Candlestick Point State Recreation Area

Preliminary General Plan and Final Program Environmental Impact Report / Response to Comments Document

State Clearinghouse No. 2010012059

September 2012

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September 2012

Edmund G. Brown, Jr.
Governor

John Laird
Secretary, Natural Resources Agency

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1 Introduction

On January 5, 2012, California State Parks released to the general public and public agencies the Preliminary General Plan and Draft Program Environmental Impact Report (EIR) for the Candlestick Point State Recreation Area (CPSRA, or the park). The proposed General Plan will guide development and future management of the CPSRA. It contains a comprehensive and integrated set of goals and guidelines for the development and long-term management of the CPSRA that focuses on activities and facilities at the CPSRA, protection of environmental resources, provisions of visitor use and opportunities, administration and operations, and integration with the surrounding community.

The Draft Program EIR included in the General Plan contains the environmental analysis of potentially significant effects resulting from implementation of the proposed General Plan. Together, the Draft Program EIR and this document, including the response to comments, constitute the Final Program Environmental Impact Report for the CPSRA General Plan.

In accordance with Public Resources Code Section 21091 and California Environmental Quality Act (CEQA) Guidelines Section 15087, a 45-day public review period for the Preliminary General Plan and Draft Program EIR was provided. The public was advised of the availability of the Preliminary General Plan and Draft Program EIR through legal notices placed in the local newspaper, direct mailings, and notification on the State Park planning web site. A public notice (Notice of Availability) was posted with the San Francisco County clerk/recorder, and was published in the San Francisco Chronicle.

Copies of the Preliminary General Plan and Draft Program EIR were also made available for review at the following locations:

- California State Parks, Diablo Vista District, 845 Casa Grande Road, Petaluma, CA 94954
- San Francisco Main Library, 100 Larkin Street, San Francisco, CA 94102
- Bayview Library, 1601 Lane Street, San Francisco, CA 94124

The Draft Program EIR was also available online at http://parks.ca.gov/candlestickgp.

The public review period for the Preliminary General Plan and Draft Program EIR ended on February 21, 2012. During the public review period, comments were received from several agencies and individuals. This document provides responses to the written comments received during the public review period. The focus of the response to comments is on the disposition of environmental issues that have been raised in the comments, as specified by CEQA Guidelines Section 15088(b). The response to comments also includes issues related to planning considerations of the General Plan.

This document is organized as follows:

- **Chapter 1** (Introduction) provides a brief overview of the public review process of the Preliminary General Plan and Draft Program EIR, and describes the organization of the Final EIR.
- **Chapter 2** (List of Commenters) provides a list, in table format, of all written comments received on the CPSRA Preliminary General Plan and Draft Program EIR during the public review period.
- **Chapter 3** (Comments and Responses) provides a complete copy of, and responses to, all written comments on the CPSRA Preliminary General Plan and Draft Program EIR received during the public review period.
- **Chapter 4** (Recommended Changes to the General Plan) provides a reproduction of portions of the Preliminary General Plan and Draft Program EIR, with proposed revisions to text and graphics made in response to comments. These changes will be incorporated into the Preliminary General Plan and Draft Program EIR to be submitted to the State Parks Commission for approval.

2 List of Commenters

This chapter provides a list of all public comments received on the CPSRA Preliminary General Plan and Draft Program EIR during the public review period. Table 2-1 indicates the commenter/organization that submitted written comments and the date the comment(s) were received.

Table 2-1: List of Written Comments Received

Letter Number	Commenter	Agency/ Organization/ Individual Represented	Date Received
1	Maureen Gaffney, Bay Trail Planner	San Francisco Bay Trail	January 23, 2012
2	Elizabeth Goldstein, President	California State Parks Foundation	February 20, 2012
3	Michael Lynes, Conservation Director	Golden Gate Audubon Society	February 21, 2012
4	Board of Directors	Arc Ecology	February 21, 2012
5	Neil MacLean, Mary Jean Robertson, Tony Cerda	Costanoan Rumsen Carmel Tribe of Ohlone	February 21, 2012

3 Comments and Responses

This chapter provides a complete copy of the written comments received on the Preliminary General Plan/Draft EIR for the CPSRA, and presents responses to significant environmental issues raised in the comments, as required by CEQA Guidelines Section 15132. Comments pertaining to the Preliminary General Plan are also addressed.

Each letter received is reproduced in its entirety. The responses to comments directly follow each letter.

1

January 23, 2012

Marie Galvin, Project Manager
AECOM
150 Chestnut Street
San Francisco, CA 94111

Subject: Draft PEIR for Candlestick Point SRA Preliminary General Plan

The Bay Trail Project is a nonprofit organization administered by the Association of Bay Area Governments (ABAG) that plans, promotes and advocates for the implementation of a continuous 500-mile bicycling and hiking path around San Francisco Bay. When complete, the trail will pass through 47 cities, all nine Bay Area counties, and cross seven toll bridges. To date, slightly more than half the length of the Bay Trail alignment has been developed.

The Bay Trail Project sincerely appreciates the consistent, accurate reference and appropriate inclusion of the Bay Trail throughout the Preliminary General Plan PEIR. We are very excited that the Bay Trail will be fully developed through this area and look forward to working with AECOM, California State Parks, and the California State Parks Foundation to realize this vision. We have the following minor comments on the above-referenced document. 1-1

Updated Alignment

Figure 1-1 "Regional Location" shows an old alignment for the Bay Trail in the Hunters Point Shipyard and Candlestick Point area. In 2011, the Bay Trail Steering Committee removed the inland route from the alignment. The planned future alignment through Hunters Point Shipyard is located along the shoreline as opposed to through the middle of the site as shown on Figure 1-1. A map of the current adopted alignment in San Francisco is attached for your reference. On page 2-71, please strike reference to the inland route on Gilman, Arelious Walker, Carroll, Ingalls, Yosemite and Third Streets per the above and the attached map. 1-2

Trail Types

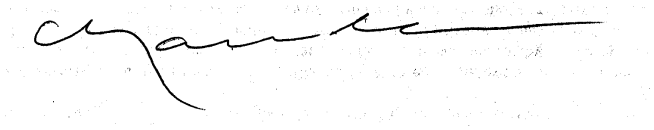
In the description of the San Francisco Bay Trail on page 2-71, the trail is described as consisting of "...paved multi-use paths, dirt trails, bike lanes, sidewalks, *or city streets signed as bike routes*" (emphasis added). A city street signed as a bike route is not part of the San Francisco Bay Trail, either as a "proposed" or "existing" segment. The ultimate goal/mission of the Bay Trail is a fully separated multi-use pathway as close to the shoreline as feasible. In certain instances where topography or existing incompatible land uses exist (Port of Oakland, SFO, military installations, etc.), the Bay Trail may be routed inland onto Class II bike lanes and sidewalks. This determination is made by the Bay Trail Steering Committee on a case-by-case basis. However, it is important to note that Class III bike routes are not considered an option. 1-3

Signage and Branding

We are pleased to see the Bay Trail specifically referenced in discussions regarding park branding and wayfinding signage. We look forward to working with State Parks and their consultants to integrate the Bay Trail seamlessly into the layout of Candlestick SRA. 1-4

Thank you for the opportunity to comment on this important project. If you have any questions about these comments or about the Bay Trail, please do not hesitate to contact me at (510) 464-7909 or by e-mail at maureeng@abag.ca.gov.

Sincerely,



Maureen Gaffney
Bay Trail Planner

Encl: 1

Golden Gate Bridge
Hwy 1
Hwy 101
Pacific Ocean
Fort Point
Marine Dr
Warming Hut
Hwy 101
Crissy Field
Wave Organ
Yacht Harbor
Marina Green
San Francisco Marina
Aquatic Park
Hyde St Pier
Alcatraz
Fisherman's Wharf
Vista Pier
Pier 39
Waterfront Park
Blue & Gold Fleet to Sausalito/ Tiburon
Vallejo Baylink Ferry
GGT Ferry to Larkspur
Blue & Gold Fleet to Tiburon
Blue & Gold/Vallejo Baylink Ferry
Lands End
China Beach
Baker Beach
Lincoln Blvd
Presidio
Crissy Field Center
Mason St
Marina
Palace of Fine Arts/ Exploratorium
Fort Mason
Ferry
North Point
Bay
Ghirardelli Square
Lombard
Telegraph Hill
New Exploratorium 2013
Coit Tower
Palace of the Legion of Honor
El Camino
Lake
Lobos Creek
Mountain Lake Park
Richmond
Geary
Pacific Heights
Russian Hill
Broadway
North Beach
Alta Plaza Park
Chinatown
Alameda/ Oakland Ferry
Ferry Building
Maritime Plaza
Justin Herman Plaza
Portsmouth Square
Embarcadero
See Treasure Island Insert
Golden Gate Park
University of San Francisco
Fulton
Masonic
McAllister
Union Square
Montgomery
Civic Center
Powell St
Yerba Buena Center
San Francisco Oakland Bay Bridge
Panhandle
Fell
Alamo Square
Haight Ashbury
Buena Vista Park
Oak
Lincoln
Sunset Blvd
Noriega
Sunset
University of San Francisco Medical Center
Stanyan
17th St
Market
13th St
Mission
Harrison
Bryant
Townsend
Division
4th & King
AT&T Park
South Beach Harbor
China Basin
China Basin Ferry Terminal
Mission Dolores Park
16th St
Mission Bay
17th St
Agua Vista Park
Twin Peaks
Twin Peaks 910ft
Noe Valley
Mission
24th St
Potrero Hill
22nd St
Central Basin
Warm Water Cove Park
Treasure Island
Glen Canyon Park
Cesar Chavez
Bernal Heights Park
BART
Bernal Heights
Islais Creek Channel
Evans
Cargo Way
Heron's Head Park
To Oakland
To San Francisco
Yerba Buena Island
Bridge Trail Opening 2013
Glen Park
Bayview
Phelps
Mendell
India Basin
India Basin Shoreline Park
India Basin Open Space Preserve
Alemany
Mission
Persia
McLaren Park
Paul Ave
Hunters Point
Hunters Point Naval Shipyard (Inactive)
Geneva
Bay View Park
Cow Palace
Sunnydale
Jamestown
Candlestick Park
Candlestick Point State Recreation Area
Bayshore
Harney
Beatty
Guadalupe Canyon Pkwy
Tunnel
Bayshore
San Bruno Mountain 1314 ft
Lagoon
Brisbane Lagoon
Serra Point Pkwy
San Francisco Bay
Brisbane
Bay Trail (off street)
Shared-use paved or gravel paths
Bay Trail (on street)
Bike lanes and sidewalks
Unimproved Bay Trail (off street)
Narrow path and/or rough surface
Unimproved Bay Trail (on street)
No bike lanes and/or no sidewalks
Planned Bay Trail
Future route – not developed
Boating/Marina
Parking
Fishing Pier
BayTrail
0 .5 mile 1 mile
0 1 km
N
2011

Comment Letter 1 – San Francisco Bay Trail Project

1-1. State Parks appreciates this comment and looks forward to continuing its working relationship with The Bay Trail Project during detailed design and implementation of the CPSRA General Plan.

1-2. and 1-3. Figure 1-1, Regional Location, on page 1-2 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised to show the current alignment of the Bay Trail. The revised map shows the currently adopted Bay Trail and does not include the planned portions of the Bay Trail. The revised map is shown on the following page.

In addition, the text included in the San Francisco Bay Trail discussion on page 2-71 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised to describe the current Bay Trail alignment along the shoreline, as follows:

> *San Francisco Bay Trail*
>
> The San Francisco Bay Trail is designed to create recreational pathway links to the various commercial, industrial, and residential neighborhoods that surround San Francisco Bay. In addition, the trail connects points of historic, natural, and cultural interest; recreational areas such as beaches, marinas, fishing piers, boat launches, and over 130 parks and wildlife preserves, totaling 57,000 acres of open space. At various locations, the Bay Trail consists of paved multi-use paths, dirt trails, Class II bike lanes, and sidewalks~~, or city streets signed as bike routes~~. Within the CPSRA vicinity, the Bay Trail has a discontinuous segment of existing, off-street pathway in the area of Candlestick Point and Harney Way. ~~The Bay Trail currently bridges the gap between Islais Creek and Candlestick Point with an inland route that shares portions of Gilman Avenue, Arelious Walker Drive, Carroll Avenue, Ingalls Street, Yosemite Avenue, and Third Street.~~ An unimproved, on-street segment of the Bay Trail extends from Harney Way west of CPSRA, under U.S. 101 to Sierra Point Parkway, near the intersection with Beatty Road. ~~exists in the southern part of CPSRA where public access improvements have been made, but the northern section is unimproved. The trail starts northeast of the US-101 northbound Harney Way ramps.~~

1-4. State Parks appreciates this comment and looks forward to continuing its working relationship with The Bay Trail Project during detailed design and implementation of the CPSRA General Plan.

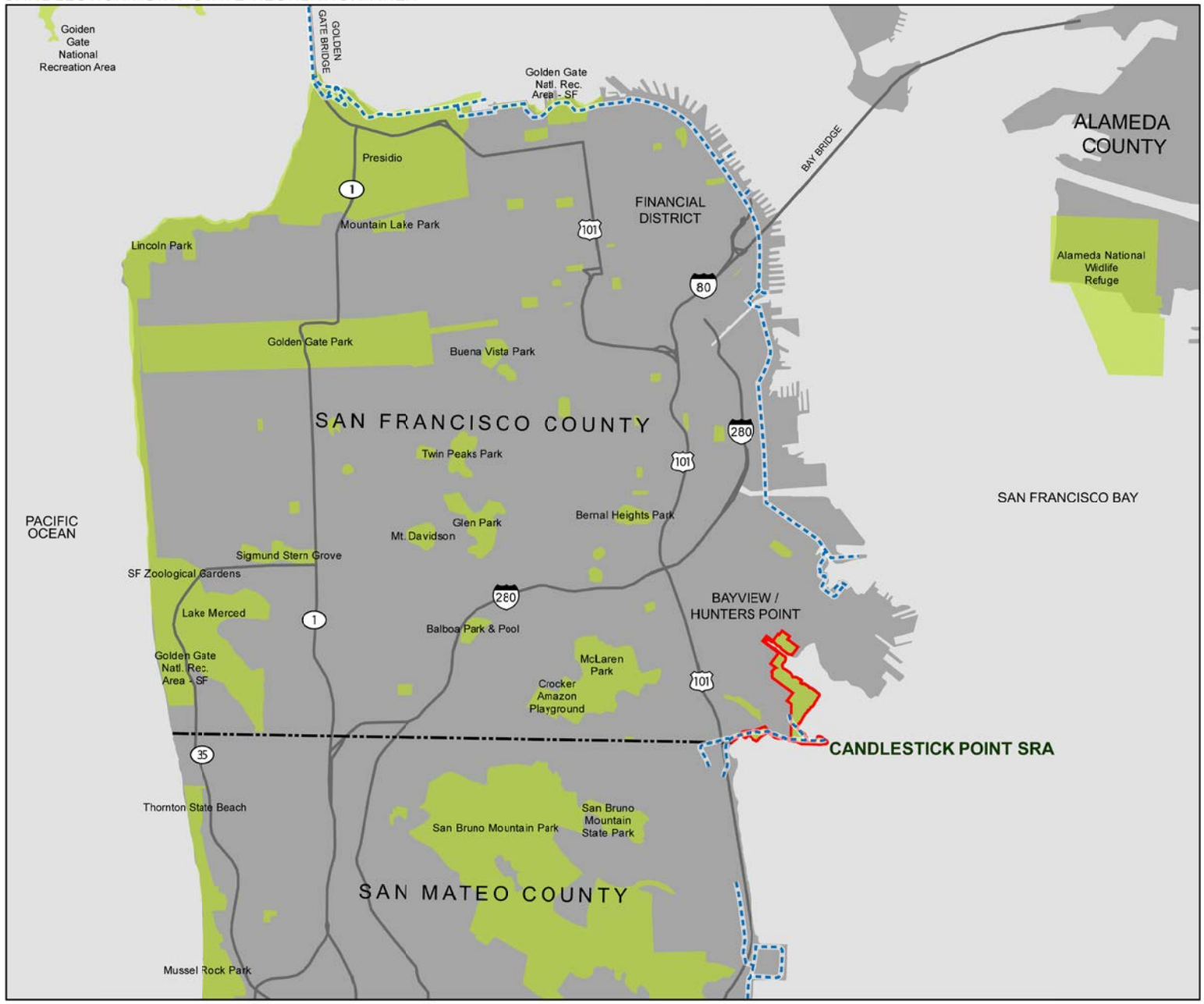


Figure 1-1
REGIONAL LOCATION

- Candlestick Point SRA Boundary (current)
- Major parks / open spaces
- Major roads
- Bay Trail

Extents of Main Map

0 2,750 5,500 11,000 Feet

Source: San Francisco Planning Department
04.10.12

AECOM

CALIFORNIA STATE PARKS FOUNDATION

2

February 20, 2012

Marie Galvin, Project Manager
AECOM
150 Chesnut Street
San Francisco, CA 94111

RE: Candlestick Point State Recreation Area Preliminary General Plan and Draft Program Environmental Impact Report, State Clearinghouse No. 2010012059

Dear Ms. Galvin:

The California State Parks Foundation (CSPF) is pleased to have this opportunity to comment on the Preliminary General Plan and Draft Program Environmental Impact Report for Candlestick Point State Recreation Area ("DEIR"). CSPF, which was established in 1969, is an independent non-profit organization that currently has over 130,000 members throughout California. It is our mission to protect, enhance and advocate for California State Parks. The Board of Trustees of CSPF, through its strategic planning process, has given special emphasis to the need for urban parks that are accessible to traditionally underserved communities. Candlestick Point State Recreation Area ("Candlestick") fits that paradigm.

As a result, CSPF has been involved in the evolution of this urban park for many years. In particular, CSPF has raised $14.2 million to-date for a restoration of Yosemite Slough ("the Slough") wetlands (the "Restoration Project"). Work on the north side of the Slough is nearly complete, and design work and fundraising for the south side of the Slough is actively underway. In addition, CSPF has negotiated and executed an agreement with Lennar Urban, Inc., concerning the design of the proposed bridge across the Slough. Thus, CSPF has a deep and abiding interest in this particular park.

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www.calparks.org

Your Voice for Parks

Printed on Recycled Paper

CSPF is very impressed with the breadth and tenor of the DEIR. We believe it bodes well for Candlestick that the guiding planning document for the park is so well-written. We do have a number of comments that we hope will serve to improve an already excellent plan. 2-1

Yosemite Slough is particularly important because of both the wetlands restoration that is currently underway there, and the proposed bridge that will run across the mouth of the Slough in the future. Therefore, a more thorough analysis of Yosemite Slough is needed in the following chapters of the DEIR:

2-2

1. Chapter 2, Existing Conditions: In Section 2.1.5, "Recreation Resources," the Restoration Project is accurately described on p. 2-50, including a reference to the interpretive center that has been part of the Restoration Project from the very beginning. However, in the "Concept Master Plan" (Appendix C) the interpretive center is not shown on the map. This significant omission should be corrected.

2. Chapter 3, Issues and Analysis: In Section 3.1, "Planning Assumptions," the DEIR states that "The Yosemite Slough Restoration Project will move forward as planned." The Slough is briefly mentioned elsewhere in other contexts, such as the construction of the Bay Trail (p. 3-10), extension of wetlands habitat into the South Basin shoreline (p. 3-12), flooding risks (p.3-15), visitor safety (p. 3.-17), interpretive walks (p.3-18), PORTS (p. 3-20), etc. Interpretive opportunities are presented in slightly more detail on p.3-22, and existing partnerships are again described on p. 3-26.

   Section 3.2.2, "Access and Linkages," contains an extensive discussion of parking issues, along with discussions of Bay access, alternative transportation, wayfinding and regional trails. However, this section does not address the issue of public access to the Restoration Project via the south side of the Slough. As currently envisioned in the Concept Master Plan, the south side of the Slough along Carroll Street does not adequately allow for sufficient public access. People from the surrounding community wishing to access the wetlands will be blocked along the entire boundary on Carroll by fencing and/or buildings bordering the community garden and staff parking lot. Any possible access along Arelious Walker will be completely blocked by the planned bridge, as indicated on the Concept Master Plan. A modest amount of public parking is provided in a long, narrow strip along west edge of the facility, with a straight path running parallel with the parking strip about half-way into the wetland area. There is no turnaround for buses or other school vehicles, no viewing areas, and other than an informational kiosk, no interpretation of the restored wetlands area. 2-3

   CSPF is strongly convinced that access for the community to the restored wetlands on the south side Slough is key to the integrity of the Restoration Project. One of the primary objectives of the Restoration Project is to make the Slough accessible to visitors and serve Bayview Hunters Point, a community that has been unfairly impacted by environmental

degradation. The goal and objectives of the Restoration Project include the following:

- *Improve the quality of life for the surrounding community by creating a clean, beautiful local park for viewing wildlife habitat*
- *Create an environmental area that local schools can use for field trips.*[1]

2-3

The public access described in the DEIR is inadequate to meet these goals. It is critical that public access on the south side of the Slough be clearly delineated as an issue in Chapter 3 to ensure full and adequate analysis and consideration moving forward.

In addition, public access throughout the entire park could be better and more thoroughly addressed in the DEIR. The manner in which park borders are permeable and/or diffuse should be explicitly addressed in discussing public access. The only place in the entire DEIR where permeability of border is mentioned is on p. 4-48, in the context of the need for increased staff to " … coordinate access, circulation, and parking to provide a high quality visitor experience and minimize impacts to park resources and character."

2-4

Any relevant public access plans from other entities, such as the City of San Francisco, should be specifically referenced. Regional planning documents are listed in Section 2.6.3, including the San Francisco General Plan and the Bayview Hunters Point Area Plan, but beyond a brief reference to "policies … to improve … pedestrian access" to the park, there is no meaningful discussion of the provisions or restrictions that might be contained in regional planning documents.

2-5

In Section 3.2.3, "Sea Level Rise," the Slough is described as an area of the park that would benefit from an adaptive management approach. The DEIR does not acknowledge or describe extensive discussions that have taken place between CSPF and California State Parks on the topic of the implications of sea level rise on the Restoration Project. Nor does it incorporate the summary letter dated November 10, 2009, which contains "the methods, results, and potential habitat implications of … potential future sea level rise for the Yosemite Slough Wetland Restoration project," written by Noble Consultants, Inc., in cooperation with California State Parks, which provided sea level rise rate projections and described an innovative methodology for managing future sea level rise (the "Sea Level Rise Adaptive Management Plan"). The Sea Level Rise Adaptive Management Plan was presented to California State Park staff at a meeting on January 29, 2010. Present at the meeting were Ruth Coleman, Director of California State Parks, and Dan Ray, then-Chief of Planning, among others. The Sea Level Rise Adaptive Management Plan is attached to this comment letter as Exhibit A.

2-6

[1] http://www.calparks.org/programs/improving/candlestick-point-state.html

On p. 3-27, the Restoration Project is mentioned in Section 3.3.1, which describes the phases and features of the Restoration Project. Unfortunately, the information contained in Section 3.3.1 is inaccurate. "Phase 1" is currently underway, as described in the previous Chapter. However, the next phase of work is planned for the south side of the Slough, not the upland area on the north side of the Slough described as "Phase 2" in Section 3.3.1. See, Phasing Map attached as Exhibit B to this letter. 2-7

Section 3.3.2 is the only substantive mention of the proposed bridge across the mouth of the Slough. The description of the bridge is accurate; the description of the relationship between Lennar and CSPF should be amended to reflect that an agreement has been entered into between the parties. 2-8

Section 3.4, 'Assumptions for Future Scenario without the Candlestick Point-Hunters Point Shipyard Phase II Project," simply repeats the statement found in Section 3.1 – that the Project Restoration will move forward as planned.

