitat onsite during the period April 15 to August 15 and 2. Prepare report prior to construction. 3. If potential roosting habitat of active bat roosts are found, ensure contract documents include avoidance and minimization measures for bats and maternity roosts.

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO RECREATION AND PARKS (RPD) (CONTINUED)				
BIOLOGICAL RESOURCES (CONTINUED)				
<ul style="list-style-type: none"> The following measures shall be implemented if the preconstruction survey identifies potential roosting habitat or potentially active bat roosts in buildings to be demolished under the project: In areas identified as potential roosting habitat during the preconstruction survey, building/structure demolition shall avoid the bat maternity roosting season and period of winter <i>torpor</i> (a state of decreased physiological activity with reduced body temperature and metabolic rate) when bats are most vulnerable. Building/structure demolition shall instead be conducted when bats are active and able to flee from disturbance activities, approximately between the periods of March 1 to April 15 and August 15 to October 15. Depending on the preconstruction survey outcomes discussed below, the qualified biologist shall conduct additional preconstruction surveys of potential bat roost sites identified during the initial preconstruction survey no more than 14 days prior to building/structure demolition. If active bat roosts or evidence of roosting are identified during preconstruction surveys, a no-disturbance buffer shall be established around roost sites until the qualified biologist determines they are no longer active. The size of the no-disturbance buffer shall be determined by the qualified biologist and would depend on the species present, roost type, and existing screening around the roost site (such as dense vegetation or a building), as well as the type of construction activity that would occur around the roost site. If maternity or hibernation roosts are detected during these surveys, appropriate species- and roost-specific avoidance and protection measures shall be developed by the qualified biologist. Such measures may include postponing the removal of occupied buildings or other structures, establishing exclusionary work buffers while the roost is active (e.g., 100-foot no-disturbance buffer), or other avoidance measures depending on the species present, their protection status, and roost type. If a maternity roost of any size supporting any bat species is detected during surveys, an avoidance buffer, as determined by the qualified biologist, shall be maintained until the young bats are flying. The qualified biologist shall determine the extent of protective buffers, and buffer placement would depend 	4. RPD, qualified biologist	4. Construction	4. RPD and environmental compliance contractor	4. Monitor to ensure that the contractor implements avoidance and minimization.

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO RECREATION AND PARKS (RPD) (CONTINUED)				
BIOLOGICAL RESOURCES (CONTINUED)				
<p>on: the species' sensitivity to disturbance, which can vary among species; the level of noise or construction disturbance; the line-of-sight between the roost and the disturbance; ambient noise (baseline noise) and other disturbances under existing conditions; and consideration of other topographical or artificial barriers.</p> <ul style="list-style-type: none"> The qualified biologist shall be present during building/structure demolition if potential bat roosting habitat or active bat roosts are present and roosts do not contain young. Buildings/structures with active roosts shall be disturbed only under clear weather conditions when precipitation is not forecast for three days and when daytime temperatures are at least 50 degrees Fahrenheit. Removal of buildings/structures containing or suspected to contain active bat roosts shall be dismantled under the supervision of the qualified biologist in the evening and after bats have emerged from the roost to forage. Buildings/structures shall be partially dismantled to significantly change the roost conditions, causing bats to abandon and not return to the roost. 				
PALEONTOLOGICAL RESOURCES				
<p>Mitigation Measure M-GE-5: Inadvertent Discovery of Paleontological Resources</p> <p><i>Worker Awareness Training.</i> Prior to commencing construction, and ongoing throughout ground disturbing activities (e.g., excavation, utility installation), the RPD and SFPUC and/or their designee shall ensure that all project construction workers are trained on the contents of the Paleontological Resources Alert Sheet, as provided by the planning department. The Paleontological Resources Alert Sheet shall be prominently displayed at the construction site during ground disturbing activities for reference regarding potential paleontological resources.</p> <p>In addition, the RPD and SFPUC shall inform the contractor and construction personnel of the immediate stop work procedures and other procedures to be followed if bones or other potential fossils are unearthed at the project site. Should new workers that will be involved in ground disturbing construction activities begin employment after the</p>	<p>1. RPD</p> <p>2. RPD</p>	<p>1. Design</p> <p>2. Construction</p>	<p>1. RPD project manager</p> <p>2. RPD and environmental compliance contractor</p>	<p>1. Ensure contract documents include requirements for Worker Paleontological Resources Training and stop work procedures</p> <p>2. Provide Paleontological Resources training to construction workers.</p>