We believe that a more extensive assessment and analysis of the Restoration Project would be very beneficial to future planning processes. Issues not addressed in Chapter 3 should include the Sea Level Rise Adaptive Management Plan described above, and should address the public access issue on the south side of the Slough and throughout the park. 2-9

3. Chapter 4, "Park Plan": CSPF does not object to the consideration of Natural Preserve status recommended for consideration once the Restoration Project is completed (p. 4-3). However, as addressed above, public access is a critical component of the Restoration Project, and any special designation must address the way the community and park visitors can successfully view and access the wetlands. 2-10

The designation of the 12 acres of restored wetlands as a "Tidal Marsh Zone" in Section 4.3.1 is appropriate. 2-11

In Section 4.4.1, a general vision for the Slough is described. The only reference to public access is the following sentence, on p. 4-8: "Design of this area would include a key pedestrian access point to link Yosemite Slough with the nearby Alice Griffith housing development." The Alice Griffith housing development is located on the south side of the Slough, but Section 4.4.1 does not substantively address any planning priorities or proposals for pedestrian access, such as location, configuration, or size. The Park Plan must include adequate pedestrian access on both sides of the Slough with sufficient specificity to guide future planning efforts. 2-12

In addition, the interpretive center should be specifically referenced in Section 4.4.1. The reference to "interpretive program area/pavilion" as a possible new structure does not accurately describe the proposed interpretive center on the north side upland area. It may be 2-13

assumed that the "interpretive program area/pavilion" is referring to a separate and distinct structure to be constructed on the south basin shoreline and not to the Slough north upland interpretive center at all. This ambiguity needs to be resolved, as noted below in the discussion on Section 4.6.1. 2-13

Section 4.5.2 addresses sea level rise impacts for the park overall, without reference to the Slough. Inclusion of the Sea Level Rise Adaptive Management Plan may be appropriate in this section. 2-14

Moving on to Section 4.6, which addresses six goals and guidelines for the park overall, CSPF commends California State Parks for their thoughtful and inclusive planning efforts for the future There are a few references or omissions that should be addressed. 2-15

- Section 4.6.1 lays out guidelines for the visitor experience. However, missing from the discussion is any reference to the role of the interpretive center projected to be built on the upland north side of the Slough as part of the Restoration Project. The interpretive center is acknowledged early in the DEIR on page 2-50, but is not discussed in this section, nor, as noted above, is it sited on the Concept Master Plan. Among other very specific planning guidelines, Guideline Visitor Facilities-16 describes the outdoor classroom planned for the south basin shoreline. Thus, the omission of the interpretive center at the Slough is all the more striking. Planning for appropriate use of the interpretive center should be an important part of the park plan and needs to be included in the DEIR. 2-16
- Section 4.6.2 deals with recreation. In the section entitled "Trails/Routes" there is no mention of public access to the Slough or, for that matter, the entire park, other than a general reference in Guidelines Trails 3 to "encouraging connections" between the park and other open space resources. It would be appropriate create planning goals and guidelines for public access in this section. 2-17
- Section 4.6.3 addresses the Park Plan for Natural Resources. Guideline Shoreline 9, relates to sea level rise, and the goals set forth in that section are entirely acceptable. However, this section does not reference the Sea Level Rise Adaptive Management Plan. The Sea Level Rise Adaptive Management Plan, which was developed collaboratively with California State Parks, should be integrated into the DEIR and considered as one of the viable alternatives for any adaptable sea level rise management planning process. 2-18
- Section 4.6.4 addresses Community and Cultural Resources. The goals and guidelines laid out in this section are outstanding. They could be further enhanced by reference to public access, since the ability to easily enter and use the park is key to all of the goals and guidelines set forth in this section. 2-19
- Section 4.6.5 discusses Interpretation and Education. CSPF is very pleased to see that the Slough is included in this discussion, and that the valuable natural resources and historical/cultural aspects of the area are integrated into the various interpretive themes described in this section. However, as noted above, the exclusion of the interpretive center at the Slough must be remedied in this section as well as the others noted above. 2-20

- Section 4.6.6 discusses the operation of the park. Again – the interpretive center, and the corresponding need for interpretive staff, is not addressed in this section, though the need for staff in several other contexts is addressed throughout this section (see pp 4-47, 4-49, and 4-53). On p. 4-55, under the "Agreements" section, the agreement with CSPF for the Restoration Project is accurately described. However, the agreement that CSPF has reached with Lennar Urban is not included in this section. This agreement, which governs both the design and the process related to permitting the proposed bridge across the mouth of Yosemite Slough, is not mentioned in this section. This agreement should be referenced, as it is relevant to future planning efforts. 2-21

Section 4.7 deals with zone-specific goals and guidelines. CSPF's comments on this section are limited to pointing out the areas where inclusion of the Plan or the interpretive center would be relevant: 2-22

- Section 4.7.1, Guideline Tidal Marsh-6.
- Section 4.7.4, Goal Active Recreation Zone-1.

Thank you for the opportunity to make these comments.

Sincerely,

Elizabeth Goldstein
President
California State Parks Foundation

Enc.

Cc: Sara Feldman, Vice President of Programs, California State Parks Foundation
Cecille Caterson, Program Manager, California State Parks Foundation

California State Parks Foundation's Comments on the Candlestick Point State Recreation Area Preliminary General Plan and Draft Program Environmental Impact Report

EXHIBIT A

November 10, 2009 882-02

George J. Salvaggio, Jr.
WRA, Inc.
2169-G East Francisco Blvd.
San Rafael, CA 94901

Re: **Summary Letter**
Yosemite Slough Sea Level Rise Evaluation
San Francisco County, CA

Dear Mr. Salvaggio:

We are pleased to submit this summary letter to you with the methods, results, and potential habitat implications of our evaluation of potential future sea level rise for the Yosemite Slough Wetland Restoration project, located in San Francisco County, California.

Scope of Work

Our scope of work consisted of four tasks: (1) Identification of projected sea level elevations for four time periods (20-yrs, 35-yrs, 55-yrs, and 71-yrs which is the time period coincident with a sea level rise of 1 meter) based on the California Energy Commission Public Interest Energy Research reports; (2) modeling of the projected habitat areas (and associated acreages) based on the proposed restoration grading and projected future sea level rise increments; (3) a cursory evaluation of wave runup at the site; (4) preparation of this summary letter; and (5) communications with your office.

Projected Sea Level Elevation Analyses

Sea level rise rate recommendations from the San Francisco Bay Conservation and Development Commission (BCDC), the U.S. Army Corps of Engineers (USACE), and the California Energy Commission Public Interest Energy Research (PIER) Program were reviewed (Table 1) as part of our evaluation of sea level rise. The PIER report ("Potential Inundation Due to Rising Sea Levels in the San Francisco Bay Region" (CEC-500-2009-023-F)) was prepared by Noah Knowles of the U.S. Geological Survey (USGS).

The PIER sea level rise projections were developed using a series of climate change models (SRES A1fi, SRES A2, SRES B1) that estimate (with adjustment for effects of dam/water storage) a range of potential global sea level rise in 2100 of 1.9 ft (minimum) to 3.4 ft (maximum). The BCDC and PIER recommended sea level rise rates are near the maximum

predicted projections. The USACE sea level rise projection appears to follow the minimum predicted sea level rise scenario. A comparison of the sea level rise recommendations from BCDC, USACE, and PIER is presented in Figure 1.

Table 1. Sea Level Rise Rate Reports Reviewed

Title	Author	Date
Draft Staff Report, Living with a Rising Bay: Vulnerability and Adaptation in San Francisco Bay and on its Shoreline.	San Francisco Bay Conservation and Development Commission (BCDC)	April 7, 2009
Potential Inundation Due to Rising Sea Levels in the San Francisco Bay Region (CEC-500-2009-023-F)	Noah, Knowles, U.S. Geological Survey (USGS) (through the PIER program)	August 2009
Climate Change Scenarios and Sea Level Rise Estimates for the California 2009 Climate Change Scenario Assessment (CEC-500-2009-014-F)	Dan Cayan et al.	August 2009
Water Resources Policies and Authorities, Incorporating Sea-Level Change Considerations in Civil Works Programs (EC 1165-2-211)	U.S. Army Corps of Engineers (USACE)	July 1, 2009

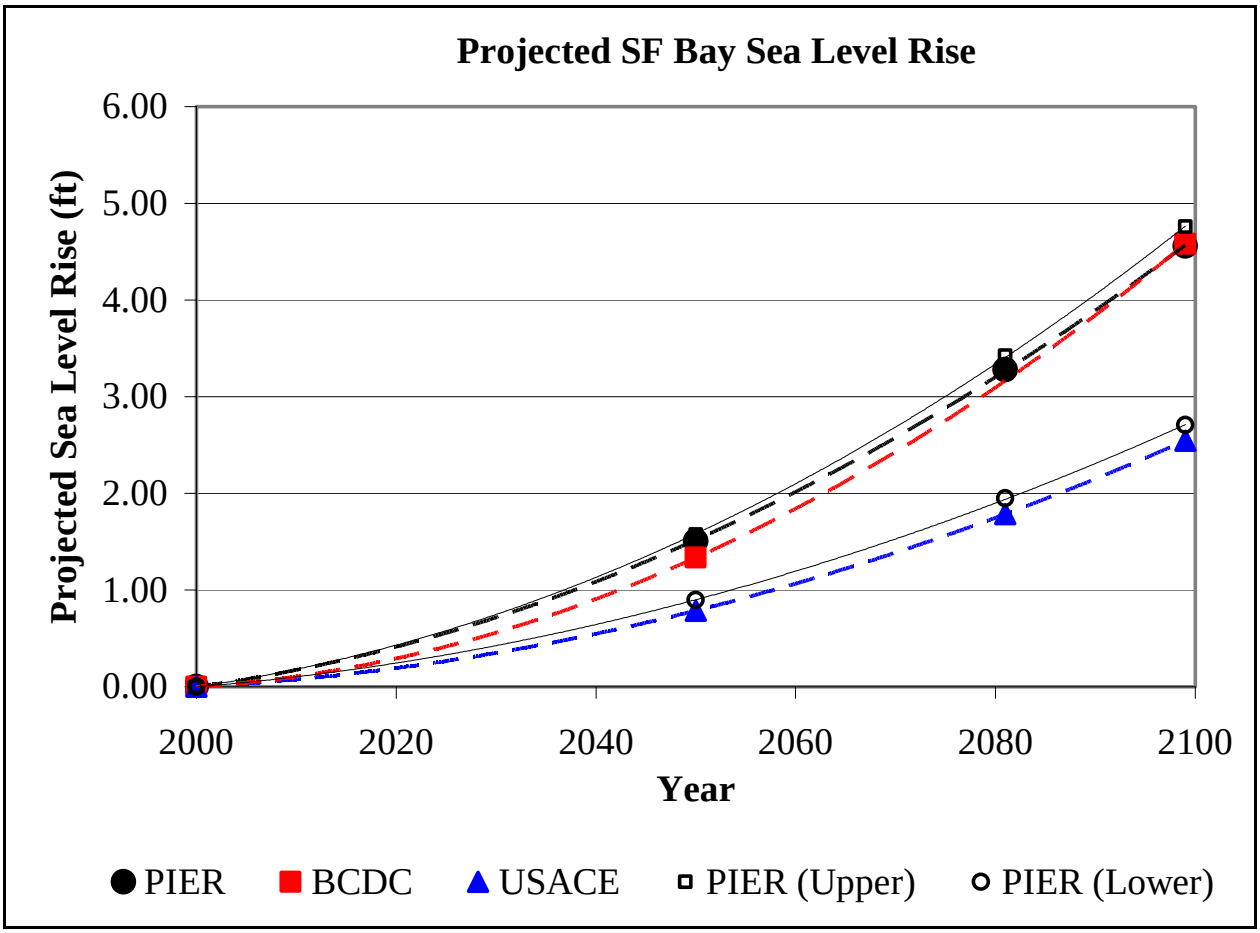


Figure 1. Projected sea level rise in SF Bay.

For our evaluation, future sea level elevations were calculated using sea level rise rate estimates reported by Knowles ((“Potential Inundation Due to Rising Sea Levels in the San Francisco Bay Region” (CEC-500-2009-023-F)) and will be referred to as the PIER Recommended scenario.

Projected sea level was calculated for 2030 (20-yr), 2045 (35-yr), and 2065 (55-yr), and 2081 (71-yr). The year 2081 (71-year) scenario corresponds to a one (1) meter increase in sea level.

A mean sea level elevation of +3.2 ft (NAVD88) was assumed for the base year of 2010 (based on NOAA tidal datum at the Alameda Tide Station No. 9414750). Table 2 presents the projected increase in sea level using the high, recommended, and low rates published by PIER.

Table 2. Projected Sea Level Rise (ft) and [Projected Mean Sea Level in (ft, NAVD88)]

Year	PIER-Upper	PIER Recommended	PIER-Lower
2010	N.A. [3.2]	**N.A. [3.2]**	N.A. [3.2]
2030	+ 0.75 [4.0]	**+ 0.72 [3.9]**	+ 0.43 [3.6]
2045	+ 1.35 [4.6]	**+ 1.30 [4.5]**	+ 0.77 [4.0]
2065	+ 2.39 [5.6]	**+ 2.29 [5.5]**	+ 1.36 [4.6]
2081	+ 3.41 [6.6]	**+ 3.27 [6.6]**	+ 1.94 [5.1]

Habitat Response Modeling

Our modeling of the projected habitat areas considered future sea level rise, uncertainty in the sea level rise estimates, and evaluated the potential benefits of natural sediment accumulation in the wetland area over time. Projected habitat type zones (and associated acreages) were based on the proposed restoration grading plans[1].

Five habitat areas were defined by WRA as Mudflat, Low Marsh, Mid Marsh, High Marsh, and Transition Zone. Lower and upper elevation ranges were established by WRA[2] for each habitat type (based on field surveys in 2006). Our analyses assumed that these habitat ranges would migrate (linearly) up in elevation in response to sea level rise. The projected elevation ranges, based on the evaluation years, for each habitat type are shown in Table 3.

Table 3. Summary of Projected Habitat Type Elevations (ft, NAVD88)

	2010		2030		2045		2065		2081	
Habitat	**Low**	**High**	**Low**	**High**	**Low**	**High**	**Low**	**High**	**Low**	**High**
Mean Sea Level	*3.2*		*3.9*		*4.5*		*5.5*		6.6	
Mudflat	4.0	4.8	4.0	5.5	4.0	6.1	4.0	7.0	4.0	8.0
Low Marsh	4.8	5.8	5.5	6.5	6.1	7.1	7.0	8.0	8.0	9.0
Mid Marsh	5.8	6.5	6.5	7.2	7.1	7.8	8.0	8.8	9.0	9.8
High Marsh	6.5	7.0	7.2	7.7	7.8	8.3	8.8	9.3	9.8	10.3
Transition Zone	7.0	8.5	7.7	9.2	8.3	9.8	9.3	10.8	10.3	11.8

[1] “Candlestick Point State Park, Yosemite Slough Restoration.” Plans Prepared by Noble Consultants, Inc. Dated June 16, 2009. Sheets C-5 to C-9.
[2] “Yosemite Slough Restoration Project – Team Coordination, October 2009” prepared by WRA Environmental Consultants

To evaluate the impact associated with sea level rise for each of the habitat regimes, we calculated the projected area for each habitat type in years 2010, 2030, 2045, 2065, and 2081. A TIN was generated based on the proposed grading plan[1] to create a surface from which area calculations were made. The 2D area associated with the habitat type was calculated as the difference in area based on a plane situated at the habitat "high" elevation minus the habitat "low" elevation. Table 4 summarizes the projected habitat area over time.

Table 4. Summary of Projected Habitat Type Area (Acres)

Habitat Type	2010	2030	2045	2065	2081
Mudflat	0.9	1.5	3.6	7.2	7.7
Low Marsh	1.1	3.7	3.6	0.5	0.3
Mid Marsh	3.2	2.1	0.4	0.3	0.3
High Marsh	2.0	0.3	0.2	0.2	0.2
Transition Zone	0.7	0.6	0.5	0.5	0.5

Our analyses found that the recommended sea level rise rates result in a significant expansion of mudflat habitat and a major decrease in low marsh, mid marsh, and high marsh habitat types. We found only a minor change in the transition zone habitat, due mainly to the fact that the planned transition zone habitat was situated on the steeper wetland perimeter side slopes. Figure 1 presents a graphic summary of the projected habitat distributions (by year) for the recommended sea level rise rate.

We note that there is uncertainty associated with the sea level rise rate projections. Figure 2 presents a graphic summary of habitat response in the year 2081 (which corresponds to one (1) meter of sea level rise) based on the PIER report high estimate, recommended estimate, and the low estimate. Table 5 summarizes the projected habitat area in 2081 based on the PIER report high estimate, recommended estimate, and the low estimate. Much more habitat diversity is observed at the lower sea level rise estimate as compared with the high sea level rise estimate.

Table 5. Variability in Habitat Response Based on Uncertainties in Projected Sea Level Rise

Habitat Type	High Estimate (acres)	Recommended Estimate (acres)	Low Estimate (acres)
Mudflat	7.8	7.7	6.0
Low Marsh	0.4	0.3	1.6
Mid Marsh	0.2	0.3	0.3
High Marsh	0.2	0.2	0.2
Transition Zone	0.5	0.5	0.5

In addition to the uncertainty in sea level rise, there is also uncertainty in wetland aggradation rates. Figure 3 presents a graphic summary of habitat response in the year 2081 based on the PIER report sea level rise high estimate, recommended estimate, and the low estimate, with an annual sedimentation rate of 0.5 cm/yr[3]. Habitat type areas were calculated using the projected habitat elevation distributions minus the projected sedimentation depth of 1.2 ft (0.5 cm/yr x 71

[3] "Hydrodynamic Modeling, Wave Analysis, and Sedimentation Evaluation for the Yosemite Canal Wetland Restoration Project, San Francisco, California." Prepared by Noble Consultants, Inc. Dated September 2005.

yrs). Table 6 summarizes the projected habitat area in 2081 based on the PIER report sea level rise high estimate, recommended estimate, and the low estimate, with inclusion of sedimentation effects.

Table 6. Variability in Habitat Response Based on Uncertainties in Projected Sea Level Rise and Sedimentation Effects

Habitat Type	High Estimate (acres)	Recommended Estimate (acres)	Low Estimate (acres)
Mudflat	7.2	6.8	3.2
Low Marsh	0.5	0.9	3.9
Mid Marsh	0.2	0.3	0.4
High Marsh	0.2	0.2	0.2
Transition Zone	0.5	0.5	0.5

Wave Runup

Sea level rise and associated wave runup may also impact structural park improvements (i.e. stillwater levels and/or wave runup may exceed the elevation of the top of the bank and inundate the public path that goes along the perimeter of the two basins). A wave runup analysis was performed using projected 50-year return period wave conditions[3] to evaluate the potential impact of sea level rise and storm conditions. The following criteria were used in the analysis:

- Embankment slope of 5:1 (horizontal:vertical).
- Slope roughness coefficient
  - Bare slope = 1.0
  - Vegetated slope = 0.65
- Top of bank
  - Northwest basin: El. +16 ft NAVD88
  - Northeast basin: El. +12-16 ft NAVD88
- Wave conditions (Figure 6-9[3])
  - Northwest basin: H (height) = 0.4 ft, T (period) = 4 s
  - Northeast basin H = 0.4-0.7 ft, T = 4 s
- Wave conditions (wind generated within South Basin from northwest)
  - Northwest basin: not exposed
  - Northeast basin: H = 0.7 ft, T =1 seconds
- Stillwater level of El. +11.7 ft NAVD88.
  - 50 year return Hunters Point water level of El. +9.5 ft MLLW (Corps of Engineers[4]) plus projected rise of 0.1 ft from 1980 to 2000 plus projected rise of 2.4 ft – 0.3 feet adjustment to NAVD88.

The results of the wave runup analysis are shown in Table 7.

[4] "San Francisco Bay Tidal Stage vs. Frequency Study." Prepared by the U.S Army Corps of Engineers, San Francisco District. Dated October 1984.

Table 7. Wave Runup Elevation (ft, NAVD88)

Basin	Wave Height (ft) [Wave Period (sec)]		
	0.4 [4.0]	0.7 [4.0]	0.7 [1.0]
Northwest			
Bare slope	12.9	NA	NA
Vegetated slope	12.5	NA	NA
Northeast			
Bare slope	12.9	13.4	12.2
Vegetated slope	12.5	12.8	12.1

The results indicate that the top of the bank in the Northwest basin will not be inundated during the 50-year wave event after 55 years of projected sea level rise. The top of the bank is at Elevation + 16.0 ft (NAVD88) and the highest calculated wave runup is El. + 12.9 ft (NAVD88) for a bare slope, with lower runup for a vegetated slope.

The majority of the top of the bank in the Northeast basin is between El. +13.0 to +16.0 ft (NAVD88). The top of the bank slopes down to an elevation of +12.0 ft (NAVD88) to meet the grades on the adjacent property to the south. Except for a segment along the slough's edge, the lowest wetland area is relatively protected from wave exposure. The calculated runup ranges between El. +12.2 to +13.4 ft (NAVD88) for a bare slope, and ranges between +12.1 to +12.8 ft (NAVD88) for a vegetated slope. Therefore, it is expected that wave runup will overtop the bank along the edge of the slough during a 50-year wave event after 55 years of projected sea level rise, but that most of the Northeast bank will not be overtopped.

Closure

Our services consist of professional opinions, conclusions, and recommendations that are made in accordance with generally accepted engineering principles and practices. This warranty is in lieu of all other warranties, either expressed or implied.

We appreciate this opportunity to be of continued service to WRA. Please feel free to contact me with any comments or questions by phone (415-884-0727 ext. 204) or via email at rstoresund@nobleconsultants.com.

Sincerely,

NOBLE CONSULTANTS, INC.

Scott M. Noble, P.E.
Vice President & Principal Engineer

Rune Storesund, D.Eng., P.E.
Senior Engineer

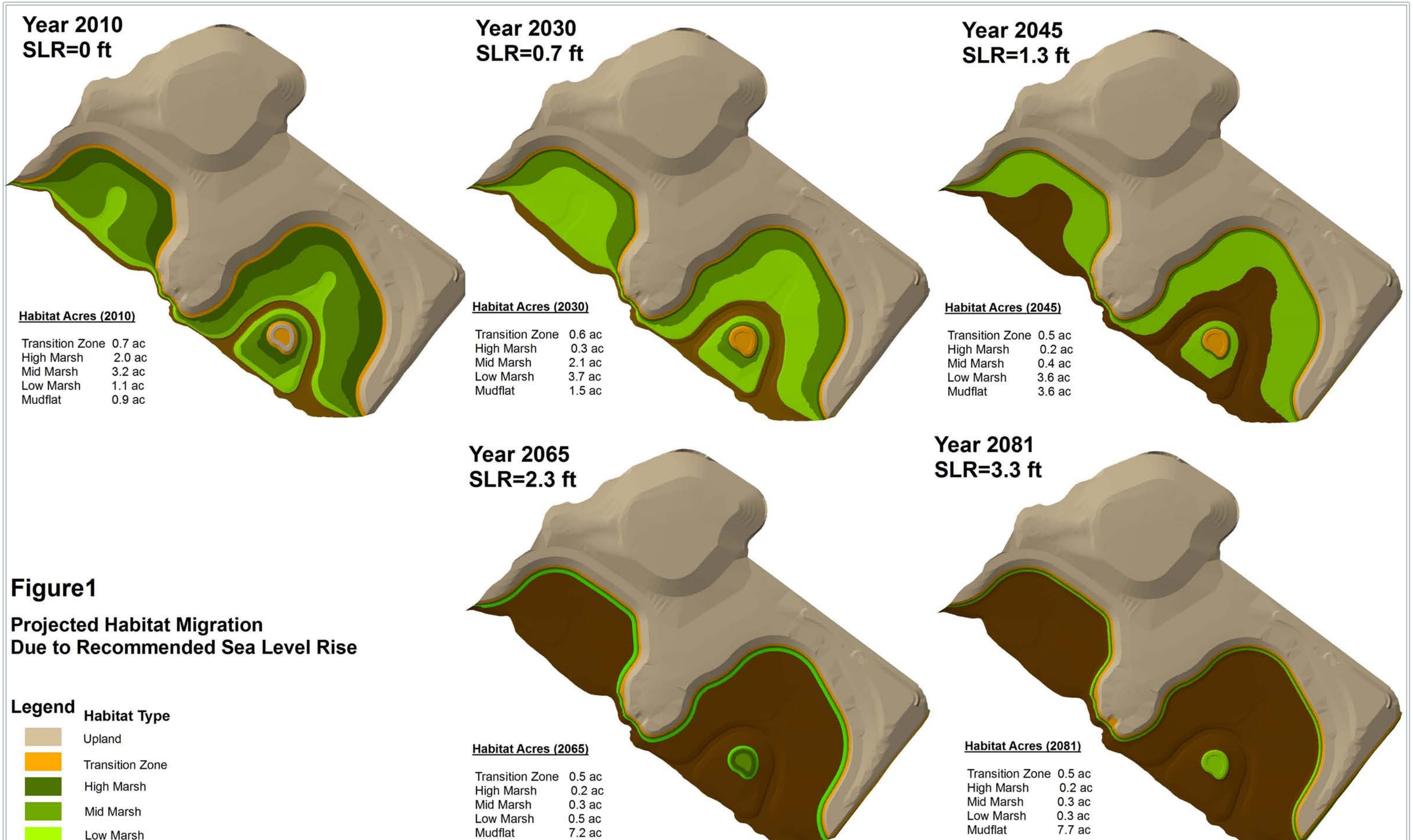


Figure1

Projected Habitat Migration Due to Recommended Sea Level Rise

Legend

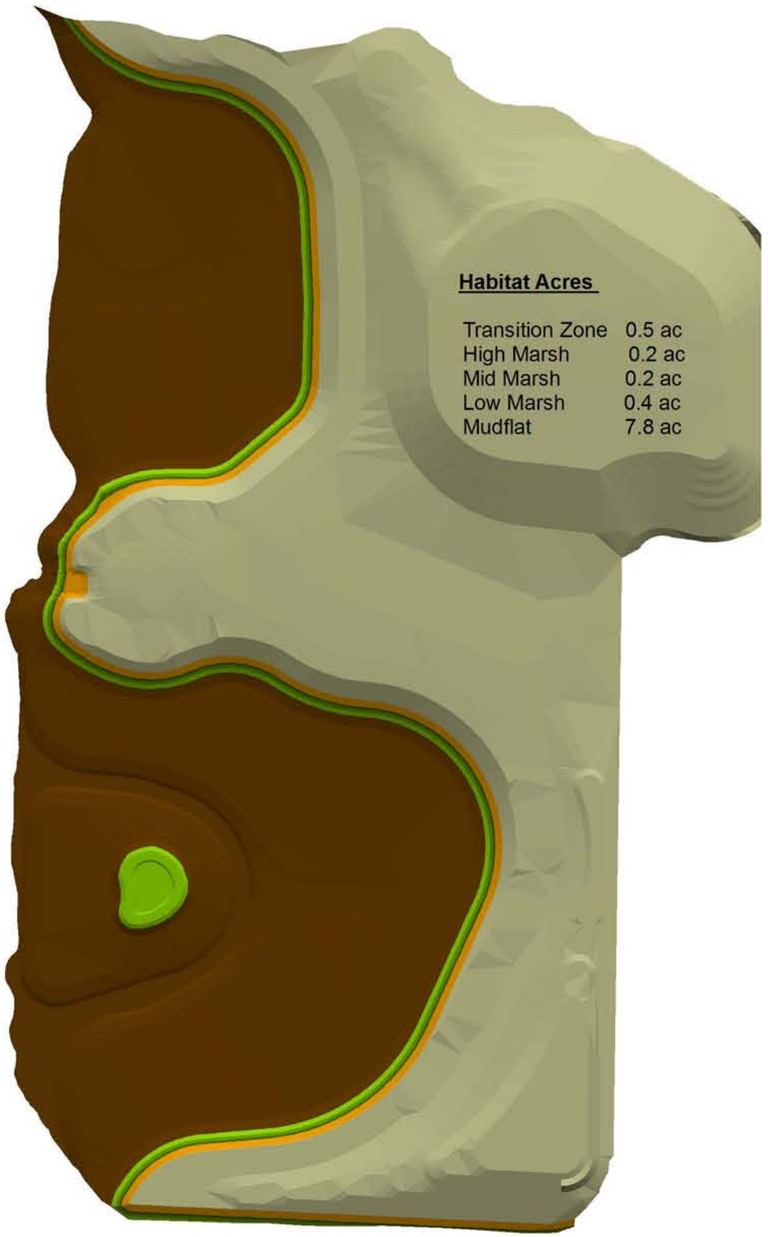
Habitat Type

- Upland
- Transition Zone
- High Marsh
- Mid Marsh
- Low Marsh
- Mudflat

Sea Level Rise Estimates from: Knowles, Noah. "Potential Inundation Due to Sea Levels in the San Francisco Bay Region - Final Paper." CEC-500-2009-023-F. August 2009.

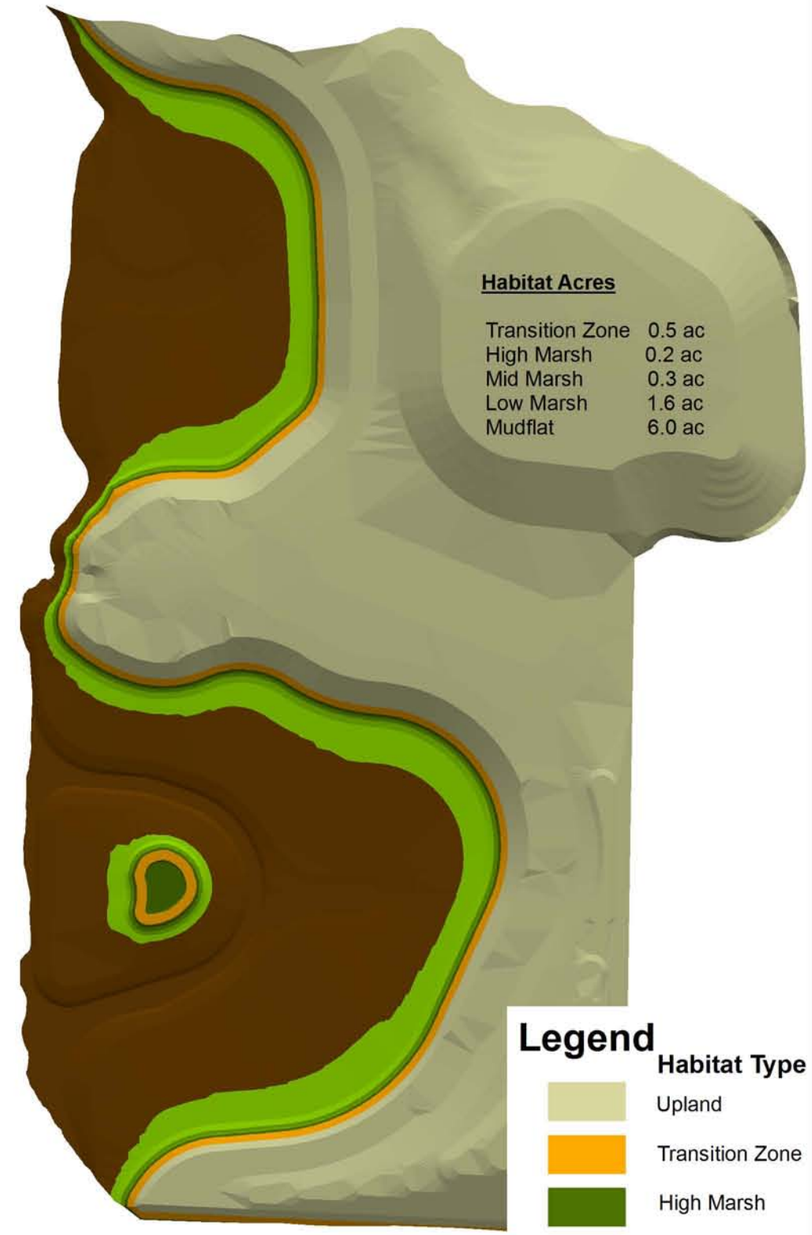
NOBLE CONSULTANTS, INC.

Year 2081 - High Estimate
SLR=3.4 ft



Year 2081 - Recommended Estimate
SLR=3.3 ft

Year 2081 - Low Estimate
SLR=1.9 ft



Legend

Habitat Type

- Upland
- Transition Zone
- High Marsh
- Mid Marsh
- Low Marsh
- Mudflat

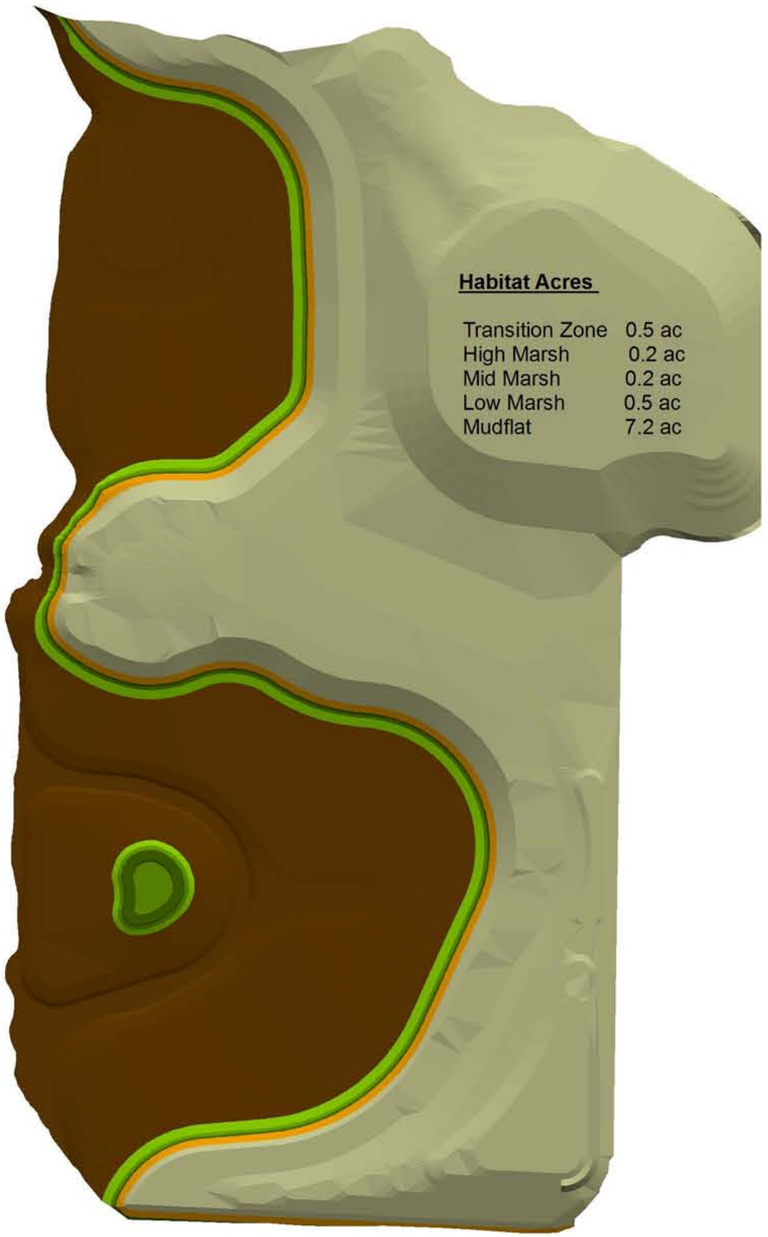
Figure 2

Variability in Habitat Response Based on Estimated Sea Level Rise Uncertainty

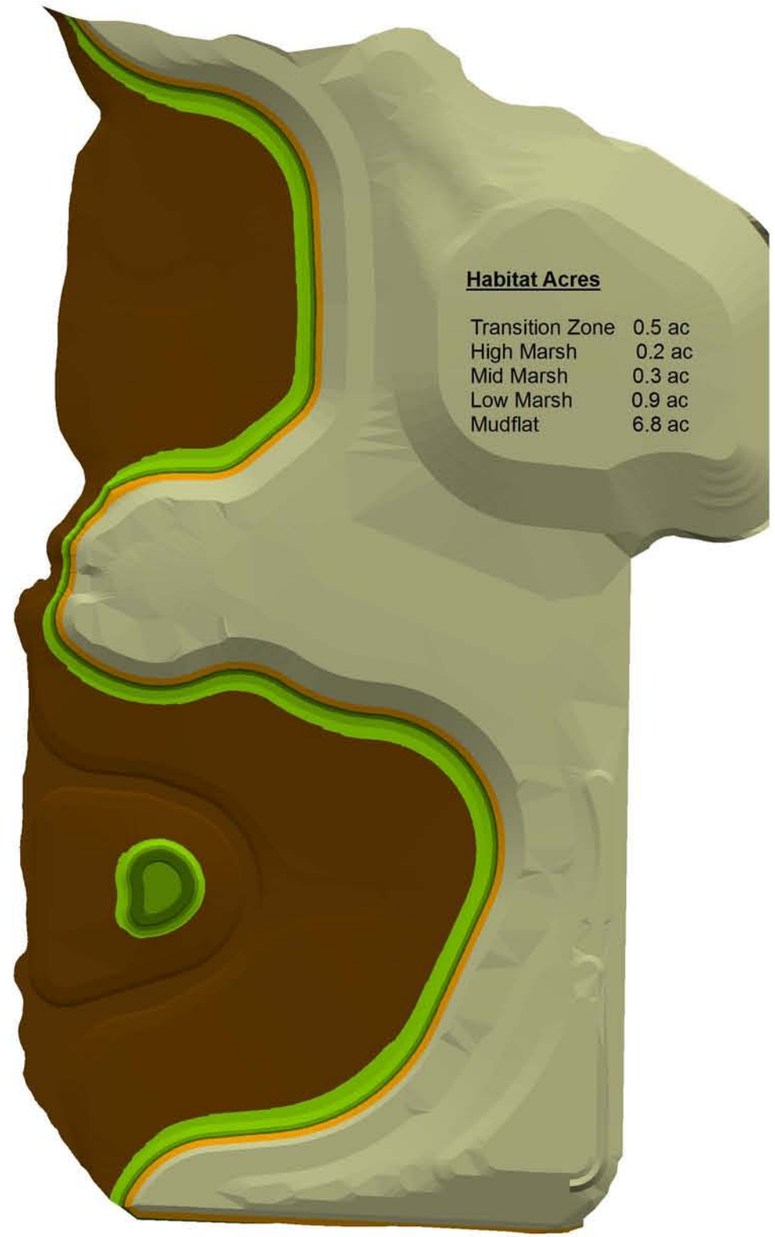
Sea Level Rise Estimates from: Knowles, Noah. "Potential Inundation Due to Sea Levels in the San Francisco Bay Region - Final Paper." CEC-500-2009-023-F. August 2009.

NOBLE CONSULTANTS, INC.

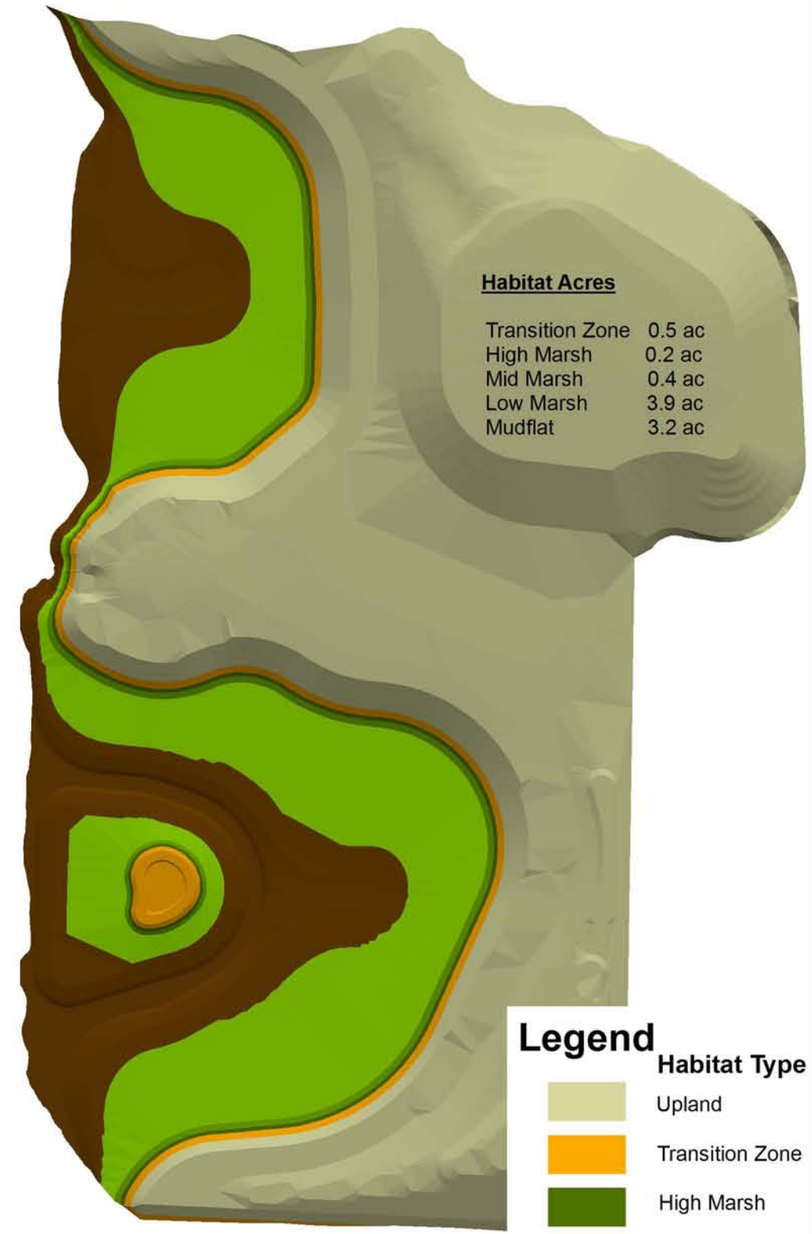
Year 2081 - High Estimate
SLR=3.4 ft



Year 2081 - Recommended Estimate
SLR=3.3 ft



Year 2081 - Low Estimate
SLR=1.9 ft



Legend

Habitat Type

- Upland
- Transition Zone
- High Marsh
- Mid Marsh
- Low Marsh
- Mudflat

Figure 3

Variability in Habitat Response Based on Estimated Sea Level Rise Uncertainty With Natural Sedimentation

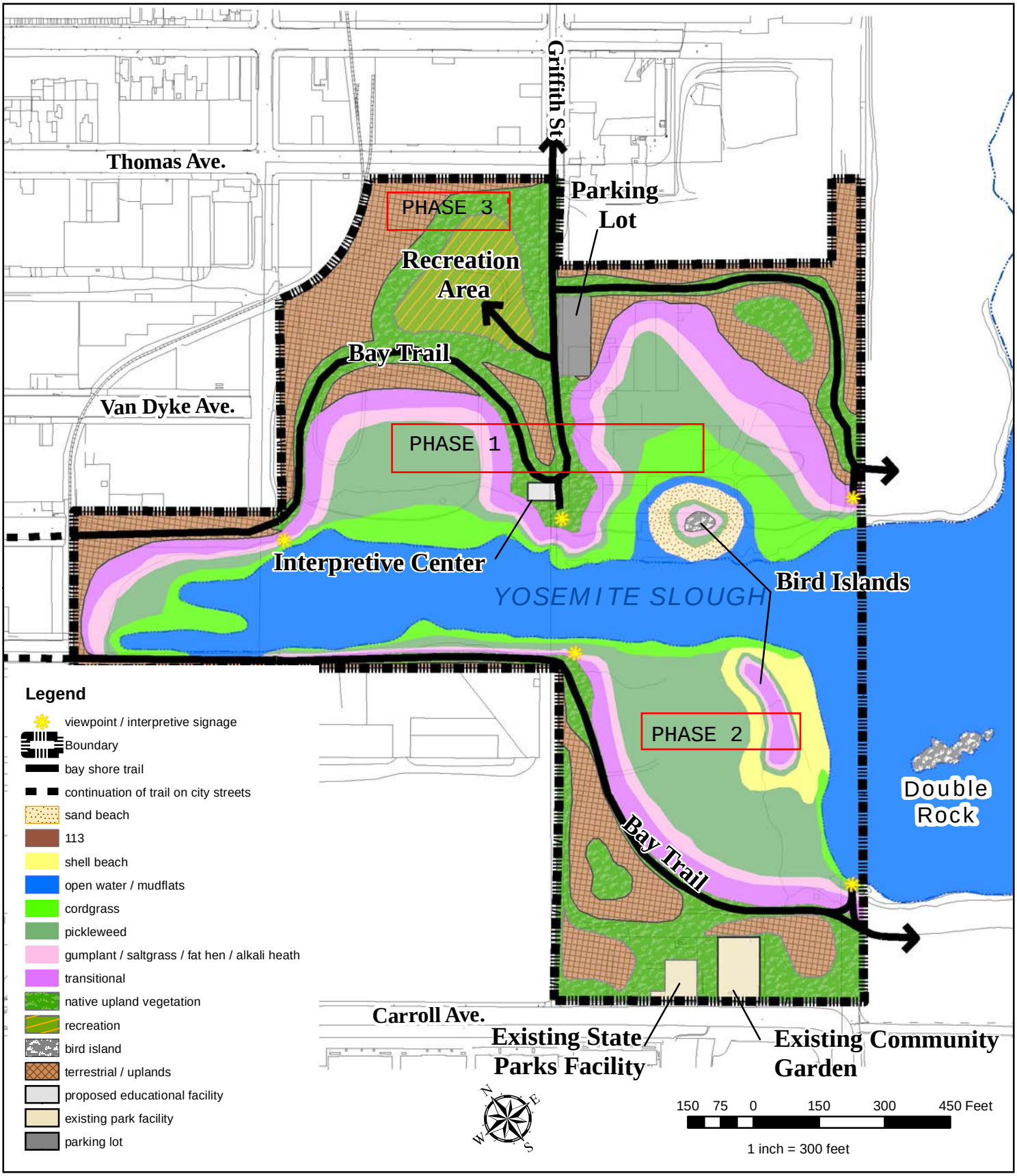
Sedimentation rate based on NCI report "Hydrodynamic Modeling, Wave Analyses, and Sedimentation Evaluation for the Yosemite Canal Wetland Restoration Project, San Francisco, California." Dated September 2005.

Sea Level Rise Estimates from: Knowles, Noah. "Potential Inundation Due to Sea Levels in the San Francisco Bay Region - Final Paper." CEC-500-2009-023-F. August 2009.

NOBLE CONSULTANTS, INC.

California State Parks Foundation's Comments on the Candlestick Point State Recreation Area Preliminary General Plan and Draft Program Environmental Impact Report

EXHIBIT B



Yosemite Slough Wetlands Restoration, CPSRA, San Francisco

Comment Letter 2 – California State Parks Foundation

2-1. State Parks appreciates this comment on the CPSRA Preliminary General Plan and Draft Program EIR.

2-2. The CPSRA Draft Concept Master Plan presented in Appendix C of the CPSRA Preliminary General Plan and Draft Program EIR has been revised to replace the interpretive signage / art symbol north of Yosemite Slough with an interpretive program area / pavilion symbol. The revised Draft Concept Master Plan is shown on the following page.

In addition, the text on page 2-50 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised to indicate that an interpretive area planned on the north side of Yosemite Slough could include either an enclosed structure or an outdoor pavilion, as follows:

> Yosemite Slough
>
> Yosemite Slough, at the northern end of CPSRA, is largely inaccessible due to fencing and surrounding industrial land uses, although visitors may enter the area on foot from the unimproved area to the southeast. Plans are underway for ecological restoration, soil remediation, and recreation via the Yosemite Slough Restoration Project. The project includes the development of new trails, vehicle access points, parking areas, picnic areas, lawn areas, an interpretive area that could include an enclosed structure or an outdoor pavilion, ~~center~~ and educational displays. The area of CPSRA east of Yosemite Slough contained four buildings formerly used as warehouses. These buildings were demolished with the Yosemite Slough Phase I project. Public access is restricted to this area of Yosemite Slough.

The type of interpretive structure that will be constructed on the north side of Yosemite Slough will depend on available funding and will be determined during detailed design and planning for CPSRA. State Parks will work with the California State Parks Foundation during detailed planning for the interpretive program area.