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO RECREATION AND PARKS (RPD) (CONTINUED)				
PALEONTOLOGICAL RESOURCES (CONTINUED)				
<p>initial training has occurred, the construction supervisor shall ensure that they receive the worker awareness training as described above.</p> <p>The RPD and SFPUC shall complete the standard form/affidavit confirming the timing of the worker awareness training to the Environmental Review Officer (ERO). The affidavit shall confirm the project's location, the date of training, the location of the informational handout display, and the number of participants. The affidavit shall be transmitted to the ERO within five business days of completion of excavation.</p> <p><i>Paleontological Resource Discoveries.</i> In the event of the discovery of an unanticipated paleontological resource during project construction, ground disturbing activities shall temporarily be halted within 25 feet of the find until the discovery is examined by a qualified paleontologist meeting the qualifications stated by the Society of Vertebrate Paleontology standards (SVP 2010). Work within the sensitive area shall resume only when deemed appropriate by the qualified paleontologist in consultation with the ERO.</p> <p>The qualified paleontologist shall determine: 1) if the discovery is scientifically significant; 2) the necessity for involving other responsible or resource agencies and stakeholders, if required or determined applicable; and 3) methods for resource documentation or recovery. If a paleontological resource assessment results in a determination that the resource is not scientifically important, this conclusion shall be documented in a Paleontological Evaluation Letter to demonstrate compliance with applicable statutory requirements (e.g., Federal Antiquities Act of 1906, CEQA Guidelines Section 15064.5, California Public Resources Code Chapter 17, Section 5097.5, Paleontological Resources Preservation Act 2009). The Paleontological Evaluation Letter shall be submitted to the ERO for review within 30 days of the discovery.</p> <p>If the qualified paleontologist determines that a paleontological resource is of scientific importance, and there are no feasible measures to avoid disturbing this paleontological resource, the qualified paleontologist shall prepare a Paleontological Mitigation Program. The mitigation program shall include measures to fully document the resource of scientific importance and to determine if recovery is appropriate. The</p>	<p>3. RPD (qualified paleontologist)</p> <p>4. RPD (qualified paleontologist)</p> <p>5. RPD</p>	<p>3. Construction</p> <p>4. Construction</p> <p>5. Construction</p>	<p>3. RPD and environmental compliance contractor</p> <p>4. RPD and environmental compliance contractor</p> <p>5. RPD and environmental compliance contractor</p>	<p>3. If paleontological resource are found, implement measures specified in mitigation measure.</p> <p>4. Monitor to ensure that the contractor implements avoidance and minimization measures in contract documents. Report noncompliance and ensure corrective action.</p> <p>5. Submit report to ERO, if needed.</p>

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
MITIGATION MEASURES AGREED TO BY SAN FRANCISCO RECREATION AND PARKS (RPD) (CONTINUED)				
PALEONTOLOGICAL RESOURCES (CONTINUED)				
<p>qualified paleontologist shall submit the mitigation program to the ERO for review and approval within 10 business days of the discovery. Upon approval by the ERO, ground disturbing activities in the project area shall resume and be monitored as determined by the qualified paleontologist for the duration of such activities.</p> <p>The mitigation program shall include: 1) procedures for construction monitoring at the project site; 2) fossil preparation and identification procedures; 3) curation of paleontological resources of scientific importance into an appropriate repository; and 4) preparation of a Paleontological Resources Report (report or paleontology report) at the conclusion of ground disturbing activities. The report shall include dates of field work, results of monitoring, fossil identifications to the lowest possible taxonomic level, analysis of the fossil collection, a discussion of the scientific significance of the fossil collection, conclusions, locality forms, an itemized list of specimens, and a repository receipt from the curation facility.</p> <p>The SFPUC (for demolition and soil remediation) or RPD (for all other construction) shall be responsible for the preparation and implementation of the mitigation program, in addition to any costs necessary to prepare and identify collected fossils, and for any curation fees charged by the paleontological repository. The paleontology report shall be submitted to the ERO for review within 30 business days from conclusion of ground disturbing activities, or as negotiated following consultation with the ERO.</p>				
SAN FRANCISCO RECREATION AND PARKS (RPD) STANDARD CONSTRUCTION MEASURES				
1. AIR QUALITY				
All San Francisco Recreation and Park Department (RPD) projects will comply with the Construction Dust Control Ordinance. Major construction projects that are estimated to require 20 or more days of cumulative days of work within the Air Pollutant Exposure Zone must comply with the additional clean construction requirements of the Clean Construction Ordinance.	1. RPD	1. Design	1. RPD project manager	1. Ensure contract documents include dust control ordinance requirements.