2-3. In response to this comment, the following text has been added to page 3-5 of the CPSRA Preliminary General Plan and Draft Program EIR in Section 3.2.2, Access and Linkages:

> *Access to Yosemite Slough*
>
> As shown in Figure 4-1, Draft General Plan Preferred Alternative, presented on page 4-5 of the CPSRA Preliminary General Plan and Draft Program EIR, the Draft General Plan Preferred Alternative would provide multiple access

points around the perimeter of the park as well as an expanded trail system to improve public access to the park and the Bay shoreline. The Draft Concept Master Plan, which is presented in Appendix C of the CPSRA Preliminary General Plan and Draft Program EIR, identifies approximately 30 access points where visitors can enter the park. Access will also be provided via a walkway located adjacent to the public parking at the administration facility.

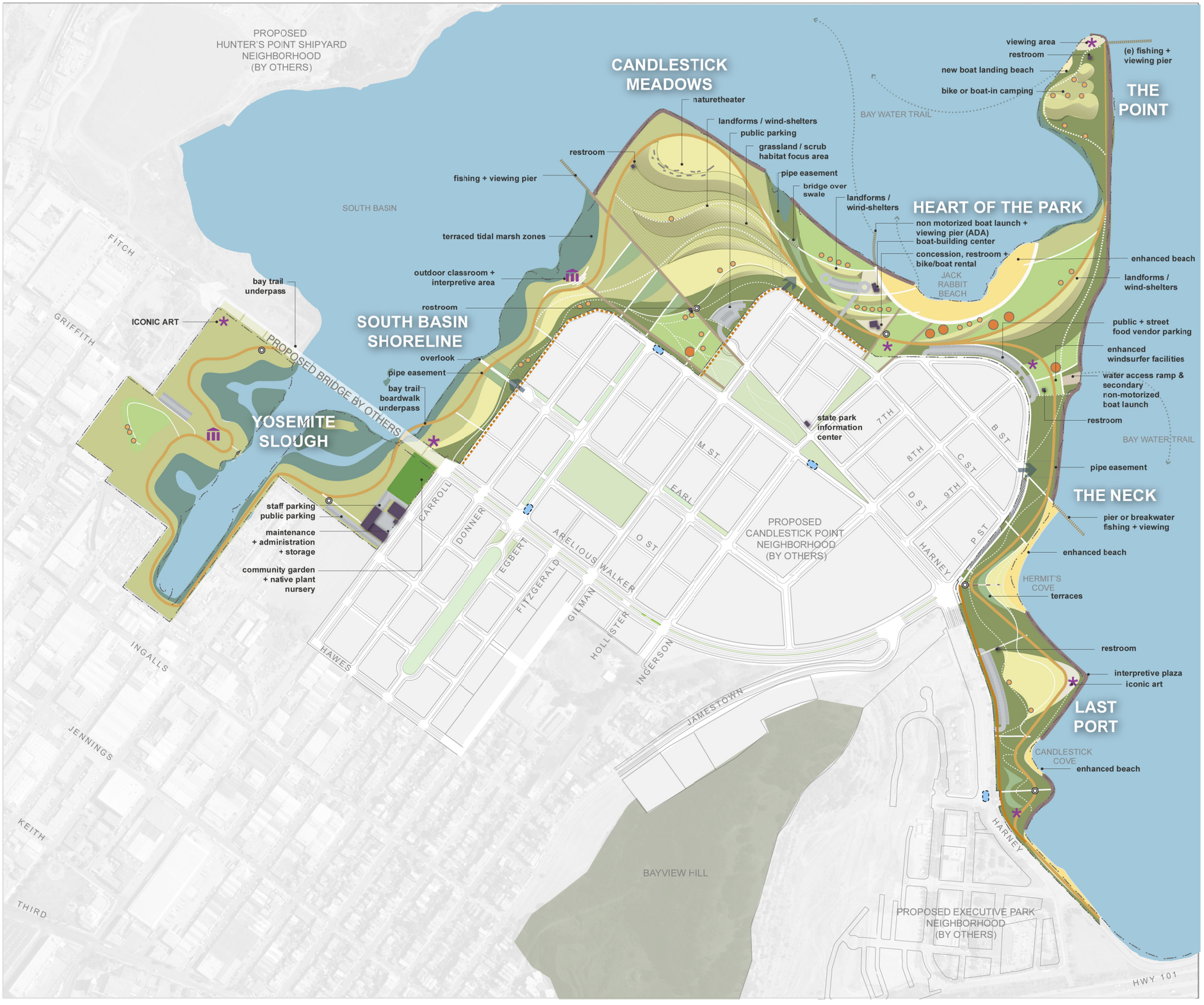
State Parks supports the goals of the Yosemite Slough Restoration Project and will work with the California State Parks Foundation during detailed design and planning to ensure adequate and appropriate access is provided along the south side of Yosemite Slough to residents of the Alice Griffith Housing Project.

2-4. The commenter is correct in noting that CPSRA will have permeable boundaries with multiple access points along the perimeter of the park. As noted in the response to Comment 2-3 of the California State Parks Foundation letter, the Draft Concept Master Plan, which is presented in Appendix C of the CPSRA Preliminary General Plan and Draft Program EIR, identifies approximately 30 access points where visitors can enter the park. Every street that ends at the park will provide an entrance to the park. In addition, the wedge parks that are planned within the adjacent Candlestick Point-Hunters Point Shipyard Phase II Project would extend from planned residential areas to the park and would also provide direct access to CPSRA.

CANDLESTICK POINT STATE RECREATION AREA

Draft

CONCEPT MASTER PLAN



LANDSCAPE TYPES

- tidal marsh zones
- meadow lawn
- grassland / coastal shrub
- coastal native landscape
- active lawn
- community garden / plant nursery
- beach
- paving
- parking
- seasonal raingarden
- landforms
- coastal shoreline treatment

GATHERING AREA

- family
- group

PATH TYPES

- class 1 bike commuter connector
- class 1 (outside SRA)
- bay trail (service access)
- hard trail
- soft trail

FACILITIES

- buildings
- restrooms
- interpretive program area / pavillion
- interpretive signage / art
- info kiosk
- muni bus rapid transit stop
- overland flow point

DRAFT

0 300 600 1,200 Feet

1 inch = 600 feet as 11x17 print

04.10.12

AECOM

In response to this comment, the following text has been added to Section 3.2.2, Access and Linkages, on page 3-5 of the CPSRA Preliminary General Plan and Draft Program EIR:

> ***Access to CPSRA from the Surrounding Neighborhood***
>
> The CPSRA Preliminary General Plan would provide increased public access to the park in anticipation of the approximately 24,000 new residents that will live in the adjacent neighborhood following completion of the Candlestick Point-Hunters Point Shipyard Phase II Project. The CPSRA Draft Concept Master Plan, which is presented in Appendix C of the CPSRA Preliminary General Plan and Draft Program EIR, identifies approximately 30 access points where visitors can enter the park to help integrate CPSRA into the surrounding neighborhood. Every street that ends at the park will provide an entrance to the park. Access will also be provided via a walkway located adjacent to the public parking at the administration facility. In addition, wedge parks are planned within the adjacent Candlestick Point-Hunters Point Shipyard Phase II Project that will extend from planned residential areas to the park and will serve as gateways to CPSRA. The multiple park entrances will create a permeable park boundary that will encourage nearby residents to access CPSRA. The Preliminary General Plan also includes goals and guidelines to improve public access within the park to encourage visitors to access the Bay shoreline, natural areas such as Yosemite Slough, active recreation and group gathering areas, and the Bay Trail, as well as other facilities within the park. Please see Chapter 4, Park Plan.

2-5. Section 2.6.3 of the CPSRA Preliminary General Plan and Draft Program EIR discusses several City of San Francisco documents and policies that are related to public access. Open Space 2100, a collaboration of the Mayor's Office of Greening, City agencies, and the not-for-profit Neighborhood Parks Council, seeks to create a comprehensive open space network in San Francisco (see page 2-80 of the Preliminary General Plan and Draft Program EIR). The Bayview Hunters Point Area Plan, discussed on pages 2-80 through 2-81 of the Preliminary General Plan and Draft Program EIR, includes policies to provide transit and pedestrian access to CPSRA, and to promote compatible land uses. The San Francisco Healthy Development Management Tool, which is discussed on page 2-82 and presented in Appendix B, includes policies and design strategies to improve a proposed plan or project in a manner that will improve community health. The San Francisco Recreation and Park Acquisition Policy is also discussed on page 2-82. The Blue Greenway, an initiative of the San Francisco Mayor's Office, City agencies, and nonprofit groups to create new greenway/waterway along the City's southeast shoreline from China Basin to

CPSRA, is discussed on page 2-83. The 2009 San Francisco Bicycle Plan is discussed on page 2-84.

In response to this comment, the following text has been added to page 2-82 of the CPSRA Preliminary General Plan and Draft Program EIR:

Candlestick Point Design for Development

The *Candlestick Point Design for Development* (San Francisco Redevelopment Agency 2010) identifies CPSRA as a unique opportunity to create a model urban recreation area that links city residents and regional visitors to the diversity of estuary and upland habitats of the Bay. This document also identifies principles for the design process, which include:

- Design city parks and state recreation areas to feel, from a user perspective, as one park system despite potential programmatic and operational differences between jurisdictions.
- Develop a park that is programmed and designed for safe and active 18 – 24 hour daily use by the public.
- Design a pedestrian- and bike-accessible transition zone between all private development parcels and the park.
- Develop frequent routes into the park from the neighborhood, aligning with the planned street network with major linkages with transit stops, bike routes, and linear greenway features.
- Create a mixture of passive and active spaces that activate the open space, drawing neighbors and visitors to the waterfront.
- Provide duplicative trail systems, including linkage to a Class One Bike Trail and multi-use recreation trail close to neighborhoods, a continuous Bay Trail close to the water, and multiple linkages between.
- Install multiple human-powered boat access points, including facilities for windsurfers south of Bayview Hill and kayak/canoe facilities near Jackrabbit Beach.
- Preserve and expand the existing pocket beach.
- Utilize sustainable design principles through park planning to expand the ecological functions of the recreation area and minimize resource consumption by park facilities, programs, and users.

- Introduce limited commercial uses to provide food and recreational services for visitors.
- Balance dedicated parking facilities for the recreation area with available on- and off-street parking provided in the neighboring development, and transit access to the area.
- Upgrade existing and install additional fishing and viewing piers into the bay.
- Provide multiple day use facilities to accommodate family and social gathering in multiple areas of the park, and consider larger scaled gathering opportunities for events.

2-6. State Parks acknowledges that Noble Consultants, Inc. developed an adaptive management plan as part of its letter report dated November 10, 2009, to address sea level rise along the north shore of Yosemite Slough, which was presented at a meeting attended by State Parks staff on January 29, 2010. State Parks assumes that a similar strategy will be developed for the south side of the slough as part of the Yosemite Slough Restoration Project.

In response to this comment, the last paragraph on page 3-15 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as follows:

> The potential for sea level rise presents both opportunities and constraints for CPSRA. New facilities should be sited outside of those areas likely to experience the most substantial coastal flooding in the future. Shoreline treatments, including berms and levees, can also prevent flooding of areas requiring protection, such as those that experience heavy visitor use. However, other areas of the park may undertake softer strategies, such as the creation of tidal marsh to dampen storm surges and flooding. An adaptive management approach that maintains flexibility may be appropriate for some areas, such as Yosemite Slough, where the risk of flooding extends well beyond the CPSRA boundary. As part of the Yosemite Slough Restoration Project, led by the California State Parks Foundation, an adaptive management plan was developed to address sea level rise along the north shore of the slough (see Appendix E). State Parks will continue to work with the California State Parks Foundation to address sea level rise issues within CPSRA. In addition, ~~T~~the planned Candlestick Point-Hunters Point Shipyard Phase II Project intends to elevate the grade of its footprint to withstand sea level rise, and State Parks is coordinating with the City and County of San Francisco and the San Francisco Redevelopment ~~a~~Agency regarding the transition between the development's edge and CPSRA.

2-7. In response to this comment, Section 3.3.1, Yosemite Slough Restoration, presented on page 3-27 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as follows:

3.3.1 Yosemite Slough Restoration

The 1987 CPSRA General Plan called for restoration of Yosemite Slough, a former tidal marsh reduced by filling of San Francisco Bay. ~~The Yosemite Slough Restoration Project is currently underway, and o~~Once restored, Yosemite Slough will be the largest tidal marsh in the City and County of San Francisco. The restoration of Yosemite Slough includes restoring 12 acres of upland fill back to tidally influenced wetlands. The restoration design includes the creation of bird nesting habitat, nursery areas for fish and benthic organisms, buffer areas to sensitive habitats, new interpretive trails, and additional recreation and education amenities. The restoration project will also address soil contaminant issues arising from previous fill activities that could affect human and wildlife health (RMC and Jones & Stokes 2006). Restoration and remediation north of the slough was completed in 2011, and detailed design of Phase II (south of the slough) is scheduled for 2012.~~The restoration project consists of two phases. Phase 1 aims to restore tidal marsh vegetation to the area of CPSRA north of the slough. Restoration of this area will include remediation of 41,000 cubic yards of contaminated soil and planting of native tidal marsh vegetation. Construction of Phase 1 began in 2011. Phase 2 will include construction of interpretive trails, an extension of the Bay Trail, new parking, picnic areas, and a restroom in the Phase 1 area, as well as revegetation and an interpretive facility in the area south of the slough. The restoration project will include extensive grading to create wetland habitat. Phase 2 is currently in the conceptual phase, with plans to move forward with more detailed designs as funding becomes available (Archambault, pers. comm., 2010).~~ The CPSRA General Plan ~~incorporates~~ recognizes the Foundation's plans ~~the planning underway~~ for Yosemite Slough to promote continued restoration of the area.

2-8. In response to this comment, Section 3.3.2, Yosemite Slough Bridge, presented on page 3-27 of the CPSRA Preliminary General Plan and Draft Program EIR, has been revised as follows:

3.3.2 Yosemite Slough Bridge

The planned Candlestick Point-Hunters Point Shipyard Phase II Project includes a ~~vehicle~~ bridge that would extend over Yosemite Slough, connecting Arelious Walker Drive to Fitch Street. The ~~proposed~~ bridge would be restricted to city buses, ~~with private vehicular traffic allowed only during~~

~~San Francisco 49ers home games – approximately 10 days from late summer to mid-winter. B~~ bicycles, and pedestrians. ~~would be allowed on the bridge on non-game days.~~ The ~~proposed~~ bridge ~~poses compatibility issues~~ could potentially cause inconsistencies with the planned Yosemite Slough Restoration Project, which will expand public access and wildlife habitat, including islands for nesting birds. Two agreements that reference the bridge would minimize that potential. ~~The California State Parks Foundation, the organization planning and funding the restoration project for California State Parks, and Lennar Urban have agreed to collaborate on~~ The Settlement Agreement and General Release (dated January 7, 2011) between the Sierra Club, Golden Gate Audubon Society, and CP Development Company (the developer of the Candlestick Point project, including the bridge), requires the developer to consider and implement various ~~the~~ design and construction strategies of ~~the bridge~~ to reduce impacts. Similarly, the Candlestick Point State Recreation Area Reconfiguration, Improvement, and Transfer Agreement (dated April 6, 2011) between State Parks and the City and County of San Francisco, commits the City—acting as successor to the San Francisco Redevelopment Agency—to include the California State Parks Foundation and State Parks in the approval process for the bridge and to cooperate in ensuring that the bridge is consistent with the wetland, aquatic habitat, public access, and recreation objectives of the restoration project. ~~ensure that it minimizes impacts to the planned restoration and public access features and that it resolves the compatibility issue (CSPF 2010).~~

2-9. A separate environmental review process was conducted for the Yosemite Slough Restoration Project and a Mitigated Negative Declaration was adopted for the project in 2006. Phase 1 of the northern side of the project has been completed, and the southern side is scheduled for 2012. As stated in the response to Comment 2-3 of the California State Parks Foundation letter, State Parks will continue to work with the California State Parks Foundation during future planning, detailed design and implementation of the General Plan.

Please see the response to Comment 2-6 of the California State Parks Foundation letter for a discussion of sea level rise, and the responses to Comments 2-3, 2-4, and 2-5 of the California State Parks Foundation letter for discussion of access.

2-10. This comment is noted. The Natural Preserve classification under PRC Section 5019.71 would not restrict public access to the wetlands. Please see the response to Comment 2-3 of the California State Parks Foundation letter above regarding public access to Yosemite Slough.

2-11. This comment is noted.

2-12. Please see the response to Comment 2-3 of the California State Parks Foundation letter above. State Parks will continue to work with the California State Parks Foundation during future planning, detailed design and implementation of the General Plan to ensure adequate and appropriate access is provided on both sides of Yosemite Slough.

2-13. Please see the response to Comment 2-2 of the California State Parks Foundation letter above. In response to this comment, Section 4.4.1, presented on page 4-7 of the CPSRA Preliminary General Plan and Draft Program EIR, has been revised to indicate that an interpretive area planned to the north of Yosemite Slough could include either an enclosed structure or an outdoor pavilion, as follows:

4.4.1 Yosemite Slough

This area consists of the portion of CPSRA surrounding Yosemite Slough, including the Community Garden/Plant Nursery and Administration/Maintenance zones. The Yosemite Slough Restoration Project stems from CPSRA's first General Plan~~ and has already been permitted~~. Construction of Phase I (north of the slough), began in 2011, and detailed design of Phase II (south of the slough) will occur in the future. Uses are primarily oriented around the creation of tidal marsh and upland habitats, low-impact recreation, (e.g., wildlife viewing, picnicking), and educational and interpretive activities related to the restoration project. Facilities in the Yosemite Slough area will include the existing Community Garden and native plant nursery, maintenance/administration facilities, and adjacent staff parking area; new facilities may include an information kiosk, iconic art, <u>an interpretive area in an upland area on the north side of Yosemite Slough that could include an enclosed structure or an outdoor pavilion</u>~~interpretive program area/pavilion~~, family gathering areas, public parking areas, and extension of the Bay Trail. Design of this area would include a key pedestrian access point to link Yosemite Slough with the nearby Alice Griffith housing development.

2-14. Please see the response to Comment 2-6 of the California State Parks Foundation letter above. In response to this comment, Section 4.5.2, Sea Level Rise, presented on page 4-13 of the CPSRA Preliminary General Plan and Draft Program EIR, has been revised as follows:

4.5.2 Sea Level Rise

As a bayside park, CPSRA must consider the future effects of sea level rise. Where considered necessary to preserve park facilities, natural resources, and opportunities for visitor use, engineered solutions to sea level may be appropriate. This may include adding fill to increase the elevation of the park

in certain locations, the construction of barriers (e.g., berms, levees), and/or grading at the shoreline edge. In other locations, the response may be to retreat and allow rising seas to overflow the shoreline or other low-lying portions of the SRA. This would change the landscape of the park and may in turn result in additional improvements. For example, sea level rise that inundates the area between the Heart of the Park from The Point may create an island and lead to subsequent construction of a bridge to continue visitor access. Addressing sea level rise at CPSRA may involve adaptive management, whereby State Parks determines an appropriate response, monitors its performance, and determines the need for any modifications or other next steps. Additional technical studies would be needed to understand how sea level rise will affect different areas of the park's shoreline. An adaptive management plan to address sea level rise was developed for the north side of Yosemite Slough as part of the Yosemite Slough Restoration Project, and it is expected that a similar adaptive management strategy will be developed for the south side of the slough (see Appendix E). State Parks will continue to work with the California State Parks Foundation during detailed design and planning to address sea level rise within CPSRA.

2-15. State Parks appreciates this comment.

2-16. In response to this comment, the following new Guideline Visitor Facilities-17 has been added to page 4-18 of the CPSRA Preliminary General Plan and Draft Program EIR:

Guideline Visitor Facilities-17: Provide an interpretive program area / pavilion on the upland north side of Yosemite Slough to facilitate education about the Yosemite Slough Restoration Project.

In response to this comment, Guideline Interpretation-21, presented on page 4-45 of the CPSRA Preliminary General Plan and Draft Program EIR, has been revised as follows:

Guideline Interpretation-21: Develop ~~outdoor~~ interpretive facilities that can serve as multi-use areas, such as an outdoor classroom along the South Basin shoreline, an interpretive area that could include an enclosed structure or an outdoor pavilion along the north side of Yosemite Slough, and~~-~~a nature theater in a location offering sweeping views of the Bay.

Please see the response to Comment 2-2 of the California State Parks Foundation letter. The Draft Concept Master Plan presented in Appendix C of the CPSRA Preliminary General Plan and Draft Program EIR has been revised to include an interpretive program area / pavilion on the upland north side of Yosemite Slough.

2-17. Please see the responses to Comments 2-3 and 2-4 of the California State Parks Foundation letter. The objective of Goal Trails/Routes-1, presented on page 4-20 CPSRA Preliminary General Plan and Draft Program EIR, is to "provide a trail/route system that offers diverse experiences to visitors with access to the Bay shoreline and regional trail systems." Guideline Trails-1 and Guideline Trails-2 similarly address access within the park. As stated in the response to Comment 2-3 of the California State Parks Foundation letter, State Parks will consult with the California State Parks Foundation during detailed design and planning to ensure adequate and appropriate public access is provided to Yosemite Slough.

2-18. In response to this comment, the following text has been added to the Shoreline Management and Water Quality discussion on page 4-25 of the CPSRA Preliminary General Plan and Draft Program EIR:

Shoreline Management and Water Quality

CPSRA's location on San Francisco Bay is one of its greatest assets, providing wildlife habitat and opportunities for visitor enjoyment. However, the park's bayside setting also brings challenges related to shoreline erosion, coastal flooding, water quality, and sea level rise. The park can do its part to minimize the risks to park staff, visitors, and facilities, but park managers should also plan to adapt to changing conditions in the natural environment.

<u>An adaptive management plan to address sea level rise was developed for the north side of Yosemite Slough as part of the Yosemite Slough Restoration Project, and it is expected that a similar adaptive management strategy will be developed for the south side of the slough. State Parks will continue to work with the California State Parks Foundation during detailed design and planning to address sea level rise within CPSRA.</u>

2-19. In response to this comment, the second paragraph in Section 4.6.4, Community and Cultural Resources, on page 4-30 of the CPSRA Preliminary General Plan and Draft Program EIR, has been revised as follows:

Community Programs and Facilities

CPSRA is an important open space resource for the surrounding community, currently providing areas for recreation, community gatherings, and special events. The park experiences high levels of visitor use from residents in the Bayview Hunters Point neighborhood. The adjacent planned redevelopment, coupled with current recreation trends, will likely increase CPSRA's popularity as a destination for local community members and regional visitors. <u>The provision of adequate and appropriate public access to encourage visitors to easily enter and use all areas of the park will help to integrate CPSRA into the</u>

neighborhood and maximize the community's involvement in community programs and facilities.

2-20. Please see the response to Comment 2-16 of the California State Parks Foundation letter. Guideline Interpretation-21 has been revised to include the interpretive program area / pavilion on the upland north side of Yosemite Slough.

2-21. Please see the response to Comment 2-2 of the California State Parks Foundation letter. As per the proposed Concept Master Plan, the interpretive program area on the upland north side of Yosemite Slough could include an enclosed structure or an outdoor pavilion. The type of structure and the need for staffing at this interpretive structure will depend on available funding and will be determined during detailed design and planning for CPSRA. State Parks will work with the California State Parks Foundation during detailed planning for the interpretive program area.

In response to this comment, the following text has been added to the Agreements and Concessions discussion on page 4-55 of the CPSRA Preliminary General Plan and Draft Program EIR:

Agreements and Concessions

CPSRA has entered into a number of agreements regarding the future development, operation and maintenance of the park, pertaining to the adjacent Candlestick Point-Hunters Point Shipyard Phase II Project. These agreements provide a unique opportunity for the park to implement this General Plan, and they will require continued collaboration with the City and County of San Francisco.

State Parks has a partnership agreement with the California State Parks Foundation to complete the final design, construction estimates and permitting phase of the Yosemite Slough Restoration Project. This project has received $14.3 million from multiple funding sources, including the Wildlife Conservation Board/State Coastal Conservancy, Association of Bay Area Governments, Bay Conservation Development Commission, the City and County of San Francisco, Bay Area Rapid Transit (BART), the Richard and Rhoda Goldman Foundation, U.S. EPA Region 9 - San Francisco Bay Water Quality Improvement Fund/San Francisco Estuary Partnership, the S.D. Bechtel, Jr. Foundation, the San Francisco Foundation, the Barkley Fund, and the California Department of Parks and Recreation. The restoration project provides mitigation credits for two of the funding sources, the City and County of San Francisco and BART.

The California State Parks Foundation has entered into an agreement with Lennar Urban that governs both the design and the process related to permitting the proposed bridge across the mouth of Yosemite Slough.

2-22. In response to this comment, Guideline Tidal Marsh-6, presented on page 4-58 of the CPSRA Preliminary General Plan and Draft Program EIR, has been revised as follows:

> **Guideline Tidal Marsh-6:** Adopt an adaptive management approach for the creation and enhancement of the Tidal Marsh Zone, given the uncertainties surrounding the restoration of wetlands on artificial fill. Coordinate with the Yosemite Slough Restoration Project during development of this adaptive management approach.

State Parks does not agree with the commenter that Goal Active Recreation Zone-1, presented on page 4-60 of the CPSRA Preliminary General Plan and Draft Program EIR, needs to be revised to reference either the interpretive program area or the Yosemite Slough Restoration Project because this use is consistent with the goals of this management zone.

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February 21, 2012

Via US Mail and Email
Ms. Marie Galvin, Project Manager AECOM
150 Chestnut Street
San Francisco, CA 94111
E-mail: marie.galvin@aecom.com

RE: Candlestick Point State Recreation Area Draft General Plan and Environmental Impact Report

Dear Ms. Galvin:

This letter is submitted on behalf of the Golden Gate Audubon Society ("GGAS") regarding the Candlestick Point State Recreation Area ("CPSRA") Draft General Plan and Environmental Impact Report ("DEIR"). GGAS members and staff have participated in the General Planning process and use and enjoy the CPSRA. We appreciate this opportunity to comment on the DEIR and hope our input will improve the final outcome.

As we have participated in this process and prepared our comments, GGAS has been guided in large part by the stated mission of the CPSRA

> *[t]o make available to the people the recreational opportunities, whether passive or active, that are offered by the existence of the shoreline and adjacent bay waters*.

(DEIR, at S-2) We are also guided by the fact that the CPSRA is an important community resource, for the residents of the Bayview and the broader Bay Area. Birders know the spot well. Indeed, wildlife viewing and birding is conspicuously absent from the DEIR's list of current uses at the site. (*See* § 1.2.2 *Existing Features and Land Uses Within the Park*) Many Bay Area residents regularly visit the park to view birds and other wildlife and report their findings to other enthusiasts through internet groups, websites and newsletters. 3-1

We hope that through this process the California Department of Parks and Recreation will remember that the CPSRA will be more than a "green front lawn" to the new residents expected to move in with redevelopment. The CPSRA is critical habitat for

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birds and other wildlife and an important place for existing residents and visitors to the area to connect with nature along San Francisco Bay. Birds use this as a stopping point along the Pacific Flyway during the spring and fall migration and each year flocks of shorebirds and water birds make CPSRA their winter home. While the very low bar set by CEQA only requires impacts to sensitive or lists species to be considered "significant", we urge the Department to consider the importance of maintaining biodiversity and keeping "common" birds "common" and off of sensitive-species lists. 3-1

I. GGAS ENDORSES ALTERNATIVE 3 (NATURE IN THE CITY).

As an initial matter, GGAS must disagree with the DEIR's assessment and evaluation of the Alternatives, particularly to the extent that Alternative 3 (Nature in the City) should be the "Preferred Alternative." As written, Alternative 3 would provide substantial recreational opportunities for visitors while keeping to the park's purpose of prioritizing values associated with the shoreline and the open waters of the Bay. A significant part of the "shoreline" and "waters of the bay" is the quality of those habitats, the presence of native plants and wildlife, and the peace and quiet they provide for human visitors. The Proposed Plan completely subscribes to more active recreation at the site, including an amphitheater. GGAS believes that the evaluation should be reassessed and that Alternative 3 should be selected as the Preferred Alternative. 3-2

We are particularly concerned about the proposed plan because it clearly anticipates implementing measures, such as night-lighting along the Bay Trail and throughout the park, that is mostly unnecessary and likely to cause impacts on birds and other wildlife in the area. We discuss several of these concerns further below. We believe that Alternative 3 provides an excellent balance of active and passive recreation while still respecting and accommodating the birds that contribute to the park's special character.

II. THE DEIR SHOULD IMPROVE ITS DISCUSSION OF IMPACTS AND MITIGATION MEASURES.

As an initial matter, we note that each of the mitigation measures is described as a "guideline" rather than a requirement or concrete action. A "guideline" implies voluntary action with a lot of leeway. GGAS does not understand how it, or any public reviewer or decision-maker, can determine whether impacts will be mitigated to "less than significant" levels by vague, noncommittal "guidelines. GGAS asks for a clarification in the FEIR or, preferably, a clear commitment to set mitigation measures. 3-3

A. The Project Has the Potential to Divide the Current Community.

While the projects on State Park land as anticipated by the DEIR do not, on their face, divide the existing community, the DEIR fails to address the demographic and community changes that will occur due to the redevelopment at Hunters Point and especially at Candlestick Point. (*See* LU-1. *Potential for the Project to Physically Divide* 3-4

an Established Community) With the departure of the 49ers, it is very likely that the stadium will be replaced with a mix of commercial buildings and residences that will be significant more expensive than can be afforded by current area residents. It seems like the redevelopment will create a gentrified barrier that separates the existing community from the CPSRA. We believe that the DEIR should at least consider this issue in greater depth and proposed mitigation measures to ensure that the CPSRA remains physically and psychologically accessible to current community residents. 3-4

B. The DEIR Should Improve Its Discussion of Storm Water Impacts from the Project, Including the Development of Lands Transferred Pursuant to SB 792.

In general, GGAS endorses the approach to mitigation impacts described in WATER-4 (*Impacts on San Francisco Bay Caused by Stormwater Runoff from Operation of the Project Site*) Using natural and semi-natural storm water controls, such as bioswales and wetlands, can significantly reduce pollutants discharged to the Bay while also providing habitat for wildlife. 3-5

One concern is whether the DEIR anticipates storm water to be received from adjacent lands. Redevelopment at Candlestick Point will result in significant increases in the number of residents and vehicles in the area and a likewise increase in pollutants in storm water. If the park is going to receive increased levels of storm water and/or pollutants in storm water, will the proposed measures be adequate?

Second, will the storm water mitigation measures such as the bioswales and wetlands, be maintained? Suspended solids in storm water can fill in swales and wetlands over time. The DEIR would be improved with a description of how the best management practices will be maintained over time. 3-6

GGAS would also like the DEIR to discuss specific storm water controls that can be implemented at the sewer outfalls within the CPSRA. For example, can trash capture devices be installed to prevent trash from entering the San Francisco Bay and out to the Pacific Ocean?[1]

[1] *See* Mercury News "San Francisco Bay a garbage can for 7 million people" http://www.mercurynews.com/green-living/ci_19972044 and http://www.sfestuary.org/projects/detail.php?projectID=42

C. The DEIR Should Improve Its Discussion of Impacts to Wildlife and Fish.

1. The DEIR does not adequately discuss the impacts of lighting on wildlife and fish.

While the effects of lighting and glare are discussed in the Aesthetics section, the DEIR does not address the biological impacts of lighting. The DEIR should discuss these impacts and how they may be mitigated. We note that several of the mitigation measures identified in the Aesthetics section may apply to reducing biological impacts.

Visitor Safety Guideline Visitor Safety-12 recommends: "Install nighttime lighting and signage, and deploy night patrols as needed to provide oversight during extended hours. Consider operational options such as closing the park from 10:00 p.m. to 5:00 a.m." GGAS recommends that the park be closed from 10:00 pm until 5:00 am each day. The closure will improve visitor safety and provide wildlife with a lower degree of disturbance during those hours. GGAS recommends that the park be open only during daylight hours, rather than a set time of 5:00 am to 10:00pm. 3-7

Guideline Multi-Modal-9 states" **"**Provide nighttime lighting along the CPSRA perimeter and the San Francisco Bay Trail to improve visitor and commuter safety." Lighting along the Bay Trail at the CPSRA will impact roosting shorebirds and water birds from the Last Port to Sunrise Point and in Jackrabbit Cove. Again, GGAS encourages the Department to ensure that lighting is minimized where possible without demonstrably reducing visitor safety. The Department would improve visitor safety, save energy (and reduce greenhouse gas emissions associated with energy use), and reduce disturbance to wildlife by keeping the park open only during daytime hours.

Given the recent (2011) confirmation of breeding California Clapper Rail at Heron's Head Park and their persistence there into the 2012 breeding season, the DEIR should improve its discussion regarding the impacts of the project on clapper rails. It is likely that once Yosemite Slough restoration is complete, the site could host breeding clapper rails, San Francisco common yellowthroat, and other salt-marsh dependent birds. 3-8

2. Dog-Walking should be regulated and leash-requirements should be enforced.

Guideline Recreation-4 (*Allow dog walking within the park provided that dogs are kept on leash. Dogs are not allowed in the beach shoreline zone*) is a good starting point for reducing impacts of dogs on wildlife, other park users, and each other. To ensure the safety of and peaceful foraging and roosting for wildlife, dogs must be prohibited from accessing the beach. Moreover, it is absolutely necessary that leash and prohibition requirements be enforced. A lack of enforcement will render this Guideline completely meaningless. 3-9

Moreover, GGAS advocates that there be a limit of three dogs walked on leash per human. In other areas of the City dog walkers are allowed to walk more dogs, but they often lack control and neglect to pick up after the dogs. Uncontrolled dogs can result in injuries to people, wildlife and other dogs and left droppings can be unhealthy and deter use and enjoyment of the park by other visitors.

A failure to implement clear rules and enforce them by the Department could result in the kind of expensive and controversial rulemaking that has been forced up on the Golden Gate National Recreation Area, requiring more than a decade of meetings, attempting rulemaking, and litigation. We urge the Department to establish clear rules now, to educate visitors who bring dogs, and to enforce rules consistently and fairly as soon as the Plan is approved. 3-9

D. The DEIR's Discussion of Demographics and Recreation Trends Should Be Improved.

The Recreation Trends section (§2.7) should consider local needs assessments in addition to state-wide trends. While the recreation trends presented in Section 2.7 are informative, they paint with a very broad brush. CPSRA feels like a very local park to most of its users. Moreover, locals will be the primary users of the park in the future. As such, the DEIR should consider recreation trends in San Francisco. GGAS recommends that the DEIR authors review San Francisco's 2004 Recreation Assessment Report and incorporate its findings into the DEIR.[2] For example, the report found that surveyed San Franciscans ranked hiking, walking and biking trails as their top priority for recreational facilities and included 61% of respondents stated that they visited nature areas. (SF Needs Assessment (2004), at 13-14). These findings may contribute to consideration of Alternative 3 as the Preferred Alternative. 3-10

E. Discussion of the Impacts Arising from the Changing of the CPSRA Boundary Should Be Improved.

The DEIR discusses the changes to the CPSRA boundary enacted as part of SB 792 in several places and purports to describe them on page 3-3 of the DEIR. The discussion appears slanted to describe the purported benefits of the reconfiguration. For example, in addition to removing the current main entrance, the reconfiguration will significantly reduce the widest part of the heart of the park. It will bring dense housing and retail close to the shoreline. This is likely to further disrupt wildlife at the site and alter the experience of park users. The DEIR would be more informative to the public and decision makers and the public if it better described the specific changes and their impacts, for better or worse. 3-11

[2] The 2004 Needs Assessment is available at http://sf-recpark.org/ftp/uploadedfiles/wcm_recpark/Notice/SFRP_Summary_Report.pdf

The DEIR would be further improved if it provided a more determinate timeline for when the CPSRA will benefit from the funds promised by SB 792. The legislation was extremely unusual and carved out a large portion of the state park for the benefit of a local redevelopment agency and its private corporate partner. Current planning for the CPSRA hinges, in large part, on the redevelopment and the promised funds. It is difficult to truly assess the impacts of the project or the overall benefits without confidence of how or when the configuration will take place. 3-11

F. The DEIR Should Be Amended to Account for the Departure of the 49ers.

Since the DEIR was released, the 49ers have confirmed that they will be leaving San Francisco.[3] The DEIR refers to the stadium and the 49ers' games in several areas. Where appropriate, the DEIR should be revised to account for the team's departure. 3-12

For example, the DEIR's discussion of the proposed bridge over Yosemite Slough specifically states that the use of the bridge is to accommodate traffic only during 49er home games. To the extent that the traffic usage is any different, the DEIR should be revised. At a minimum, bridge use by pedestrians and bicycles should be enforced to ensure the safety of visitors and the nesting birds and other wildlife that will depend upon the restored area and nearby islands at Yosemite Slough.

G. All Facilities Should Be LEED-equivalent and Be Designed to Be "Bird-Safe"

New and improved facilities at the CPSRA will be welcome additions for most visitors to the park and will be necessary to accommodate the likely increase in users. GGAS requests that the Department ensure that any new facility is energy efficient and wildlife-friendly, particularly "bird safe." GGAS recommends that the DEIR's authors consider and incorporate recommendations from San Francisco's *Standards for Bird Safe Buildings* (2011).[4] For example, facilities should not include large, plate glass windows, especially those that are not treated with fritting or films to make them more visible to birds. Transparent windbreaks should be prohibited. Finally, unnecessary lighting should be avoided where ever possible. 3-13

[3] *See* Huffington Post "49ers Moving to Santa Clara: City Council Approves Contract for New Stadium" http://www.huffingtonpost.com/2012/02/15/49ers-moving-to-santa-clara-stadium_n_1280504.html
[4] The Standards are available at http://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards_for_Bird-Safe_Buildings_8-11-11.pdf

H. The DEIR Should Ensure Adequate Management of Trash, Recycling and Compost to Avoid Impacts on Wildlife.

Poorly managed trash and other waste materials at the CPSRA will result in impacts to wildlife and aesthetic resources. Some species, such as crows, ravens, rats and raccoons, thrive on poor trash management. These species can have significant negative impacts on other species, especially birds. Mitigation measures for Impact UTIL-1 (*Increase Demand on Utilities and Service Systems*) should include a waste management plan that ensures that trash, recycling, and compost receptacles will be wildlife-proof and regularly emptied. There should also be a fishing line recycling program and disposal unit at the park to avoid waste associated with fishing line.[5] 3-14

I. The Interpretative Opportunities Should Continue to Be Developed.

Overall, GGAS is supportive of the opportunities for interpretation discussed in the DEIR/General Plan. However, we believe that there are several areas in which they could be improved. In addition to briefly addressing them here, we hope that the Department will continue to work with the community and partners such as GGAS in developing interpretative materials for the CPSRA. 3-15

1. Interpretative material for a Monofilament Recycling Program should be included.

Fishing line is a dangerous pollutant for many species of wildlife. Monofilament recycling programs can educate fishermen and provide opportunities to reduce monofilament waste in the environment. The General Plan should include a requirement that a monofilament recycling program and interpretative materials will be implemented at CPSRA. 3-16

2. Tangible-based interpretations

In addition to those listed in the DEIR, GGAS recommends that the Department consider that wetlands benefit wildlife, including birds and aquatic species, and also benefit humans due to carbon capture, oxygen production, and storm water filtration. The value of wetlands should be included in interpretative signage and other materials. 3-17

3. Interpretation for terrestrial wildlife.

The DEIR identifies several terrestrial wildlife species that use or benefit from the park, including raptors. It would be unfortunate if the Department missed an opportunity to talk about such compelling animals or the value of habitat linkages (such as that to Bayview Hill) because it dismissed terrestrial wildlife due to an apparent lack of habitat. 3-18

[5] For more information on fishing line recycling, please see http://mrrp.myfwc.com/.

(*See* DEIR at 3-25) GGAS urges the Department to reconsider this portion of the DEIR and include interpretation about terrestrial habitat and wildlife. 3-18

4. Interpretation for non-motorized marine recreation

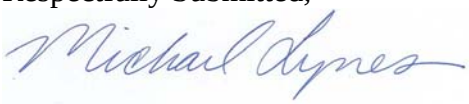
GGAS understands and appreciates the CPSRA's value for non-motorize marine recreation. We also believe that interpretation related to those activities should include some information on common marine birds and marine mammals that share the site with recreational users.[6,7] 3-19

III. CONCLUSION

Overall, the draft General Plan promises several key improvements at the CPSRA. We urge the Department to take an active interest in improving the park for the local community and wildlife, and to balance the demands of recreational users with the needs of wildlife that have already lost much of their habitats through the Bay. 3-20

Thank you for your consideration of our comments. If you would like further information or to discuss any of our comments further, please do not hesitate to contact me at (510) 843-6551 or mlynes@goldengateaudubon.org.

Respectfully Submitted,



Michael Lynes
Conservation Director

[6] *See* http://www.fws.gov/laws/lawsdigest/marmam.html
[7] See PRBO Birds at the Beach http://www.prbo.org/cms/184

Comment Letter 3 – Golden Gate Audubon Society

3-1. In response to this comment, Section 1.2.2, Existing Features and Land Uses within the Park, presented on page 1-5 of the CPSRA Preliminary General Plan and Draft Program EIR, has been revised as follows:

1.2.2 Existing Features and Land Uses within the Park

The shoreline of CPSRA is perhaps its most defining feature, particularly considering the park's urban surroundings. Long-range scenic views of San Francisco Bay are available from viewpoints throughout the park. Passive recreation is the focus of the park, and development is concentrated in areas that provide the greatest shoreline access, primarily south of the main park entrance. Activities include windsurfing, fishing, beach use, picnicking, walking, wildlife viewing, birding, and a variety of uses on the existing three miles of nonmotorized trails (State Parks 2009a). The San Francisco Bay Trail, a regional trail that will circle the Bay when completed, follows the CPSRA shoreline from the San Mateo County line to Sunrise Point (The Point), and then continues through the Main Park (Heart of the Park) to Donohue Avenue. Figure 1-3 illustrates the existing conditions within CPSRA.

State Parks agrees with the commenter's statement that CPSRA provides critical habitat for birds and other wildlife, and that it is an important place for existing residents and visitors to connect with nature along San Francisco Bay. As stated on page 4-24 of the CPSRA Preliminary General Plan and Draft Program EIR, "CPSRA is an important resource for both common and special-status wildlife species, given the limited availability of natural habitat in the surrounding region. San Francisco Bay provides an open migratory corridor for birds to move back and forth across the Bay to more secluded, better-suited nesting and loafing sites. Balancing the protection and enhancement of wildlife habitat with park improvements and the changes planned for the surrounding neighborhood should be an important focus of natural resource management at CPSRA." Please see the Wildlife goals and guidelines presented in Section 4.6.3, Natural Resources, of the CPSRA Preliminary General Plan and Draft Program EIR (pages 4-24 through 4-25).

3-2. As stated on page 4-1 of the CPSRA Preliminary General Plan and Draft Program EIR, "the primary purpose of the Candlestick Point State Recreation Area is to make available to the people the recreational opportunities, whether passive or active, that are offered by the shoreline and adjacent bay waters." The Preliminary General Plan Preferred Alternative, described in Chapter 4, Park Plan, was selected by State Parks, with input through multiple public workshops and stakeholder meetings, to best meet the primary purpose of this state

recreation area. The Preferred Alternative meets the goal of a State Recreation Area by providing active recreation opportunities while also providing enhanced natural resource areas.

As stated on page 5-70 of the CPSRA Preliminary General Plan and Draft Program EIR, the focus on nature-based recreation and natural resource protection under Alternative 3 would result in fewer facilities and programs for active recreation. Facilities proposed in the Preferred Alternative that are excluded from Alternative 3 include the pier along the South Basin shoreline, nature theater in Candlestick Meadows, bike/boat-in camping at The Point, enhanced windsurf facilities at The Neck, and the information center in the neighboring community. In addition, Alternative 3 does not include raingardens for stormwater management or address the threat of sea level rise, as the Preferred Alternative does.

As stated on page 4-3 of the CPSRA Preliminary General Plan and Draft Program EIR, “once the Yosemite Slough Restoration Project is completed, State Parks should consider classifying the restored habitat as a natural preserve.” This would ensure protection for the sensitive habitat that will be restored along Yosemite Slough.

3-3. To clarify that the guidelines identified in Chapter 5, Environmental Analysis of the CPSRA Preliminary General Plan and Draft Program EIR, are programmatic mitigation measures that would reduce impacts to less than significant levels; each guideline has not been repeated in Chapter 5, because the guidelines which are referenced are found in their entirety in Chapter 4. Furthermore, the use of goals and guidelines as mitigation measures was noted on page 1-11 of the CPSRA Preliminary General Plan and Draft Program EIR. At a programmatic level, the use of guidelines is an acceptable means to mitigate impacts, and it is described in Section 1.7 of the CPSRA Preliminary General Plan and Draft Program EIR that future planning would include the preparation of project-specific environmental compliance documents for the implementation of management plans and subsequent development projects in CPSRA.

3-4. Please see the response to Comment 2-4 of the California State Parks Foundation letter. The CPSRA Preliminary General Plan will provide a permeable park boundary with many access points and will serve as a gathering area for community residents. The effects of the Candlestick Point-Hunters Point Shipyard Phase II Project on the community were addressed in the EIR that was prepared for that project.

3-5. State Parks appreciates this comment.

3-6. Most of the stormwater discharge (discharge up to the 100-year storm event) from the adjacent planned Point-Hunters Point Shipyard Phase II Project will be directed underneath CPSRA through a subsurface system and discharged into the Bay under a discharge permit. During a 100-year storm event, when the subsurface system is at maximum capacity, stormwater would flow down roadways onto parkland.

Stormwater mitigation measures, including wetlands, bioswales, and raingardens, will be maintained as part of park operations. Detailed information on methods for maintaining these features will be addressed in the management approach for the park.

While some City-operated sewer outfalls are located in and around CPSRA, the park has its own stormwater system that is separate from the City's combined sewer system. It is up to the City to determine whether to install trash capture devices on its sewer outfalls. The CPSRA Preliminary General Plan and Draft Program EIR includes goals and guidelines that encourage the use of stormwater controls such as raingardens and bioswales. Please see the Water Quality goals and guidelines that are presented on page 4-27 of the CPSRA Preliminary General Plan and Draft Program EIR.

3-7. As stated in the responses to Comments 2-3 and 2-4 of the California State Parks Foundation letter, CPSRA will have permeable boundaries, with multiple access points along its perimeter that will connect it to the surrounding planned residential neighborhood. Low-level security lighting will be needed at these access points as well as in parking and pedestrian areas, including along the Bay Trail. As stated in Guideline Energy-1 on page 4-56 of the CPSRA Preliminary General Plan and Draft Program EIR, which is also identified as a mitigation measure for Impact AES-3, Light and Glare, State Parks will light the minimum area for the minimum time, limit illumination to areas with actual night use or security concerns, and ensure that lighting will be directed downward to minimize light spillage as a project standard condition. These measures will minimize light spillage onto surrounding areas, including natural areas that provide habitat for wildlife and fish.

As noted by the commenter, Guideline Visitor Safety-12 directs park management to consider operational options such as closing the park from 10:00 p.m. to 5:00 a.m. Park operations, including operating hours, will be determined during future planning, when the management plan for CPSRA is developed. During development of the management plan, State Parks will consider public safety and security issues, the feasibility of closing the park at night given its permeable boundaries and multiple access points, and methods to minimize the effects of security lighting on wildlife and fish. In addition, State

Parks will continue to seek input from stakeholders and the public regarding management of the park.

3-8. As noted in Appendix A of the CPSRA Preliminary General Plan and Draft Program EIR, clapper rails were determined to be unlikely to occur within the park because tidal marsh habitat is currently limited and highly fragmented, and the closest known occurrence prior to the Heron's Head occurrence was over 2.5 miles south of CPSRA.