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO RECREATION AND PARKS (RPD) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
1. AIR QUALITY (CONTINUED)				
	2. RPD	2. Construction	2. RPD	2. Monitor to ensure that the contractor implements measures in contract documents, report noncompliance, and ensure corrective action.
1. AIR QUALITY ATTACHMENT A: SAN FRANCISCO RECREATION AND PARKS DEPARTMENT DUST-CONTROL MEASURES				
<p>For the purposes of this document, “sensitive receptor” means residence, school, childcare center, hospital or other health-care facility or group living quarters, and “visible dust” means dust comprising visible emissions as defined in Bay Area Air Quality Management Board Regulation 6 – Particulate Matter.</p> <p>For all projects, RPD will institute through its construction specifications the following dust- control measures to achieve a goal of no visible dust emissions:</p> <ul style="list-style-type: none"> • Clean up spillage on City streets, whether directly or indirectly caused by construction operations. • Remove demolition debris from the Site no later than the end of each workday. Any hazardous materials and/or suspected hazardous materials stored on site shall be stored in accordance with all applicable Cal EPA regulations, including being stored in proper containers and being protected from exposure from the elements. Any such materials shall be removed from the site as soon as possible for disposal/recycling in accordance with all applicable statutes and regulations. • Keep the Site and adjacent areas clean and perform wet sweeping at the end of each shift. • Perform continuous water spraying during dust generating activities. Mist or spraying shall be conducted in such a way as to prevent puddling or generation of runoff. Mist any immediate area of demolition with a water spray to prevent airborne dust particles. 	<p>1. RPD</p> <p>2. RPD (contractor)</p> <p>3. RPD</p>	<p>1. Design</p> <p>2. Pre-construction</p> <p>3. Construction</p>	<p>1. RPD project manager</p> <p>2. RPD, Department of Public Health</p> <p>3. RPD and environmental compliance contractor</p>	<p>1. Ensure contract documents include dust control measures.</p> <p>2. If project meets requirements, prepare Site-Specific Dust Control Plan for the review and approval of the Department of Public Health.</p> <p>3. Monitor to ensure that the contractor implements measures in contract documents, report noncompliance, and ensure corrective action.</p>

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO RECREATION AND PARKS (RPD) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
1. AIR QUALITY ATTACHMENT A: SAN FRANCISCO RECREATION AND PARKS DEPARTMENT DUST-CONTROL MEASURES (CONTINUED)				
<ul style="list-style-type: none"> Wet all exposed soil surfaces at least three times daily during dry weather or more frequently if dust is blowing or if required by the City. Any serpentine residuals on the street shall be wet swept immediately. Use dust enclosures, curtains, and dust collectors as necessary to control dust. Load haul trucks, hauling debris, soils, sand or other such materials so that the material does not extend above the walls or back of the truck bed. Wet before covering and tightly cover the surface of each load before the haul truck leaves the loading area. Limit vehicle speed limit on unpaved roads to 15 miles per hour (mph). Cover any inactive (no disturbance for more than seven days) stockpiles greater than ten cubic yards or 500 square feet of excavated materials, backfill material, import material, gravel, sand, road base, and soil with a 10 mil (0.01 inch) polyethylene plastic or equivalent tarp and brace it down or use other equivalent soil stabilization techniques. Reclaimed water will be used for all dust-control operations to the extent feasible (without resorting to extraordinary means and measures) and allowed by law. <p>If the project grades or excavates more than one half acre surface area at any given time, and the project is within 1,000 feet of a sensitive receptor as defined above, RPD or its contractor shall prepare a Site-Specific Dust Control Plan for the review and approval of the Department of Public Health. The site-specific dust control plan shall contain mapping identifying locations of sensitive receptors and contain additional site-specific dust monitoring and control measures that will apply to the project. These site-specific measures may include the following or equivalent measures, which accomplish the goal of minimizing visible dust:</p> <ul style="list-style-type: none"> Wetting down areas around soil improvement operations, visibly dry disturbed soil surface areas, and visibly dry disturbed unpaved driveways at least three times per shift per day. Analysis of the wind direction. 				

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO RECREATION AND PARKS (RPD) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
1. AIR QUALITY ATTACHMENT A: SAN FRANCISCO RECREATION AND PARKS DEPARTMENT DUST-CONTROL MEASURES (CONTINUED)				
<ul style="list-style-type: none"> • Placement of upwind and downwind particulate dust monitors. • Recordkeeping for particulate monitoring results. • Hiring of an independent third party to conduct inspections for visible dust and keeping records of those inspections. • Requirements for when dust generating operations have to be shut down due to dust crossing the property boundary or if dust is contained within the property boundary but not controlled after a specified number of minutes. • Establishing a hotline for surrounding community members to call and report visible dust problems so that RPD or its contractor can promptly fix those problems; posting signs around the site with the hotline number and making sure that the number is given to adjacent residents, schools and businesses. • Limiting the area subject to excavation, grading, and other demolition or construction activities at any one time. • Minimizing the amount of excavated material or waste materials stored at the site. • Installing dust curtains, plastic tarps or windbreaks, or planting tree windbreaks on the property line on windward and down windward sides of construction areas, as necessary. • Paving, applying water three times daily, or applying non-toxic soil stabilizers on all unpaved access roads, parking areas and staging areas at the construction site. Reclaimed water must be used if required by Article 21, Section 1100 et seq. of the San Francisco Public Works Code, Article 22. If not required, reclaimed water should be used whenever possible. • Establishing speed limits so that vehicles entering or exiting construction areas shall travel at a speed that minimizes dust emissions. This speed shall be no more than 15 mph. • Installing wheel washers to clean all trucks and equipment leaving the construction site. If wheel washers cannot be installed, tires or tracks and spoil trucks shall be brushed off before they reenter City streets to minimize deposition of dust-causing materials. 				

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO RECREATION AND PARKS (RPD) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
1. AIR QUALITY ATTACHMENT A: SAN FRANCISCO RECREATION AND PARKS DEPARTMENT DUST-CONTROL MEASURES (CONTINUED)				
<ul style="list-style-type: none"> Terminating excavation, grading, and other construction activities when winds speeds exceed 25 mph. Hydroseeding inactive construction areas, including previously graded areas inactive for at least 10 calendar days, or applying non-toxic soil stabilizers. Sweeping of surrounding streets during demolition, excavation and construction at least once per day to reduce particulate emissions. 				
2. WATER QUALITY				
All RPD projects will implement erosion and sedimentation controls, as necessary, tailored to the project site, such as fiber rolls and/or gravel bags around storm drain inlets, installation of silt fences, and other such measures sufficient to prevent discharges of sediment and other pollutants to storm drains and all surface waterways, such as San Francisco Bay, the Pacific Ocean, water supply reservoirs, wetlands, swales, and streams. As required, based on project location and size, a Stormwater Control Plan (in most areas of San Francisco) or a Stormwater Pollution Prevention Plan (SWPPP) (in certain areas of San Francisco) will be prepared. If uncontaminated groundwater is encountered during excavation activities, it will be discharged in compliance with applicable water quality standards and discharge permit requirements.	1. RPD 2. RPD	1. Pre-construction 2. Construction	1. RPD project manager 2. RPD and environmental compliance contractor	1. Ensure contract documents include SWPPP preparation 2. Monitor that contractor implements and maintains SWPPP best management practices for the duration of construction consistent with SWPPP
3. BIOLOGICAL RESOURCES				
The RPD will comply with all local, State, and federal requirements for surveys, analysis, and protection of biological resources (e.g., Migratory Bird Treaty Act, federal and State Endangered Species Acts, etc.). RPD will screen all RPD project sites and the immediately surrounding area to determine whether significant biological resources may be affected by construction. If significant biological resources are present, a qualified biologist will carry out a survey of the project site to note the presence of general biological resources and to identify whether habitat for special-status species and/or migratory birds is present. If necessary, measures will be implemented to protect biological resources, such as installing wildlife exclusion fencing, establishing work buffer zones, installing bird	Nesting bird surveys shall be conducted prior to construction in accordance with this measure and any work buffer zones, bird deterrents, monitoring, and other such measures shall be implemented as needed. Biological resources surveys required by this measure were conducted for the EIR. Additional biological resources requirements are detailed in the mitigation measures described above: Mitigation Measure M-BI-1a: Worker Environmental Awareness Program Training Mitigation Measure M-BI-1b: Avoidance and Minimization Measures for Western Pond Turtle Mitigation Measure M-BI-3a: Restoration of Arroyo Willow Riparian Scrub and Freshwater Marsh Wetlands Mitigation Measure M-BI-3b: Compensation for Permanent Fill of Wetlands and Waters			

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO RECREATION AND PARKS (RPD) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
1. BIOLOGICAL RESOURCES (CONTINUED)				
deterrents, monitoring by a qualified biologist, and other such measures. If tree removal is required, RPD would comply with any applicable tree protection ordinance and policy.	Mitigation Measure M-BI-6: Avoidance and Minimization Measures for Bats			
2. VISUAL AND AESTHETIC CONSIDERATIONS				
RPD will maintain all project sites in a clean and orderly state. Construction staging areas will be sited away from public view, and on currently paved or previously disturbed areas, where possible. Nighttime lighting will be directed away from residential areas and have shields to prevent light spillover effects. Upon project completion, project sites on City-owned lands will be returned to their general pre-project condition, including re-grading of the site and re-vegetation or re-paving of disturbed areas to the extent this is consistent with the Park Code and San Francisco Administrative Code and Charter.	1. RPD (construction contractor) 2. RPD	1. Construction 2. Construction	1. RPD 2. RPD	1. Maintain project sites 2. Return city-owned lands to pre-project condition
3. CULTURAL RESOURCES				
RPD will screen all projects that will alter a building or structure, produce vibrations, or include soil disturbance to assess whether cultural resources are or may be present and could be affected, in coordination with San Francisco Planning Department Environmental Planning (EP) staff as detailed below. <i>Archeological Resources.</i> No archeological review is required for a project that will not entail soil disturbance. Projects involving soil disturbance will initially be screened by RPD staff to identify whether there is demonstrable evidence of prior soil disturbance at the project site to the maximum vertical and horizontal extent of the current project's planned disturbance. RPD will complete the RPD Preliminary Archeological Checklist (PAC), Part I only (see Attachment C). For projects where prior complete soil disturbance has occurred throughout areas of planned work, RPD will provide evidence of the previous disturbance in the environmental application to be reviewed by EP Archeological staff. 1. For projects that are on previously undisturbed sites or where the depth/extent of prior soil disturbance cannot be documented, or where the planned project-related soil disturbance will extend	Archeological Resources requirements met by implementation of the following standard measures, detailed below. RPD Archeological Measure I (Archeological Discovery) RPD Archeological Measure II (Archeological Monitoring)			