As noted by the commenter, CPSRA includes Yosemite Slough, where a wetland restoration project led by the California State Parks Foundation is currently underway. The restoration project will restore tidal wetland habitat within the park, and is intended to improve habitat for clapper rail as well as other special-status species, and to attract them to Yosemite Slough. This will be an environmental benefit of the project. The following goal and guidelines, which are presented on pages 4-58 of the CPSRA Preliminary General Plan and Draft Program EIR, demonstrate that the CPSRA General Plan intends to protect and enhance tidal marsh habitat, improve habitat for shorebirds, and manage visitor use to protect existing and enhanced tidal wetlands:

Goal Tidal Marsh-1: Create a Tidal Marsh Zone at CPSRA that promotes ecological processes and natural shoreline conditions characteristic of the San Francisco Bay.

Guideline Tidal Marsh-1: Protect and enhance existing tidal wetlands at CPSRA. Minimize disturbance to existing wetlands, and implement any mitigation onsite, where possible.

Guideline Tidal Marsh-2: Restore tidal wetlands in Yosemite Slough through continued implementation of the Yosemite Slough Restoration Project in partnership with the State Parks Foundation and local neighborhood organizations.

Guideline Tidal Marsh-3: Extend the Tidal Marsh Zone along the South Basin shoreline to connect to Yosemite Slough and improve habitat for shorebirds, small mammals, and other wildlife that depend on tidal marshes. Enhance existing pockets of tidal marsh at other points along the CPSRA shoreline.

Guideline Tidal Marsh-4: Use natural materials and a native-based plant palette in the Tidal Marsh Zone to maximize ecological functions and minimize disturbance to sensitive resources.

Guideline Tidal Marsh-5: Manage visitor use to provide opportunities for education and interpretation while protecting existing and enhanced tidal wetlands from degradation.

Guideline Tidal Marsh-6: Adopt an adaptive management approach for the creation and enhancement of the Tidal Marsh Zone, given the uncertainties surrounding the restoration of wetlands on artificial fill.

State Parks will work with the California State Parks Foundation and stakeholders, including Golden Gate Audubon Society, during future planning, detailed design, and implementation of the CPSRA General Plan to minimize disturbance to clapper rail and other special-status species that may be present at Yosemite Slough in the future.

3-9. Guideline Recreation-4, which requires that dogs be kept on leash while they are inside the park, and prohibits dogs in the beach shoreline zone, reflects State Parks' statewide dog policy. Enforcement of this policy is standard operating procedure within all state parks, and it will be enforced at CPSRA.

3-10. In response to this comment, the following new text has been added to Section 2.7.1, Recreation Trends, on page 2-90 of the CPSRA Preliminary General Plan and Draft Program EIR:

2.7.1 Recreation Trends

Numerous recreation studies have been conducted in recent years with the goal of creating a profile of California's outdoor recreationists. A 2009 study, The Complete Findings, Survey on Public Opinions and Attitudes on Outdoor Recreation in California (State Parks 2009g), found the five most popular outdoor recreation activities for adults in the San Francisco Bay Area to be walking for fitness or pleasure; picnicking in picnic areas; driving for pleasure or sightseeing; visiting outdoor nature museums, zoos, gardens or arboretums; and beach activities. Among the Bay Area's youth, the top five preferred activities were playing, sports, jogging/running, walking, and bicycling (State Parks 2009g).

<u>The Recreation Assessment Summary Report, prepared for the San Francisco Recreation and Park Department in 2004, evaluated the recreational needs of residents and identified key recreational issues that the community felt needed to be addressed. In a survey conducted for the Recreation Assessment, San Francisco residents ranked walking and biking trails as the top priority for recreational facilities. The recreational activities that the highest percentage of respondent households participates in include: running or walking (67%) and visiting nature areas (61%). Running or walking</u>

(28%) had the highest percentage of respondents select it as one of the four recreational activities they would participate in more often if more programming were made available by the City. There are five other activities that at least 20% of respondents selected as one of the four they would most participate in more often, including: visiting nature areas (24%); attending live theater/concert performances (24%); adult fitness/aerobics classes (22%); and recreational swimming/swim lessons (20%).

3-11. While the reconfigured boundary will reduce the widest part of the Heart of the Park, as stated on page 4-10 of the CPSRA Preliminary General Plan and Draft Program EIR, this area is not extensively used for recreation, nor does it possess high quality habitat value. The Heart of the Park is designated primarily as an active recreation zone in the Preliminary General Plan, as shown in Figure 4-1 on page 4-5 of the CPSRA Preliminary General Plan and Draft Program EIR. It would be the primary recreational hub of CPSRA, building on the existing facilities and visitor use concentrated around Jackrabbit Beach and the nearby lawn areas. The focus of improvements to the Heart of the Park is improved access to the Bay and water-oriented recreational opportunities. Both of these goals would be advanced by the funding provided under the Reconfiguration Agreement, and neither would be harmed by the change in the Park boundary or the proposed development of adjacent land. Because the Heart of the Park does not possess high quality habitat, and is not planned to in the future, the impacts of the boundary change and development on wildlife are not considered significant.

As stated on page 4-24 of the CPSRA Preliminary General Plan and Draft Program EIR, the General Plan recognizes that CPSRA, and especially the Yosemite Slough area, is an important resource for both common and special-status wildlife species, given the limited availability of natural habitat in the surrounding region. San Francisco Bay provides an open migratory corridor for birds to move back and forth across the Bay to more secluded, better-suited nesting and loafing sites. Balancing the protection and enhancement of wildlife habitat with park improvements and the changes planned for the surrounding neighborhood should be an important focus of natural resource management at CPSRA. Guideline Wildlife-3 calls for creation of upland vegetative buffers between trails and habitat areas, where necessary, to provide cover for wildlife and minimize disturbances from recreational activities. This guideline also directs park management to plant buffers with locally native trees, shrubs, and herbaceous species, and to consider limiting access by people and dogs to areas with sensitive wetland and upland habitats.

The planned adjacent development, which is not a part of the project under review here, will bring development closer to the park, and will increase the

number of park visitors. Section 4.8, Carrying Capacity, of the CPSRA Preliminary General Plan and Draft Program EIR describes an adaptive management process for visitor capacity that will be implemented to address uncertainties regarding future park visitation and achieve the goals and objectives of the General Plan. Table 4-1 identifies indicators and potential management actions that could be implemented to achieve Goal Wildlife-1: Maintain, protect and/or enhance habitat for wildlife species in CPSRA. The visitor capacity adaptive management process will be developed in more detail during preparation of management processes for the park. As future redevelopment occurs in the vicinity of CPSRA, ongoing adaptive management will assist the park manager in revisiting and adjusting the visitor carrying capacity for various parts of CPSRA.

The commenter notes that planning and implementation of the CPSRA General Plan is dependent on the Candlestick Point-Hunters Point Shipyard Phase II Project. As stated in Section 4.9, General Plan Phasing Process, specific park improvements that would be implemented under the General Plan would be phased in conjunction with the land exchange between State Parks and the City and County of San Francisco for the Candlestick Point-Hunters Point Shipyard Phase II Project, which was authorized under Senate Bill 792. The land exchange will occur in phases over the next 20 years, as construction of the Candlestick Point-Hunters Point Shipyard Phase II Project moves forward. The timing of these phases is set out in the Schedule of Performance contained in Exhibits C-B and D-B to the Hunters Point Shipyard Phase 2/Candlestick Point Disposition and Development Agreement. Pursuant to the Reconfiguration Agreement, State Parks will develop a list of park improvements following approval of the General Plan, and individual projects will be identified from that list and prioritized.

3-12. The commenter notes that the San Francisco 49ers football team has confirmed that they will leave San Francisco. The EIR reflects the existing conditions and foreseeable plans that were in place at the time the Notice of Preparation was published, which is consistent with the CEQA Guidelines Section 15125. The departure of the San Francisco 49ers from Candlestick Park stadium would not have a substantial effect on the environmental impact analysis presented in Chapter 5 of the CPSRA Preliminary General Plan and Draft Program EIR; therefore, the EIR does not need to be revised to reflect this change in conditions.

The planned bridge over the mouth of Yosemite Slough is not proposed as part of the CPSRA General Plan. The California State Parks Foundation and Lennar Urban have entered into an agreement regarding the design and construction of the planned bridge to ensure that it minimizes impacts to the planned restoration

and public access features. In addition, Guideline Agreements-4, presented on page 4-55 of the CPSRA Preliminary General Plan and Draft Program EIR, calls for park management to work with the City and County of San Francisco to ensure that the design and operations of the Yosemite Slough Bridge minimize impacts to bicyclists and pedestrians accessing CPSRA via the new bridge.

3-13. In response to this comment, new Guideline Wildlife-6 has been added to page 4-25 of the CPSRA Preliminary General Plan and Draft Program EIR, as follows:

> **Guideline Wildlife-6:** Consider incorporating the San Francisco Planning Department's Standards for Bird-Safe Buildings[1] into any new structures that are built within the park. These standards include:
>
> - Use of bird-safe glazing treatments on windows of new structures so that there is no more than 10% untreated glazing within the Bird Collision Zone (the portion of buildings most likely to sustain bird strikes; this area begins at grade and extends upwards for 60 feet); and
> - Use of minimal lighting, shielding lighting, and avoiding the use of uplighting and event searchlights.

3-14. In response to this comment, Guideline Wildlife-4, presented below as well as on page 4-25 of the CPSRA Preliminary General Plan and Draft Program EIR, has been identified as an additional mitigation measure for Impact UTIL-1, Increase Demand on Utilities and Service Systems, and has been added to Table S-1: Summary of Potential Impacts Resulting from the CPSRA Draft General Plan Preferred Alternative, beginning on page S-22 of the CPSRA Preliminary General Plan and Draft Program EIR:

> **Guideline Wildlife-4:** Reduce and work toward elimination of wildlife access to human food and garbage by using wildlife-proof trash containers and dumpsters throughout the park, increasing the frequency of trash collection, and educating the public about the detrimental effects of human food on the ecological balance. Post signs throughout the park informing people not to feed wildlife and to cover and store food and trash appropriately.

[1] Standards for Bird-Safe Buildings, San Francisco Planning Department, adopted July 14, 2011. Available at: http://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards%20for%20Bird%20Safe%20Buildings%20-%2011-30-11.pdf.

In response to this comment, new Guideline Waste-5 has been added to page 4-57 of the CPSRA Preliminary General Plan and Draft Program EIR, as follows:

> **Guideline Waste-5:** Consider implementing a monofilament recycling program to educate fishermen on the dangers of fishing line for many wildlife species and to provide opportunities to reduce monofilament waste in the environment.

In response to this comment, the following revisions have been made to the Impact UTIL-1 discussion on page 5-41 of the CPSRA Preliminary General Plan and Draft Program EIR:

> Impact UTIL-1: Increase Demand on Utilities and Service Systems.
>
> Potable Water, Wastewater Collection, and Storm Drainage
>
> Implementation of the General Plan would require extension, upgrade, and modification of some service infrastructure on the site to serve new facilities such as restrooms and landscape irrigation systems. It is not anticipated that the General Plan would result in a substantial increase in demand for potable water, wastewater collection or treatment capacity, or storm drainage management, and all facilities would be designed and managed per applicable standards. However, specific requirements for utilities would be determined at the time that project-level designs are developed. Implementation of Goal Energy-1, Goal Water-1, and Goal Waste-1, along with their supporting guidelines, as well as Guideline Wildlife-4, would provide for energy efficiency, implement conservation measures to minimize water use at CPSRA, and minimize generation of solid waste. Therefore, the General Plan would have a less-than-significant impact on utility demand and on service systems.

3-15. State Parks confirms that it will continue to work with the public and stakeholders, including the Golden Gate Audubon Society, on the development of interpretive materials for CPSRA.

3-16. Please see the response to Comment 3-14 of the Golden Gate Audubon Society letter.

3-17. State Parks agrees with the commenter's statement that wetlands should be included in interpretive signage and other materials. As stated on page 3-34 of the CPSRA Preliminary General Plan and Draft Program EIR, "important natural resources available for interpretation include habitat enhancement areas, tidal mudflats, Yosemite Slough wetlands, shorebirds, native plants, urban wildlife ecology, and resources related to San Francisco Bay, such as weather and wind

patterns, marine ecology, geology, hydrology, climate change, and sea level rise."

CPSRA Preliminary General Plan and Draft Program EIR Section 4.6.5, Interpretation and Education, identifies themes or take-away messages that interpretation should provide visitors to CPSRA. The San Francisco Bay Estuary Theme, described on page 4-36, covers the various natural forces and processes that make the estuary such an important ecological habitat. Included under this theme will be interpretation of the Bay's importance to migratory birds on the Pacific Flyway, as well as the Bay's role as a nursery for popular seafood species like Dungeness crab and salmon. The Natural Communities and Adaptations Theme, presented on page 4-36, covers the park's natural communities, from the wetlands of Yosemite Slough and the tidal mudflats extending out from the shoreline into the Bay, to the landscaped inland areas. Included will be the evolutionary adaptations of the plant and animal species that inhabit the various natural communities of the park, including shorebirds, native plants, fish, and invertebrates.

The CPSRA Preliminary General Plan and Draft Program EIR includes the following guidelines that address interpretation of wetlands and associated birds and wildlife:

Guideline Interpretation-2: Interpret management programs to restore, enhance and preserve CPSRA's significant natural and cultural resources. This will include interpreting wetland restoration and/or enhancement projects at Yosemite Slough and the South Basin shoreline. Use interpretive techniques to inform visitors about the park's sensitive resources and ways in which to minimize adverse impacts to these resources.

Guideline Interpretation-6: Integrate natural, cultural, aesthetic, and recreational interpretation. Interpret wildlife, plants, and people (past, present, and future) in the context of CPSRA's ecology, and in the context of the varied cultural landscape components in the park.

Guideline Interpretation-7: Demonstrate how perceptions of San Francisco Bay shoreline resources, particularly wetland and tideland areas, have changed over time, leading to vastly different approaches to using these areas. Include efforts to "reclaim" tidelands for agricultural and industrial use, former use of CPSRA as a dumping ground for urban waste, and present-day habitat restoration/ enhancement and recreational activities.

Guideline Interpretation-8: Interpret processes and relationships (patterns, cycles, interactions and adaptations) rather than isolated facts. For example, the various shorebirds that can be seen feeding on CPSRA's mudflats at low tide can

be used to discuss evolutionary adaptations that suit each shorebird species to its environment, and the threat that human impacts on any aspect of that environment pose to the species' populations.

Guideline Interpretation-9: Emphasize tactile, auditory and object-related media that are dynamic and dramatic. For example, interpretation of the Native American heritage of CPSRA can be enhanced with touchable reproductions of Ohlone lifeway objects and audio of present-day Ohlone sharing stories and songs. Interpretation of CPSRA tidal marsh areas can be enhanced with touchable props related to shoreline and mudflat plants and wildlife, audio of commonly seen CPSRA shorebirds, and direct experience with the resource—for example, feeling the mud on a mudflat or the stem of a pickleweed plant.

Guideline Interpretation-10: Use a well-designed mixture of media to make interpretation interesting and accessible to all. For example, personal interpretation such as guided interpretive mudflat and tidal marsh walks; self-guiding non personal interpretation such as wayside signs and exhibits; and other media such as demonstrations, audio-visual programs and brochures.

Guideline Interpretation-11: Consider the use of remote interpretation techniques (e.g., interactive websites, live webcams, podcasts, downloadable/mailable activity books, State Parks' PORTS program and other remote media) to reach a wider audience. Wetland restoration and/or enhancement activities at Yosemite Slough and the South Basin shoreline would be good candidates for remote interpretation. These techniques could reach students in area schools who could remotely access CPSRA educational resources for classroom activities, those visitors who would like a close-up look at sensitive wildlife habitats without adversely impacting the habitat, visitors with disabilities who cannot access certain park areas, and potential visitors interested in CPSRA and its resources.

Guideline Tidal Marsh-5: Manage visitor use to provide opportunities for education and interpretation while protecting existing and enhanced tidal wetlands from degradation.

As stated in the response to Comment 3-15 of the Golden Gate Audubon Society letter, State Parks confirms that it will continue to work with the public and stakeholders including the Golden Gate Audubon Society on the development of interpretive materials for CPSRA.

3-18. As stated on page 4-34 of the CPSRA Preliminary General Plan and Draft Program EIR, important natural resources available for interpretation include habitat enhancement areas, native plants, and urban wildlife ecology, among others. The Natural Communities and Adaptations Theme, presented on page 4-

36, covers the park's natural communities, including the landscaped inland areas. Included in this theme will be the evolutionary adaptations of the plant and animal species that inhabit the various natural communities of the park, including shorebirds, native plants, fish and invertebrates. The Habitat Restoration/Enhancement Theme, presented on pages 4-36 through 4-37, covers the extensive restoration/enhancement work by State Parks, volunteers and partners to transform the park's heavily disturbed landscape into productive natural habitat.

The CPSRA Preliminary General Plan and Draft Program EIR includes the following guidelines that address terrestrial habitat and/or wildlife:

Guideline Wildlife-1: Select native trees, shrubs, and herbaceous species for future planting that provide habitat for the wildlife species that currently use CPSRA. Consider the habitat needs of raptors, shorebirds, small mammals, and other wildlife. Enhance grassland/scrub habitat in the Candlestick Meadows area for upland wildlife species.

Guideline Wildlife-2: Maximize connectivity between vegetation communities, such as the grassland/coastal shrub and coastal native planning zones, to facilitate the movement of wildlife throughout the park. Provide transition zones between vegetation communities. Where possible, facilitate connections to other parks and open space areas in the region, such as Bayview Hill.

Guideline Wildlife-3: Create upland vegetative buffers between trails and habitat areas, where necessary, to provide cover for wildlife and minimize disturbances from recreational activities. Plant buffers with locally native trees, shrubs, and herbaceous species. Consider limiting access by people and dogs to areas with sensitive wetland and upland habitats.

Guideline Grassland/Coastal Shrub-1: Maximize the connectivity of Grassland/Coastal Shrub Zone across different geographic areas of CPSRA to preserve and enhance wildlife migration corridors and other important ecological functions.

Guideline Interpretation-6: Integrate natural, cultural, aesthetic, and recreational interpretation. Interpret wildlife, plants, and people (past, present, and future) in the context of CPSRA's ecology, and in the context of the varied cultural landscape components in the park.

Guideline Grassland/Coastal Shrub-2: Provide opportunities for nature-based recreation (e.g., trail use and wildlife viewing), that are low-impact and minimize disturbance to wildlife. Small-scale facilities, such as family gathering areas, and natural surface trails are most appropriate in the Grassland/Coastal Shrub Zone.

Create the nature theater as a flexible facility that provides opportunities for special events or quiet recreation, such as relaxing, when not in use. If necessary, implement seasonal restrictions regarding the nature theater to protect nesting and breeding wildlife.

Guideline Grassland/Coastal Shrub-3: Monitor visitor use to ensure that it does not degrade sensitive resources, such as wildlife habitat, and adjust management, as necessary.

Guideline Grassland/Coastal Shrub-4: Create a wildlife habitat focus area within the Candlestick Meadows area that preserves and enhances habitat for birds, small mammals, and other common wildlife known to occur at CPSRA. Manage the wildlife habitat focus area in a manner that may also support wildlife with a potential to occur at the park.

Guideline Grassland/Coastal Shrub-5: Use natural materials and plant species native to the San Francisco Bay Area to maximize the habitat value of the Grassland/Coastal Shrub Zone. Select vegetation species to ensure that this zone serves as a transition area between the Tidal Marsh and Coastal Native Zones.

As stated in the response to Comment 3-15 of the Golden Gate Audubon Society letter, State Parks confirms that it will continue to work with the public and stakeholders including the Golden Gate Audubon Society on the development of interpretive materials for CPSRA.

3-19. State Parks agrees with the commenter that interpretation related to non-motorized marine recreation should include information on marine birds and wildlife. Goal Interpretation-3 and related Guideline Interpretation-6, presented on page 4-43 of the CPSRA Preliminary General Plan and Draft Program EIR, acknowledge the importance of interpreting the relationships between natural and recreational resources:

Goal Interpretation-3: CPSRA visitors will make connections between natural, cultural, aesthetic, and recreational resources, and understand individual natural and cultural resources at CPSRA as part of larger processes and relationships.

Guideline Interpretation-6: Integrate natural, cultural, aesthetic, and recreational interpretation. Interpret wildlife, plants, and people (past, present, and future) in the context of CPSRA's ecology, and in the context of the varied cultural landscape components in the park.

Guideline Interpretation-8, also presented on page 4-43 of the CPSRA Preliminary General Plan and Draft Program EIR, addresses shorebirds specifically and the potential effects of human activities on their populations:

Guideline Interpretation-8: Interpret processes and relationships (patterns, cycles, interactions and adaptations) rather than isolated facts. For example, the various shorebirds that can be seen feeding on CPSRA's mudflats at low tide can be used to discuss evolutionary adaptations that suit each shorebird species to its environment, and the threat that human impacts on any aspect of that environment pose to the species' populations.

3-20. Please see the response to Comment 3-2 of the Golden Gate Audubon Society letter. As State Parks moves forward with future planning and detailed design for CPSRA, it will balance the demands of recreational users with the needs of wildlife, and will continue to seek input from the public and stakeholders, including the Golden Gate Audubon Society.

4

Arc Ecology

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Comments of Arc Ecology on the CPSRA General Plan and Environmental Impact Report

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February 21, 2012

Summary: We support the Nature in the City Alternative

Arc Ecology Comments

Arc Ecology Comment 1

The General Plan and EIR consistently misstate the total amount of **"new"** park and open space land accounted for in Candlestick Point—Hunters Point Shipyard Phase 2 (CP/HPS P2).

CPSRA General Plan & EIR

Candlestick Point State Recreation Area Preliminary General Plan and Draft Program Environmental Impact Report | 1-1

Redevelopment of this area will create over 10,500 residential units, approximately 700,000 square feet of destination retail and entertainment space, over 2.5 million square feet of commercial space oriented around green science and technology campus, and ***more that 300 acres of new waterfront parks****.*

Table II-2 Existing and Proposed Uses

	Existing Uses	Existing Uses to Be Retained	Proposed Uses	Total
Parks and Open Space (acres)				
State Parkland (acres)	120.2	91.0	5.7	96.7
Dual-Use Parking/Parks[d] (acres)	0	0	91.6	91.6
Parks and Open Space (acres)	0	0	148.1	148.1
Subtotal Parks and Open Space	*120.2*	*91.0*	*245.4*	*336.4*

SOURCE: Lennar, 2009

The General Plan and EIR (GP/ EIR) consistently refer to "in excess of 300 acres of new" or "approximately 330 acres of new" park land in the CP/HPS P2 plan. This is an error. The graph above is copied from the CP/HPS P2 EIR approved in July 2010. It clearly shows that the total apportionment of park and open space lands is 336.4 acres of which 91 acres comprising CPSRA are pre-existing.

This issue is important. Reporting that there is in excess of 300 acres of NEW parkland, gives the impression that when combined with EXISTING parkland the aggregate total is much greater—on the order of 400 acres or more total. The question of how many acres there actually are is direct relevance to the concern voiced in the CPSRA General Plan:

> *"First, the level of visitation based on the future residents of the adjacent planned Candlestick Point-Hunters Point Shipyard Phase II Project and other development projects in the neighborhood is difficult to predict, especially considering development phasing and the evolving demand for the park and its facilities. While visitation levels are expected to increase, it is not known by how much or at what rate the increase will occur over the next 20 years."*

The difference between having 300 or 400 acres available to serve the recreational

Candlestick Point State Recreation Area Preliminary General Plan and Draft Program Environmental Impact Report | 2-85

2.6.4 Redevelopment Projects

The Candlestick Point-Hunters Point Shipyard Development Project

Together, the Candlestick Point and Hunters Point Shipyard sites comprise over 700 acres along San Francisco's southeastern waterfront (SFOEWD 2009). Redevelopment of the area stems from the Bayview Hunters Point Redevelopment Plan, which focuses on generating economic development, affordable housing, and community enhancements (SFRA 2009a). The new development will create over 10,500 residential units, approximately 700,000 square feet of destination retail and entertainment space, over 2.5 million square feet of commercial space oriented around a green science and technology campus, ***and more than 300 acres of new waterfront parks.***

4-1

Arc Ecology Comments

Arc Ecology Comment 1 continued;

interests of 60,000 people is significant. Even where the General Plan/ EIR attempts to delineate between existing CPSRA and CP/ HPS P2 land it is confusing and apparently inaccurate —as shown by the quote on the right.

Presenting an accurate picture of park and open space land available is critical to public understanding of the trade-offs between the alternative land-use strategies discussed in the GP/EIR.

Recommendation: There are a number of locations in the document where this error occurs and it would be helpful if they were either corrected or substantiated.

CPSRA General Plan & EIR

Candlestick Point State Recreation Area Preliminary General Plan and Draft Program Environmental Impact Report | 2-85

2.6.4 Redevelopment Projects
The Candlestick Point-Hunters Point Shipyard Development Project

Plans for Candlestick Point include the creation of 7,850 residential units, 760,000 square feet of retail, 150,000 square feet each of office and hotel space, ***and over 104 acres of new and improved parkland, approximately 97 acres of which is CPSRA land*** *(SFRA and SFPD 2009).*

4-1

AE Comment 2: Estimating Visitors

> We would appreciate an explanation as to why it would be difficult to develop a projection of visitors to CPSRA based on the development plans for CP/HPS P2. The one provided in the EIR does not seem reasonable.

As noted above and in many places in the CPSRA General Plan and EIR there is an approved EIR for CP/HPS P2 whose projected land. The CP/HPS P2 is offered in many places in this document as a rationale for a proposed action. Nevertheless in this section the visitation result from the approved land-use plan for this project seems somehow to be difficult to predict. We find this difficult to comprehend.

While we acknowledge that there will be phasing to the construction of this development, it is however fact that the plan is to construct 10,500 units and that somewhere around 20,000 new residents will migrate to this area and use this park at some point or other over the next 20 – 30 years.

Recommendation: Combine the CP/ HPS P2 projected population with other projections for the Bayview Hunters Point Project Area and the current population and one has a reasonable basis upon which to apply standard park planning formulas to derive the probable number of visitors.

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"First, the level of visitation based on the future residents of the adjacent planned Candlestick Point-Hunters Point Shipyard Phase II Project and other development projects in the neighborhood is difficult to predict, especially considering development phasing and the evolving demand for the park and its facilities. While visitation levels are expected to increase, it is not known by how much or at what rate the increase will occur over the next 20 years. Ongoing monitoring and adjustments will need to be made to respond to changing visitation levels and demand for park facilities."

4-2

Arc Ecology Comments

AE Comment 3: 1.1 Location and Regional Context

> Does not adequately describe surrounding industrial uses and inaccurately represents the amount of open space associated with the CP/HPS project.

Much of the General Plan and EIR (GP/EIR) are given over to a discussion of the CP/HPS P2 plan and Arc Ecology does not object as these two sites make up most of the neighboring property. Most, but not all.

The statement: "*the Bayview Hunters Point community borders CPSRA to the north and west, and the surroundings are primarily industrial"* is about as much of a description as this document provides regarding its other major land-based neighbor. Nevertheless it is this industrial area that surrounds the Yosemite Slough portion of CPSRA and according to the 1998 Geomatrix report cited by the GP/EIR is a heavily contaminated area. This area includes hundreds of contaminated sites including one involved in the State of California's own Superfund program. Contaminated adjacent properties were also cited by the State Parks Foundation in its environmental assessment of restoration work at Yosemite Slough.

Recommendation: Given that these adjacent industrial properties may bear on the environmental quality of a substantial portion of CPSRA it would seem reasonable to include a larger description of this area within this "Settings" section of the CPSRA GP/EIR and elsewhere appropriate and of nearly equal depth to the frequent and repetitious description included for the CP/ HPS P2 project.

CPSRA General Plan & EIR

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> *As shown in Figure 1-2, the Bayview Hunters Point community borders CPSRA to the north and west, and the surroundings are primarily industrial. Within this community are the Candlestick Point and Hunters Point Shipyard sites, which are located west of and northeast of CPSRA, respectively and comprise over 700 acres along San Francisco's southeastern waterfront. Redevelopment of this area will create over 10,500 residential units, approximately 700,000 square feet of destination retail and entertainment space, over 2.5 million square feet of commercial space oriented around green science and technology campus, and more that 300 acres of new waterfront parks.*

4-3

Arc Ecology Comments

CPSRA General Plan & EIR

AE Comment 4: SB 792 Facilitated the Sale of Park Land Not An Endowment

SB 792 offers a number of descriptions for the exchange of CPSRA land for cash. Arc Ecology was a participant in the negotiations over its language and the amount of acreage to be offered. At numerous times during the negotiations representatives of Lennar indicated that they were only willing to pay market value for the land.

Recommendation: Unless there is some document that could be incorporated in the GP/ EIR that verifies that Lennar spent more than the value of the property to be exchanged for cash, it is Arc Ecology's perspective that it would be more appropriate to use the more common parlance of "sold or compensated." For example: State Parks entered into land exchange with the City of San Francisco that reconfigured the park boundry—adding land in some of the narrowest areas and removing it from others. In exchange, CPSRA will be (because no funds have been exchanged at this point) ***compensated*** for the value of the acreage ***sold*** to Lennar in excess of the land swaped. The funds from this ***transaction*** will be used for improvements to the park over the long-term.

Candlestick Point State Recreation Area Preliminary General Plan and Draft Program Environmental Impact Report | 1-10

> In addition, State Parks entered into a land exchange with the City of San Francisco that reconfigured the park boundary—adding land in some of the narrowest areas and removing it from others. In exchange, CPSRA received an endowment to fund improvements to the park over the long-term.

4-4

AE Comment 5: Redevelopment

Recommendation: Please delete of change references to redevelopment projects. Except for CP/HPS P2 they no longer exist.

Candlestick Point State Recreation Area Preliminary General Plan and Draft Program Environmental Impact Report | 1-4

- **Visitation Valley Redevelopment project description —-**

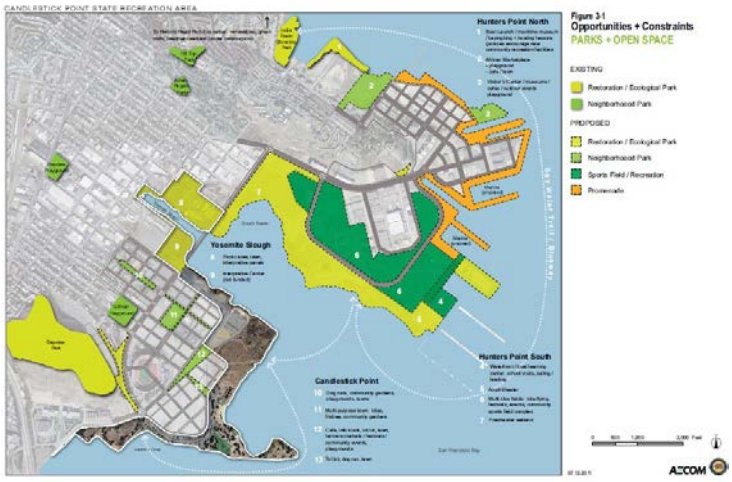
4-5

AE Comment 6: Remove References to 49er Shipyard Stadium

The map to the right presents a view of the Shipyard that includes a football stadium. It is unrealistic to continue to base land use plans on a project that is highly unlikely to come to fruition. The loss of the stadium bares directly on the amount of acreage set aside for open space and park land. In all other non-stadium CP/ HPS P2 concepts the parking/ playing fields are reduced.

Recommendation: Change to non-stadium preferred alternative map.

3.2.1 Recreation and Visitor Resources



4-6

Arc Ecology Comments

AE Comment 7: A Program not A Project EIR

There seems to be confusion in this document as to whether it satisfies the provisions of a Program or Project EIR. The first two paragraphs on the right seem to conflict with the third paragraph:

> *"Therefore, the CEQA analysis detailed in the EIR that accompanies this General Plan is intended to be adequate for many future actions implemented as part of site development in a manner consistent with the goals and guidelines in the General Plan."*

Even this paragraph reveals inner conflicts of meaning and intentions:

> *"Some actions described in the General Plan may require additional CEQA analysis documentation once the project details are known, while others may simply need to implement all goals, guidelines, and specific mitigation measures identified in this document to ensure they are in environmental compliance*. "

Just as the two sections of the third paragraphs above conflict with each other so does the beginning of the fourth paragraph conflict its last sentance.

> *"However, because this is a program-level EIR for a General Plan, that detailed project-level analysis is not presented in this document."*

The GP/ EIR is not an addendum to the CP/ HPS P2 EIR. It is a stand alone document discussing a separate project not considered except in the broadest of terms in the City EIR. The GP/ EIR needs to satisfy the conditions required of a project level study if State Parks Department wishes to avoid further analysis down the road.

Recommendation: This document does not provide sufficient detail to be considered a Project EIR. We suggest that all but the last paragraph on the right be deleted for the sake of clarity as it sufficiently states the process undertaken for determining when to conduct further analysis.

CPSRA General Plan & EIR

Candlestick Point State Recreation Area Preliminary General Plan and Draft Program Environmental Impact Report | 1-11

This General Plan also serves as a first-tier EIR, as defined in Section 15166 of the State CEQA Guidelines. Chapter 5, Environmental Analysis, will be a reference for future environmental documents that could provide more detailed information and analysis for site-specific developments and projects….

Actions that may result from adoption and implementation of this General Plan at some time in the future were anticipated, and potential impacts resulting from these actions were analyzed. Impact mitigation measures were incorporated into this General Plan as goals and guidelines, wherever possible, to help ensure that planned actions described in the General Plan, including those to be implemented in the future, will not result in significant environmental impacts.

Therefore, the CEQA analysis detailed in the EIR that accompanies this General Plan is intended to be adequate for many future actions implemented as part of site development in a manner consistent with the goals and guidelines in the General Plan. Some actions described in the General Plan may require additional CEQA analysis documentation once the project details are known, while others may simply need to implement all goals, guidelines, and specific mitigation measures identified in this document to ensure they are in environmental compliance. 4-7

Both Chapter 2, Existing Conditions, and Chapter 5, Environmental Analysis, reference the Candlestick-Hunters Point Shipyard Phase II Draft Environmental Impact Report (San Francisco Redevelopment Agency and San Francisco Planning Department 2009), which presented a detailed, project-level analysis of the proposed development of and adjacent to CPSRA. The existing conditions and environmental impact analysis presented in this CPSRA General Plan are based on the information presented in that project-level EIR. However, because this is a program-level EIR for a General Plan, that detailed project-level analysis is not presented in this document.

All projects that may be implemented in the future as a result of adopting this General Plan will be subject to CEQA review according to State CEQA Guidelines Section 15168, in light of the information in the EIR prepared for this General Plan, to determine if additional CEQA documentation is necessary. The type of additional CEQA documentation completed will be determined based on State CEQA Guidelines Sections 15162–15164. When future projects requiring additional environmental review are implemented, State Parks may refer to the EIR prepared for the General Plan as a starting point for a "tiered CEQA analysis" per Section 15168 of the State CEQA Guidelines.

Arc Ecology Comments

AE Comment 8: Develop a Watershed Management Plan for CPSRA

> The Park occupies the bottom south eastern portion of the Yosemite/ South Basin watershed, as part of its stewardship role it would be appropriate and helpful if the CPSRA plan could incorporate a general watershed management plan guideline to provide a critical overarching rationale for the Parks approach to Hydrology and Water Quality management into its General Plan which could then be assessed as part of its EIR as a mitigation for impacts.

While the historical description presented in the GP/ EIR is correct regarding San Francisco's drainage basins/ watersheds, it is not entirely correct.

Arc Ecology mapped the Yosemite Basin in 2004. Our research indicated that there was both an upper and lower catchment to the watershed. The upper catchment is bounded by McLaren Park, the basin's headwaters to the south and west, and Silver Terrace to the east, whereas the Bayview Hunters Point lower catchment is bounded by Bayview Hill on the south, Hunters Point Hill on the north and Silver Terrace on the West.

Not all water draining from the lower catchment is diverted into San Francisco's sewer system. The BVHP Bayshore Industrial District and CPSRA share the base of the lower catchment as the GP/ EIR states:

> ***2-8 | Candlestick Point State Recreation Area Preliminary General Plan and Draft Program Environmental Impact Report***
>
> *Most of CPSRA drains directly to the Bay, either as direct runoff or through an outfall located west of the Windsurf Circle (The Neck) (SFRA and SFPD 2009).*

Recommendation: An overall watershed management plan would be the most comprehensive approach to addressing all of the parks water management and most of its pollution control requirements. Establishing one would be consistent with BCDC and SWQCB policy.

CPSRA General Plan & EIR

Candlestick Point State Recreation Area Preliminary General Plan and Draft Program Environmental Impact Report | 2-5

Hydrology and Water Quality

Drainage

Urban development has obscured and modified San Francisco's historic drainage basins or watersheds (SFRA and SFPD 2009). The majority of the City and County of San Francisco's creeks are buried underground in culverts or filled so that watersheds drain to San Francisco's sewer system. Most of CPSRA falls within the Yosemite Basin, which historically drained into Yosemite Creek. A small area of CPSRA west of the intersection of Jamestown Avenue and Hunters Point Expressway lies within the Sunnydale Basin.

Yosemite Basin

The Yosemite Basin includes the Bayview Hunters Point neighborhood, as well as portions of Portola, Bayview Heights, Excelsior, and Silver Terrace in southeast San Francisco. Yosemite Basin is approximately three square miles in area and is bounded by McLaren Park to the west and Hunters Point and San Francisco Bay to the east (SFPUC 2008).

Sunnydale Basin

The Sunnydale Basin is 1.6 square miles in area and is located on the southeastern side of the city, bordering CPSRA in the Last Port area. The Visitacion Valley neighborhood, and portions of the Bayview Heights, Excelsior, and Crocker Amazon neighborhoods, is located within this basin. This basin is bounded by McLaren Park to the west and Candlestick Park stadium and San Francisco Bay to the east (SFPUC 2008). 4-8

2-8 | Candlestick Point State Recreation Area Preliminary General Plan and Draft Program Environmental Impact Report

- Most of CPSRA drains directly to the Bay, either as direct runoff or through an outfall located west of the Windsurf Circle (The Neck) (SFRA and SFPD 2009).

Arc Ecology Comments

CPSRA General Plan & EIR

AE Comment 9: Consider improved connectivity through the inclusion of wildlife corridors around Yosemite Slough into the Shipyard and beyond to Islais Creek.

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CPSRA also plays a role in the region's ecological network (Figure 3-7). Its proximity to nearby parks—specifically Bayview Hill and San Bruno Mountain—promotes connectivity for wildlife, such as raptors. The park's location on San Francisco Bay further connects it to a regional resource. CPSRA's natural resources present opportunities not only for enhancement but also for interpretation, education, and sustainable design.

4-9

AE Comment 10: Please correct the statistics presented in this section to reflect those reported under demographics.

3-16 | Candlestick Point State Recreation Area Preliminary General Plan and Draft Program Environmental Impact Report

Environmental Justice

Bayview Hunters Point is predominantly a low-income community of color which has historically served as the dumping ground for San Francisco's most toxic industries. Fifty percent of community residents are African-American, twenty-five percent are Asian-Pacific Islander, fifteen percent are Latino, and ten percent are white. More than fifty percent of area households are considered low or very low income (Literacy for Environmental Justice, 2011). While one third of the Bayview's residential population is comprised of children — the highest rate in the city — there are over 325 toxic sites in this six-square-mile community. Two dozen schools and childcare centers are located within three miles of the Hunters Point Naval Shipyard, a federal Superfund site.

4-10

AE Comment 11: Arc Ecology concurs with the Golden Gate Audubon Society's objection to this section of the GP/ EIR. The bridge is a net negative to both park and community.

Our analysis of this issue is quite different. The bridge will create a visual barrier between Yosemite Slough and South Basin dividing both the park and community. Bus headways of 2 to 10 minutes have the potential for creating hazards to pedestrians using the bridge and will impact the very experience the GP/ EIR is promoting. The bridge will not serve an important section of the BVHP community nor will it improve truck transit. Finally the bridge could negatively impact existing wildlife corridors around the Slough.

3.3.2 Yosemite Slough Bridge

The planned Candlestick Point-Hunters Point Shipyard Phase II Project includes a vehicle bridge that would extend over Yosemite Slough, connecting Arelious Walker Drive to Fitch Street. The proposed bridge would be restricted to city buses, with private vehicular traffic allowed only during San Francisco 49ers home games— Approximately 10 days from late summer to mid-winter. Bicycles and pedestrians would be allowed on the bridge on non-game days. The proposed bridge poses compatibility issues with the planned Yosemite Slough Restoration Project, which will expand public access and wildlife habitat, including islands for nesting birds. The California State Parks Foundation, the organization planning and funding the restoration project for California State Parks, and Lennar Urban have agreed to collaborate on the design and construction of the bridge to ensure that it minimizes impacts to the planned restoration and public access features and that it resolves the compatibility issue (CSPF 2010).

4-11

Arc Ecology Comments

AE Comment 11: We strongly disagree with the negative cast placed over this scenario

1. There would be numerous and specific benefits associated with changes or the loss of CP/ HPS P2. While Arc Ecology would like to see the project move forward that is not the same as excluding the possibility of benefits if it did not.
2. There would be specific benefits to having CPSRA remain within its current boundaries. BVHP is an underserved community regarding quiet open space and the current configuration of the park lends to a more natural experience than the one currently contemplated.
3. The loss of funding contemplated through the sale of CPSRA park land authorized in SB 782 is not the only potential source of revenue for park improvements. The State Parks Foundation has already demonstrated that there is a market in local philanthropy for funding park improvements. Raising $14 million toward Yosemite Slough restoration is a strong indicator that there is a large opportunity here. Furthermore California State Parks could restore the funding from Parking Concessions to its stated purpose of funding improvements and programming for CPSRA. It is the diversion of these funds into State Parks coffers that created the conditions found in the park today.

CPSRA General Plan & EIR

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The following assumptions would apply if the Candlestick Point-Hunters Point Shipyard Phase II Project were not to move forward:
1. The existing CPSRA boundary would remain in place, and the exchange of land between State Parks and the City and County of San Francisco for the Candlestick Point-Hunters Point Shipyard Phase II Project that was authorized under Senate Bill 792 would not occur. Consequently, the City and County of San Francisco would not provide State Parks the funding that would have been provided as part of the land exchange, which includes $40 million for park development and $10 million for operations and maintenance.

the funding that would be provided as part of the land exchange for the Candlestick Point-Hunters Point Shipyard Phase II Project. Because less funding would be available under Alternative 2, it includes fewer park improvements than the Preferred Alternative. Alternative 2 would be refined to include the same level of detail as the Preferred Alternative presented in this General Plan, with input from the public, and would be subject to further environmental review. Please refer to Section 5.8, Alternatives Analysis, for further discussion of Alternative 2.

4-12

Comment Letter 4 – Arc Ecology

4-1. In response to this comment, the CPSRA Preliminary General Plan and Draft Program EIR has been revised in several places to clarify the new park acreage that is associated with the adjacent planned Candlestick Point-Hunters Point Shipyard Phase II Project.

The second paragraph on page 1-1 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as follows:

> As shown in Figure 1-2, the Bayview Hunters Point community borders CPSRA to the north and west, and the surroundings are primarily industrial. Within this community are the Candlestick Point and Hunters Point Shipyard sites, which are located west of and northeast of CPSRA, respectively, and comprise over 700 acres along San Francisco's southeastern waterfront. Redevelopment of this area will create over 10,500 residential units, approximately 700,000 square feet of destination retail and entertainment space, over 2.5 million square feet of commercial space oriented around a green science and technology campus, and ~~more than 300~~approximately 240 acres of new waterfront parks. The project contains several phases: the Hunters Point Shipyard Phase 1 development is currently underway to construct 1,600 homes and 25 acres of open space. The remainder of the development will occur as part of the Candlestick Point-Hunters Point Phase II Project, with full build-out expected by 2020.

The first paragraph on page 1-4 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as follows:

> This second phase contains the Candlestick Point subcomponent, a 281-acre area that includes 120 acres of CPSRA as well as Candlestick Park stadium (home to the San Francisco 49ers football team) and the Alice Griffith public housing site, which are located immediately west of CPSRA. Plans for Candlestick Point include the creation of 7,850 residential units, 760,000 square feet of retail, 150,000 square feet each of office and hotel space, and approximately 7 acres of new parkland, as well as improvements within CPSRA. ~~over 104 acres of new and improved parkland, approximately 97 acres of which is CPSRA land~~ (SFRA and SFPD 2009).

The Candlestick Point-Hunters Point Shipyard Development Project discussion on page 2-85 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as follows:

The Candlestick Point-Hunters Point Shipyard Development Project

Together, the Candlestick Point and Hunters Point Shipyard sites comprise over 700 acres along San Francisco's southeastern waterfront (SFOEWD 2009). Redevelopment of the area stems from the *Bayview Hunters Point Redevelopment Plan*, which focuses on generating economic development, affordable housing, and community enhancements (SFRA 2009a). The new development will create over 10,500 residential units, approximately 700,000 square feet of destination retail and entertainment space, over 2.5 million square feet of commercial space oriented around a green science and technology campus, and ~~more than 300~~approximately 240 acres of new waterfront parks. The project contains several phases: the Hunters Point Shipyard Phase I development is currently underway to construct 1,600 homes and 25 acres of open space. The remainder of the development will occur as part of the Candlestick Point-Hunters Point Phase II Project, with full build-out expected by 2020. This second phase contains the Candlestick Point subcomponent, a 281-acre area that includes 120 acres of CPSRA, Candlestick Park stadium, and the Alice Griffith public housing site. Plans for Candlestick Point include the creation of 7,850 residential units, 760,000 square feet of retail, 150,000 square feet each of office and hotel space, and approximately 7 acres of new parkland, as well as improvements within CPSRA. ~~over 104 acres of new and improved parkland, approximately 97 acres of which is CPSRA land~~ (SFRA and SFPD 2009).

The Neighborhood Open Space and Recreation discussion on page 3-3 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as follows:

Neighborhood Open Space and Recreation

The planned Candlestick Point-Hunters Point Shipyard Phase II Project includes ~~330~~approximately 240 acres of new parks and open space (Lennar Corporation 2009). Neighborhood parks, sports fields, shoreline promenades, and ecological restoration projects incorporate a wide range of recreational, cultural, educational, and nature-based programs (Figure 3-1). As a result, CPSRA will not need to provide all types of recreation facilities, duplicating those planned elsewhere in the neighborhood. Facilities such as dog runs and tennis courts do not necessarily reflect the State Parks mission, and therefore, are more appropriately located beyond CPSRA. The

> comprehensive park and open space enhancements planned for the neighborhood will allow CPSRA to focus on providing programs that reflect its unique characteristics and visitor interests.

The fourth paragraph on page 5-61 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as follows:

> Descriptions of these redevelopment projects are presented in Section 2.6, Planning Influences. The Candlestick Point-Hunters Point Shipyard Phase II Project, in particular, will substantially change the neighborhood surrounding CPSRA. As stated in Section 2.6, the new development will create over 10,500 residential units, approximately 700,000 square feet of destination retail and entertainment space, over 2.5 million square feet of commercial space oriented around a green science and technology campus, and ~~more than 300~~ approximately 240 acres of new waterfront parks. The EIR that was prepared for the development determined that it would have considerable contributions to cumulative traffic and air quality impacts that would be significant and unavoidable (SFRA and SFPD 2009). The development would also have significant and unavoidable noise and historical resources impacts.