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a		
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility
SAN FRANCISCO RECREATION AND PARKS (RPD) STANDARD CONSTRUCTION MEASURES (CONTINUED)			
5. CULTURAL RESOURCES (CONTINUED)			
<p>beyond the depth/extent of prior soil disturbance, additional screening will be carried out as detailed below and shown on the flow chart titled "RPD Standard Construction Measure #5 Archeological Assessment Process" (see Attachment D). The EP Archeologist will complete the Preliminary Archeological Checklist, Part II (PAC) for the project, which will include recommendations for one of three Standard Archeological Measures (I - Discovery, II – Monitoring, or III – Testing/Data Recovery) to be implemented by RPD to protect and/or treat significant archeological resources identified as being present within the site and potentially affected by the project (see Attachments E, F, and G). Additional research and documentation, such as an Archeological Research Design and Treatment Plan (ARDTP), Archeological Sensitivity Study (ASA), Archeological Sensitivity Assessment Testing (ASAT), or an archeological field survey, may also be requested by EP Archeological staff. These documents will be completed by a qualified consultant from the EP Archeological Resources Consultant Pool and will be scoped, reviewed, and approved by EP Archeological staff.</p> <p>2. RPD will implement the PAC recommendations prior to and/or during project construction consistent with Standard Archeological Measures I, II, and III, and will consult with the EP Archeologist in selecting a qualified archeological consultant from the EP Archeological Resources Consultant Pool, as needed, to implement these measures.</p> <p>3. RPD will not begin soil-disturbing activities in archeologically sensitive areas, as identified through the above screening, until required preconstruction archeological measures of the PAC (e.g., preparation of an Archeological Monitoring Plan, Archeological Treatment Plan, and/or an Archeological Research Design and Data Recovery Plan) have been implemented.</p>			

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO RECREATION AND PARKS (RPD) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
5. CULTURAL RESOURCES (CONTINUED)				
<p><i>Historic (Built Environment) Resources.</i> RPD will consult with Planning Department Preservation staff to determine if projects that would modify an existing building, structure, or landscape feature require preservation review and if a Historic Resource Evaluation (HRE) or Cultural Landscape Report (CLR) will be required. The HRE or CLR will be prepared by a qualified architectural historian and will be scoped with Planning Department Preservation staff. Where the potential for the project to have adverse effects on an historical resource is identified by Planning Department Preservation staff, the Planning Department Preservation Planner will consult with RPD to determine if the project can be conducted as planned or if the project design can be revised to avoid the significant impact. If these options are not feasible, the project will need to undergo further environmental review with the Planning Department and mitigation may be required. If so, the project would not qualify for a Categorical Exemption from CEQA review.</p> <p>Where construction will take place in proximity to a building, structure, landscape, or monument identified as a significant historical resource but would not otherwise directly affect it, RPD will implement protective measures, such as but not limited to, the erection of temporary construction barriers to ensure that inadvertent impacts to such elements are avoided. RPD will develop these measures prior to construction and document them in a Construction Best Practices for Historical Resources Plan and a plan outlining the Construction Monitoring for Historical Resources Program to be reviewed and approved by Planning Department Preservation staff prior to construction.</p> <p>If a project includes or is directly adjacent to historic buildings, structures, or monument susceptible to vibration (such as but not limited to unreinforced masonry, earthen construction, lathe and plaster, statues, or fragile architectural ornamentation) as determined in consultation with Planning Department Preservation staff, the Planning Department will determine if vibrations associated with proposed construction activities has the potential to cause damage to such buildings or structures. Generally, vibration below 0.12 inches per second peak particle velocity does not have the potential to damage sensitive</p>	<p>Historic (Built Environment) Resources requirements met by implementation of the following measures, detailed above and in MMRP Phase 1:</p> <p>Mitigation Measure M-CR-1a: Documentation of Historical Resources (by SFPUC and RPD)</p> <p>Mitigation Measure M-CR-1b: Video Documentation (by SFPUC and RPD)</p> <p>Mitigation Measure M-CR-1c: Interpretive Program</p> <p>Mitigation Measure M-CR-1d: Oral Histories (by SFPUC and RPD)</p>			

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO RECREATION AND PARKS (RPD) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
CULTURAL RESOURCES (CONTINUED)				
<p>buildings or structures. A vibration study may be necessary to determine if such vibration levels will occur. If RPD determines in consultation with Planning Department Preservation staff that vibration damage may occur, RPD will engage a qualified historic architect or historic preservation professional to document and photograph the pre-construction condition of the building, structure, or monument and prepare a plan for monitoring the building, structure, or monument during construction. RPD will submit the monitoring plan to the Planning Department Preservation Planner for review and approval prior to the beginning of construction. The monitoring plan will identify how often monitoring will occur, who will undertake the monitoring, reporting requirements on vibration levels, reporting requirements on damage to adjacent historical resources during construction, reporting procedures to follow if such damage occurs, and the scope of the preconstruction survey and post-construction conditions assessment. RPD will implement the approved monitoring plan during construction.</p> <p>If any damage to a historic building, structure, or monument occurs, RPD will immediately notify the Planning Department Preservation Planner and modify activities to minimize further vibration. If the event of damage, RPD will repair the building following the Secretary of the Interior's Standards for the Treatment of Historic Properties under the guidance of a qualified historic architect or historic preservation professional in consultation with a Planning Department Preservation Planner.</p> <p><i>Reporting.</i> RPD will follow the reporting requirements specified in the applicable Standard Archeological Measures (see Attachments E–G). If Construction Best Practices for Historical Resources Plan and/or a plan outlining the Construction Monitoring for Historical Resources Program, as discussed above are required, RPD will follow reporting requirements outlined in those approved plans. RPD will provide monthly project updates to Planning Department staff.</p>				

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO RECREATION AND PARKS (RPD) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
RPD ARCHEOLOGICAL MEASURE I (ARCHEOLOGICAL DISCOVERY)				
<p>Prior to ground disturbing activities:</p> <p>A. Alert Sheet. RPD shall, prior to any soils disturbing activities, distribute the Planning Department archeological resource "ALERT" sheet to each project contractor or vendor involved in project-related soils disturbing activities; ensure that each contractor circulates it to all field personnel; and provide the Environmental Review Officer (ERO) with a signed affidavit from each contractor confirming distribution to all field personnel.</p> <p>Upon making a discovery:</p> <p>A. Work Suspension. Should a potential archeological resource be encountered during project soils disturbing activity, with or without an archeological monitor present, the project Head Foreman shall immediately suspend soils-disturbing activities within 50 feet (15 meters) of the discovery in order to protect the find from further disturbance, and notify the RPD Project Manager (PM), who shall immediately notify the ERO for further consultation.</p> <p>B. Qualified Archeologist. All archeological work conducted under this measure shall be performed by an archeologist who meets the Secretary of the Interior's Professional Qualifications Standards (36-CFR 61); consultants will be selected in consultation with the ERO and meeting the criteria or specialization required for the resource type as identified by the ERO in a manner consistent with RPD contracting requirements.</p> <p>C. Assessment and Additional Measures. If the ERO determines that the discovery is a potential archeological/historical resource, the qualified archeologist, in consultation with the ERO, shall document the find, evaluate based on available information whether it qualifies as a significant historical resource under the CEQA criteria, and provide recommendations for additional treatment as warranted. The ERO will consult with RPD and the qualified archeologist on these recommendations and may require implementation of additional measures as set forth below in</p>	1. RPD	1. Design	1. RPD project manager	1. Ensure contract documents include ALERT sheet
	2. RPD	2. Pre-construction	2. RPD project manager	2. RPD distribute sheet to contractor and ensure circulation to field staff
	3. RPD	3. Pre-construction	3. RPD	3. Provide ERO with signed affidavit from contractor
	4. RPD	4. Construction	4. RPD and environmental compliance contractor	4. Upon discovery, suspend activity and notify RPD; RPD to notify ERO
	5. RPD, qualified archeologist	5. Construction	5. RPD, ERO	5. ERO consult with RPD and implement qualified archeologist recommendations
	6. Qualified archeologist	6. Construction	6. RPD, ERO	6. Qualified archeologist draft and finalize archeological reports
	7. RPD	7. Construction	7. RPD	7. ERO approve report and distribute to CHRIS

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO RECREATION AND PARKS (RPD) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
RPD ARCHEOLOGICAL MEASURE I (ARCHEOLOGICAL DISCOVERY) (CONTINUED)				
<p>Archeological Measures II and III, such as preparation and implementation of an Archeological Monitoring Plan, an Archeological Testing Plan, and/or an Archeological Data Recovery Plan, and including associated research designs, descendant group consultation, other reporting, curation, and public interpretation of results.</p> <p>D. Report Reviews. All plans and reports prepared by an archeological consultant, as specified herein, shall be submitted first and directly to the ERO for review and comment with a copy to RPD and shall be considered draft reports subject to revision until final approval by the ERO.</p> <p>E. Draft and Final Archeological Resources Reports. For projects in which a significant archeological resource is encountered and treated during project implementation (see Archeological Measures II and III), the archeological consultant shall submit a draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken, research questions addressed, and research results. Information that may put at risk any archeological resource shall be provided in a separate, removable insert within the draft final report.</p> <p>Once approved by the ERO, copies of the FARR shall be distributed as follows: two copies to the applicable California Historic Information System Information Center (CHRIS), one copy to each descendant group involved in the project, and documentation to the San Francisco Planning Department of transmittal of the above copies. In addition, the Planning Department shall be provided one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR, which shall include copies of any formal site recordation forms (CA DPR 523 series) and/or National Register of Historic Places/California Register of Historical Resources nominations.</p>				

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO RECREATION AND PARKS (RPD) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
RPD ARCHEOLOGICAL MEASURE I (ARCHEOLOGICAL DISCOVERY) (CONTINUED)				
<p>F. Other Reports. In instances of high public interest or interpretive value, the ERO may require different or additional final report content, format, and distribution than that presented above.</p> <p>G. Human Remains, Associated or Unassociated Funerary Objects. RPD shall ensure that human remains and associated or unassociated funerary objects discovered during any soils disturbing activity are treated in compliance with applicable State and federal laws. In the event of the discovery of potential human remains, the construction contractor shall ensure that construction activity within 50 feet of the find is halted and the RPD PM, ERO, and the County Coroner are notified immediately. If the Coroner determines that the remains are of Native American origin, he/she will notify the California State Native American Heritage Commission. Subsequent consultation on and treatment of the remains shall be conducted consistent with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(d), in consultation with the ERO.</p> <p>H. Consultation with Descendant Communities. Consistent with AB 52 requirements, if requested, RPD shall provide opportunities for Native American descendant groups to provide input during project planning for projects that may affect potential Tribal Cultural Resources. In addition, on discovery during construction of an archeological site associated with descendant Native Americans, the Overseas Chinese, or other descendant group, an appropriate representative of the descendant group shall be contacted by RPD at the direction of the ERO. RPD will offer this representative the opportunity to monitor archeological field investigations of the site and to consult with the ERO regarding the appropriate treatment and, if applicable, interpretation of the site and the recovered materials.</p> <p>I. Construction Delays. Archeological monitoring and/or data recovery programs required by this measure may suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if this is the only feasible means to reduce potential effects on a significant archeological find to a less-than-significant level.</p>				

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO RECREATION AND PARKS (RPD) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
RPD ARCHEOLOGICAL MEASURE II (ARCHEOLOGICAL MONITORING)				
<p>A. Archeological Monitoring Plan (AMP). Where an archeological field investigation to identify expected buried or submerged resources cannot reasonably be carried out during project planning/ environmental review (for example, where definitive determination would require extensive street opening prior to construction), prior to any project-related soils-disturbing activities the qualified archeologist identified under Archeological Measure I.C. shall consult with RPD and the ERO to develop an Archeological Monitoring Plan (AMP). The AMP which will be implemented in conjunction with soil-disturbing activities during construction. Preparation and implementation of an AMP also may be required based on the results of preconstruction archeological testing or upon a discovery during construction.</p> <p>The AMP shall include the following elements, at minimum:</p> <ul style="list-style-type: none"> • Historical context and research design for assessment of resource types likely to be encountered; • Project activities to be archeologically monitored and intensity of monitoring of each type and location of project construction activity; and • Procedures for the documentation, significance and integrity assessment, treatment, curation, interpretation and reporting of the types of resources likely to be encountered. <p>B. Reporting. Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO at the end of construction (see Archeological Measure I.E [Report Reviews] and I.F. [Draft and Final Archeological Research Report]).</p>	<p>1. RPD (qualified archeologist)</p> <p>2. RPD (qualified archeologist)</p>	<p>1. Construction</p> <p>2. Post-construction</p>	<p>1. RPD</p> <p>2. RPD</p>	<p>1. Qualified archeologist consult with RPD and ERO to develop AMP</p> <p>2. Archeological consultant submit AMP to ERO at end of construction</p>

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SPFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
RPD ARCHEOLOGICAL MEASURE II (ARCHEOLOGICAL MONITORING) (CONTINUED)				
<p>C. Monitoring Authorities</p> <ul style="list-style-type: none"> The archeological monitor will have the authority to halt construction activity at the location of a suspected resource for inspection, documentation, and assessment of the need for further measures as set forth in Archeological Measure III. The Archeological Monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis. The Archeological Monitor(s) shall be present on the project site according to a schedule identified in the AMP, subject to modification upon ERO concurrence, based on findings. <p>D. Testing/Data Recovery. In the event of a discovery during construction, if the ERO and archeological consultant determine that the discovery is a significant resource (that is, a resource that meets the eligibility criteria of the California Register of Historic Resources or qualifies as a unique archeological resource) that will be adversely affected (that is, where the project would result in loss of data potential) or that additional investigation is required to make this determination, all applicable elements of Archeological Measure III (Archeological Testing/Data Recovery) also shall be implemented.</p>				
RPD ARCHEOLOGICAL MEASURE III (TESTING/DATA RECOVERY)				
<p>The following provisions apply prior to or during construction when a significant archeological resource (as defined in Measure II.D) or an archeological resource of undetermined significance is expected to be present in the work area and the ERO, in consultation with the qualified archeologist, determines that an archeological field investigation is needed to determine: a) the presence of an archeological resource, b) whether it retains depositional integrity, and c) whether it qualifies as a legally significant resource under CEQA criteria. All archeological work under this Measure will be carried out by a qualified archeologist as identified in Archeological Measure I.C. Per Archeological Measure I.J, implementation of this measure shall not exceed four weeks except at</p>	<ol style="list-style-type: none"> RPD (qualified archeologist) RPD (qualified archeologist) RPD 	<ol style="list-style-type: none"> Construction Construction Construction 	<ol style="list-style-type: none"> RPD RPD RPD 	<ol style="list-style-type: none"> Submit Archeological Testing Program to ERO Implement Archeological Testing Program and submit report to ERO Evaluate feasibility of preserve in place

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SPFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
RPD ARCHEOLOGICAL MEASURE III (TESTING/DATA RECOVERY) (CONTINUED)				
<p>the direction of the ERO and only if this is the only feasible means to reduce potential effects on a significant archeological find to a less-than-significant level.</p> <p>A. Archeological Testing Program. If an archeological investigation is required in order to verify resource location and/ or assess the significance of the resource, the archeological consultant shall consult with the ERO to prepare and implement an Archeological Testing Plan (ATP) that identifies:</p> <ul style="list-style-type: none"> • Key research questions and associated data needs, • Testing/ sampling methods, and • Testing locations. <p>Results of testing shall be presented to ERO in a written report following Measure I.E. If, based on the archeological testing program, the archeological consultant finds and the ERO concurs that significant archeological resources may be present, Measures III.B and/or III.C below will be implemented.</p> <p>B. Treatment. If the project could adversely affect a significant (CRHR-eligible) archeological resource, preservation in place is the preferred manner of mitigating impacts, as detailed in CEQA Guidelines 15126.6(b) (3)(a) and (b).</p> <p>If preservation in place is determined to be infeasible, the RPD at its discretion shall either:</p> <ul style="list-style-type: none"> • Re-design the proposed project so as to reduce the adverse effect to a less-than-significant level through preservation in place or other feasible measures; and/or • For a resource important for its association with an important event or person, or which is of demonstrable public interest for both its scientific and historical values (e.g., a submerged ship), and where feasible, preserve the resource in place with appropriate documentation; or, if not feasible to preserve in place, systematically document and/or recover for interpretive use, at the discretion of the ERO, and/or; 	<p>4. RPD (qualified archeologist)</p> <p>5. RPD (qualified archeologist)</p>	<p>4. Construction</p> <p>5. Construction</p>	<p>4. RPD</p> <p>5. RPD</p>	<p>4. If data recovery is anticipated, submit Archeological Data Recovery Plan to ERO</p> <p>5. Implement Archeological Data Recovery Plan and incorporate results into FARR, submit to ERO</p>

Adopted Mitigation Measure or Standard Construction Measure	Monitoring and Reporting Program ^a			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/Completion Criteria
SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC) STANDARD CONSTRUCTION MEASURES (CONTINUED)				
RPD ARCHEOLOGICAL MEASURE III (TESTING/DATA RECOVERY) (CONTINUED)				
<ul style="list-style-type: none"> For an archeological resource significant primarily for its data potential, design and implement an archeological data recovery program, as detailed under Measure III.D, below. <p>C. Archeological Data Recovery Plan (ADRP). For resources for which the elected treatment is archeological data recovery, the archeological consultant, in consultation with the ERO, shall prepare and implement an ADRP. It will identify how the significant information the archeological resource is expected to contain will be recovered and preserved. Data recovery results will be reported in the FARR, as detailed in Measure I.F. The ADRP shall include the following elements:</p> <ul style="list-style-type: none"> Historic context and research design Field methods and procedures, including sampling strategy Archeological monitoring recommendations for ongoing construction Cataloguing and laboratory analysis Discard, deaccession, and curation policy Interpretive program Security measures 				

NOTES:

^a Definitions of MMRP Column Headings:

- *Adopted Mitigation Measures*: Full text of the mitigation measure(s) copied verbatim from the final CEQA document.
- *Implementation Responsibility*: Entity who is responsible for implementing the mitigation measure. In most cases this is the project sponsor and/or project's sponsor's contractor/consultant and at times under the direction of the planning department.
- *Mitigation Schedule*: Identifies milestones for when the actions in the mitigation measure need to be implemented.
- *Monitoring/Reporting Responsibility*: Identifies who is responsible for monitoring compliance with the mitigation measure and any reporting responsibilities. In most cases it is the Planning Department who is responsible for monitoring compliance with the mitigation measure. If a department or agency other than the planning department is identified as responsible for monitoring, there should be an expressed agreement between the planning department and that other department/agency. In most cases the project sponsor, their contractor, or consultant are responsible for any reporting requirements.
- *Monitoring Actions/Completion Criteria*: Identifies the milestone at which the mitigation measure is considered complete. This may also identify requirements for verifying compliance.

Agency Acronyms Used in Table:

ERO = (SF Planning Department) Environmental Review Officer
 RPD = San Francisco Recreation and Parks Department
 SFPUC = San Francisco Public Utilities Commission
 SFMTA = San Francisco Municipal Transportation Agency