4-2. The CPSRA Preliminary General Plan and Draft Program EIR includes goals and guidelines for the management and protection of sensitive species and places, and plans for how people may enjoy those resources without damaging the special aspects of CPSRA. During the planning phase of a park, State Parks designs features that are in accordance with what is allowable or that fits in a particular area. For example, if 20 parking spaces are installed in a parking lot, a maximum of 20 vehicles will be able to utilize the area. Or, if a campground contains 15 spaces, 15 people can be accommodated using the reservation system. With proper design, visitors will continue to another area once the feature has reached capacity. State Parks staff will receive feedback from CPSRA users and patrol staff regarding how use of park features is impacting the surrounding environment. If an area becomes overused and/or begins to sustain damage, the resource will be evaluated and managed appropriately. Management of an overused resource could include shoring up trails, adding or subtracting parking or otherwise decreasing visitor use, or closing a trail or park. Thus, unlike a general plan for a city or county that plans for the accommodation of a certain number of residents, the goal of the CPSRA Preliminary General Plan and Draft EIR is not to estimate visitors, but to examine the park's resources and determine how visitors can be accommodated in a safe and environmentally friendly manner.

Funding for the proposed park improvements identified in the CPSRA Preliminary General Plan will be provided in phases in conjunction with the phasing of the

land exchange between the San Francisco Redevelopment Agency and State Parks authorized under Senate Bill 792. Once implemented, these park improvements are expected to attract visitors from throughout the region and the state. As stated by the commenter, the adjacent planned Candlestick Point-Hunters Point Shipyard Phase II Project is expected to construct new residential units. Construction of the Candlestick Point-Hunters Point Shipyard Phase II Project will occur in phases over the next 20 years. The CPSRA Preliminary General Plan and Draft Program EIR includes an adaptive management process for visitor capacity that will be implemented to address uncertainties regarding future park visitation and achieve the goals and objectives of the General Plan (see Section 4.8, Carrying Capacity).

As stated on page 4-64 of the CPSRA Preliminary General Plan and Draft Program EIR, visitation, individual or group usage, time, and types and patterns of recreational use will all contribute to impacts on CPSRA natural and recreational resources. Implementation of the adaptive management process described in Section 4.8 is vital to the success of adaptive management for CPSRA. Furthermore, as future redevelopment occurs in the vicinity of CPSRA, ongoing adaptive management will assist the park manager in revisiting and adjusting the visitor carrying capacity for various parts of CPSRA.

4-3. In response to this comment, the second paragraph on page 1-1 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as follows:

> As shown in Figure 1-2, the Bayview Hunters Point community borders CPSRA to the north and west, and the surroundings are primarily industrial. The South Basin industrial area, which surrounds Yosemite Slough and extends west to US-101, contains a variety of small-scale industrial uses, such as auto repair shops, food distributors, bulk warehouses, and recycling facilities. Light industrial uses such as metal fabrication and distribution facilities are located north of Carroll Avenue. West of Hawes Street and west and south of Candlestick Park, the predominant land use is single-family residential. Within the~~is~~ Bayview Hunters Point community are the Candlestick Point and Hunters Point Shipyard sites, which are located west of and northeast of CPSRA, respectively, and comprise over 700 acres along San Francisco's southeastern waterfront. Redevelopment of this area will create over 10,500 residential units, approximately 700,000 square feet of destination retail and entertainment space, over 2.5 million square feet of commercial space oriented around a green science and technology campus, and more than 300 acres of new waterfront parks. The project contains several phases: the Hunters Point Shipyard Phase 1 development is currently underway to construct 1,600 homes and 25 acres of open space.

> The remainder of the development will occur as part of the Candlestick Point-Hunters Point Phase II Project, with full build-out expected by 2020.

Please see the response to Comment 3-1 of the Golden Gate Audubon Society comment letter for revisions to the CPSRA Preliminary General Plan and Draft Program EIR that clarify the new park acreage that would be provided by the Candlestick Point-Hunters Point Shipyard Phase II Project.

4-4. Section 26 of SB 792 requires that as part of the reconfiguration of CPSRA, the state will receive consideration that equals or exceeds the greater of either "…[t]he fair market value of the state property conveyed [or[[f]ifty million dollars." The statute is explicit that the fifty-million dollar figure "is not intended to be reflective of the fair market value of the property." As explained in the Park Reconfiguration Agreement itself, "[a]n appraisal of the Project site, including the [land to be removed from CPSRA], entitled "Appraisal Report, Hunters Point Shipyard/ Candlestick Point Redevelopment Project Site, San Francisco, California," and dated April 2010, was prepared by an independent appraiser and was reviewed and approved by the Real Estate Services Division of the Department of General Services ("DGS"). An update of the appraisal, dated October, 2010, was subsequently reviewed and approved by DGS. Based on the appraisal, the fair market value of the [land to be removed from CPSRA] is substantially below $50,000,000.00." Therefore, the Agreement provides for total consideration of fifty million dollars. Again, the Agreement provides in paragraph 9 that the consideration "is not intended to be reflective of the fair market value of the property."

Moreover, of the 50 million dollar consideration, 10 million is committed to the operations and maintenance of CPSRA and, per paragraph 14 of the Agreement, will be deposited in an "investment account selected to provide a reasonable return on investment, consistent with prudent investment practice and subject to the requirements of state law." It is, in other words, an endowment. The remaining 40 million dollars will fund park improvements. The quoted sentence will be revised to clarify that the endowment will fund operations and maintenance:

In response to this comment, the third paragraph on page 1-10 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as follows:

> The process of updating CPSRA's General Plan began in early 2010, to respond to the adjacent proposed Candlestick Point-Hunters Point Shipyard Phase II Project. The project will dramatically alter the neighborhood surrounding the park, replacing the existing Candlestick Park stadium, vacant lands and other areas with a large, mixed-use development. This

> redevelopment project will change the relationship of the park with the surrounding neighborhood and is expected to both increase visitation and change the types of visitors. In addition, State Parks entered into a land exchange with the City of San Francisco that reconfigured the park boundary—adding land in some of the narrowest areas and removing it from others. In exchange, CPSRA will receive~~d~~ a~~n~~ $10 million endowment to support the park's operations and maintenance and $40 million to fund improvements to the park over the long-term. This General Plan amendment responds to the external pressures on CPSRA and sets forth a vision that is consistent with the park's mission while also adapting to large forces of change.

The commenter's claims and proposed revision regarding the nature of the consideration, however, is inaccurate for the reasons given above.

4-5. The San Francisco Redevelopment Agency and the Brisbane Redevelopment Agency, along with all 400 redevelopment agencies in California, were dissolved on February 1, 2012, pursuant to Assembly Bill No. X1 26 and the subsequent decision of the California Supreme Court issued on December 29, 2011 (California Redevelopment Association et al. v. Ana Matosantos). Except for the Candlestick Point-Hunters Point Shipyard Phase II Project, other redevelopment projects in the vicinity of CPSRA are no longer supported by the City. The commenter is correct in noting that pursuant to development proposals in the Visitacion Valley Redevelopment Project area described on page 1-4 of the CPSRA Preliminary General Plan and Draft Program EIR, along with the Executive Park Project and Baylands Project in the City of Brisbane no longer have access to Redevelopment funding to finance these major projects.

In response to this comment, the second, third, and fourth paragraphs on page 1-4 of the CPSRA Preliminary General Plan and Draft Program EIR have been revised as follows:

> Assembly Bill No. X1 26, and the subsequent decision of the California Supreme Court in its decision issued on December 29, 2011 (California Redevelopment Association et al. v. Ana Matosantos), dissolved Redevelopment Agencies statewide, impacting several redevelopment projects that are planned in the vicinity of CPSRA. These projects—including Executive Park, Visitacion Valley Redevelopment Project, and The Baylands—are described in the following paragraphs.~~a large office park comprising 71 acres bounded by Harney Way and US-101, is directly north of the westernmost portion of CPSRA. Redevelopment of this area will transform Executive Park from a site with an office park and small amount of gated housing to a new~~

Executive park is a proposed mixed-use neighborhood with 2,800 residential units, a town center, and connections to the nearby waterfront, open spaces, and commercial districts.

The Visitacion Valley Redevelopment Project is a proposed~~comprises 46 acres in San Francisco's Visitacion Valley neighborhood, less than one-half mile west of the CPSRA. The area targeted for redevelopment includes the 20-acre industrial brownfield formerly occupied by the Schlage Lock Company factory, properties fronting Bayshore Boulevard, and the Leland Avenue commercial corridor (SFRA and SFPD 2009, SFRA 2009b). The project includes the creation of a new,~~ transit-oriented, and pedestrian-friendly mixed-use development with up to 1,250 new housing units, 90,000 square feet of retail, three new parks, and a new community center. The Visitacion Valley Redevelopment Project no longer has access to San Francisco Redevelopment financing. The project is on hold until other sources of funding are identified to the project to move forward.

The Baylands~~,~~ is a 660-acre former rail yard and landfill in the City of Brisbane that is being considered for redevelopment (Brisbane 2009)~~,~~ and no longer has access to Brisbane Redevelopment financing. ~~is located directly south of CPSRA. The City of Brisbane is currently considering alternatives for the redevelopment of about 300 acres in the Baylands eastern portion, as part of the environmental review process. Future uses could include trails, enhanced open spaces, and sustainable development (Brisbane 2009).~~ The City of Brisbane is proceeding with the Baylands project, and has scheduled publication of the Draft EIR for the project in summer 2012.

These projects no longer have access to redevelopment financing. To the extent that these projects depended on redevelopment financing, they are on hold until other sources of public or private financing are identified to enable these projects to move forward.

4-6. Figure 3-1, Parks and Open Space, on page 3-4 of the CPSRA Preliminary General Plan and Draft Program EIR, has been revised to utilize the conceptual plan for Non-Stadium Option 2 (NS-2) from the Parks, Open Space, and Habitat Concept Plan, Candlestick Point and Hunters Point Shipyard Phase I. The revised map is provided on the following page.

CANDLESTICK POINT STATE RECREATION AREA

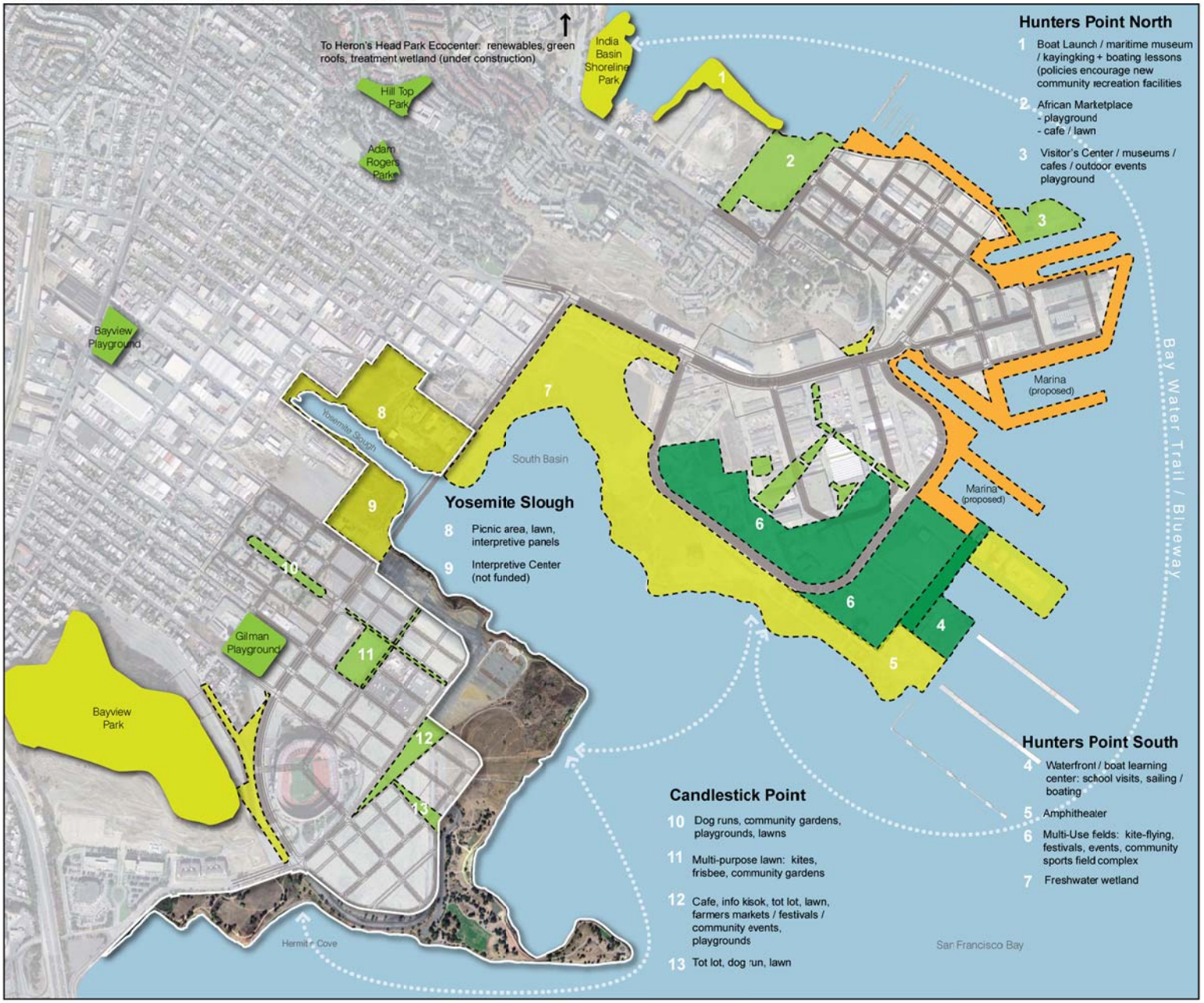

Figure 3-1

Opportunities + Constraints

PARKS + OPEN SPACE

EXISTING

- Restoration / Ecological Park
- Neighborhoood Park

PROPOSED

- Restoration / Ecological Park
- Neighborhoood Park
- Sports Field / Recreation
- Promenade

0 500 1,000 2,000 Feet

04.24.2012

AECOM

4-7. State Parks agrees with the commenter's statement that the CPSRA Preliminary General Plan and Draft Program EIR is a program-level EIR that does not provide sufficient detail to be considered a project-level EIR. Page 1-11 of the CPSRA Preliminary General Plan and Draft Program EIR describes the document as a first-tier, program-level EIR. State Parks prefers to retain the full discussion presented in Section 1.5.1, Combined General Plan/EIR Tiering, because it explains to the reader that this document is a first-tier, program-level EIR, it explains that future actions implemented under the General Plan may need additional environmental review, and it explains how the document incorporates information from the Candlestick Point-Hunters Point Shipyard Phase II Project EIR.

4-8. As noted by the commenter, CPSRA occupies a portion of the Yosemite Basin watershed. Preparation of a management plan for the entire watershed would go beyond the jurisdiction of State Parks and is not required as part of the CPSRA General Plan.

4-9. The CPSRA Preliminary General Plan and Draft Program EIR includes the following guidelines that promote improved connectivity between vegetation communities within the park:

Guideline Wildlife-2: Maximize connectivity between vegetation communities, such as the grassland/coastal shrub and coastal native planning zones, to facilitate the movement of wildlife throughout the park. Provide transition zones between vegetation communities. Where possible, facilitate connections to other parks and open space areas in the region, such as Bayview Hill.

Guideline Grassland/Coastal Shrub-1: Maximize the connectivity of Grassland/Coastal Shrub Zone across different geographic areas of CPSRA to preserve and enhance wildlife migration corridors and other important ecological functions.

While State Parks supports maximizing connectivity between habitat areas within CPSRA, it does not manage the lands beyond the park boundary that extend to Hunters Point Shipyard and Islais Creek. Habitat types within Yosemite Slough link to those planned at Hunters Point Shipyard.

4-10. The statistics presented in the Environmental Justice discussion on page 3-16 of the CPSRA Preliminary General Plan and Draft Program EIR were obtained from the Literacy for Environmental Justice website, and differ from the statistics included in Section 2.7, Demographics (see pages 2-90 to 2-94).

In response to this comment and to provide consistent demographic information throughout the document, the third paragraph in Section 3.2.4, Community

Resources, on page 3-16 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as follows:

> *Environmental Justice*
>
> Bayview Hunters Point is predominantly a low-income community of color which has historically served as the dumping ground for San Francisco's most toxic industries. Thirty-four~~Fifty~~ percent of community residents are African-American, ~~twenty~~thirty-five percent are Asian-Pacific Islander, fourteen~~fifteen~~ percent are Latino, and twenty-two~~ten~~ percent are white (SFDPH 2009d). Twenty-one~~More than fifty~~ percent of the neighborhood's population was living below the poverty level in 2000~~area households are considered low or very low income~~ (SFDPH 2009e~~Literacy for Environmental Justice, 2011~~).

4-11. Please see the response to Comment 3-12 of the Golden Gate Audubon Society letter.

4-12. State Parks notes the commenter's opinion that there would be numerous and specific benefits associated with changes or the loss of the Candlestick Point-Hunters Point Shipyard Phase II Project. As noted above, however, in the absence of that Project, State Parks would implement Alternative 2, which would provide fewer improvements and less funding for CPSRA than the Preferred Alternative. As described in Section 5.8.2, on pages 5-65 through 5-68 of the CPSRA Preliminary General Plan and Draft Program EIR, Alternative 2 would focus on cultural, interpretive/educational and community resources, and would have many benefits of the Preferred Alternative as well as other benefits, such as a sculpture garden in the Heart of the Park and art pieces along trails. In addition, Alternative 2 would likely result in fewer construction-related impacts (e.g., traffic, air quality, and noise impacts) than the Preferred Alternative, because fewer new facilities would be constructed over the lifetime of the General Plan.

While Alternative 2 would potentially offer many benefits, the lack of funding associated with the land exchange proposed under the Preferred Alternative, coupled with State Parks' current funding constraints, may hinder implementation of those improvements included in Alternative 2. The funding that would be provided as part of the land exchange between State Parks and the City and County of San Francisco, which includes $40 million for park development and $10 million for operations and maintenance, would result in more improvements to the park and would help to achieve the goals of the Preliminary General Plan. Thus, Alternative 2 offers fewer improvements and less certainty than the Preferred Alternative.

Please see the response to Comment 3-11 of the Golden Gate Audubon Society letter for a discussion of the changes to the CPSRA boundary.

The commenter notes that $14 million was raised to fund the Yosemite Slough Restoration Project, and there has been a market in local philanthropy for funding park improvements. However, a percentage of the Foundation money came from mitigation funds from large-scale projects—such as expansions at the San Francisco Airport and the extension of the BART line—that are unique and not likely to be seen again for some time. It is not accurate to portray this as philanthropy. While State Parks is very appreciative of any funding received from partners and donors, the $50 million that would be provided as part of the land exchange between State Parks and the City and County of San Francisco is much more than State Parks could likely raise from outside sources for a single park. The funding from the land exchange is likely the only means by which State Parks can implement many of the improvements proposed in the Preliminary General Plan and achieve the goals identified in the Plan.

Costanoan Rumsen Carmel Tribe of Ohlone

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5

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Chairman

Gloria Castro
Vice-Chair

Emily Correa
Secretary

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Treasurer

Steven Cesena
Sargent of Arms

Francine Chacon
Council Member

Rosie Parra Ybarra
Council Member

Michael Oliva
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Juan Casados
Council Member

Aurora Corona
Council Member

Michael Rodriguez
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Sam Rodriguez
Council Member

Ray Ontiveros
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Bob Burton
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Public Relations
Neil Maclean

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Gloria McLeod
California State Assemblywoman

Jose Morales
Publisher Vista America News

Joan Wilson
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Dr. Bob Gaines
Chair. California Black Chamber of Commerce

Brigadier General Michael J. Teilmann
Director Bob Hope U.S.O.

Michael Suarez
President Pomona Latino Chamber

Patty Barham
Hollywood Socialite LA Examiner

Dr. William Welsh, D.O.

Comments on the Preliminary General Plan and the Draft EIR for Candlestick Point State Recreation Area
From the Ohlone Profiles Project and the Costanoan Rumsen Carmel Tribe of Ohlone

We appreciate the attention that the Candlestick State Park gives to Ohlone pre-history in the Draft Program EIR that the Park has published.

We want to encourage the Park to plan for the future of Ohlone culture in San Francisco. Yosemite Slough and the shoreline development between Hunter's and Candlestick Points are the last remaining shoreline in San Francisco that have any chance of supporting Ohlone culture in anything like a traditional environment. The Park will be an ideal location for an outdoor ceremonial arbor, where the tribe will be able to host Big Time Gatherings, seasonal festivals and outdoor ceremonies. 5-1

As your plan indicates, the Ohlone used the Yosemite basin and shoreline extensively in pre-history. As your report also indicates, "Ohlone individuals are gaining economic and political influence not available to them for over 200 years. Many Ohlone are actively engaged in maintaining their cultural traditions and serving as advocates for issues concerning native American peoples throughout the Bay Area and California."

What your report misses is the existence of a viable Ohlone tribe, the Costanoan Rumsen Carmel Tribe of Ohlone. The tribe includes a fifty person dance and song group, (the Humaya (Hummingbird) Singers and Dancers. The tribe demonstrates key features of all California tribes: it initiates new members annually employing ceremonies recognized by other Northern California tribes. It conducts regular sweat lodges. It elects its leadership and has an active board. The tribe includes 2,000 members who trace ancestry to both the Mission Dolores and to an ancient Ohlone village near Carmel the village of Echilat, now known as San Francisco Flats.

5-2

During the last few years a small group of San Franciscans, led by Native American community members, have initiated a process to re-engage the Costanoan Rumsen Carmel tribe with the city. We call ourselves the Ohlone Profiles Project or OPP. By obtaining support from the SF Arts Commission the OPP has brought the tribe to a series of ceremonies at Ohlone sacred sites in San Francisco. The OPP has also brought the tribe to the Board of Supervisors (who voted unanimously to support an Ohlone led Native American cultural center in San Francisco.) We have also introduced the tribe to the mayor and to the City Planning Department and Redevelopment Agency. The mayor honored the tribe with a city declaration and the tribe performed its dances at city hall. (On August 10th, 2010, the State Park was kind enough to host a sunrise ceremony of the tribe at Yosemite Slough.)

Costanoan Rumsen
Carmel Tribe of Ohlone

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Hollywood Socialite LA Examiner

Dr. William Welsh, D.O.

The Ohlone Profiles Project has support from the Arts Commission to bring the tribe to the city for cultural presentations but has very limited ability to engage in the planning process and integrate the tribe into what is unfolding as the Shoreline Development. It is encouraging that the Ohlone Profiles Project has just secured money to hire an architect and strategic planner with the intention of creating introductory documents and a process for including the community in the Ohlone renewal process.

The Ohlone Profiles Project has identified important goals of the tribe, and of native Americans community members residing in San Francisco. Foremost is the need to develop a Native American cultural center. The center would provide a museum and research library. It will also have access to a conference area where Ohlone will be able to meet with indigenous visitors from around the world. The center will become a source of renewal for Ohlone culture and for Native Americans who reside in or travel to San Francisco.

We have not selected the site for this cultural center but we think the Hunter's Point Shipyard is a likely area.

5-3

We are looking to the Candlestick State Park to offer an outdoor arena where the tribe could dance and could host Big Time Gatherings of Native Peoples from California. We think the "undeveloped" area north of Yosemite Slough is likely to be a good area for the outdoor dance arbor. We note that your plans already include a public area for picnics, and perhaps a small amphitheater at nearly the right spot for an Ohlone dance arena. We hope you will be open to modifying this area to include Ohlone interests.

Last June, presented by the Ohlone Profiles Project, the tribe hosted the first Ohlone Big Time in San Francisco history at the Yerba Buena Garden. Four Northern California tribes came to the city to honor the Ohlone: Shingles Springs Rancheria, Pitt River Maidu, Elem Indian Colony Pomo, and Manchester Point Arena Pomo. (You can see some of the documents of these events at ohloneprofiles.org.) These tribes are each federally recognized and each have an ongoing interest in presenting their cultures in San Francisco. They are hoping to support the Costanoan Rumsen Carmel Tribe's renewal..

We look forward to sharing these plans with you and hope you are excited at this chance to support the indigenous people in San Francisco as well.

Neil MacLean,
Mary Jean Robertson
Co-directors of Ohlone Profiles Project
Tony Cerda,
Chief Costanoan Rumsen Carmel Tribe

Comment Letter 5 – Costanoan Rumsen Carmel Tribe of Ohlone

5-1. State Parks acknowledges the heritage of the Ohlone (Costanoan) people at Candlestick Point and the role the tribe has played in growing the recognition of Ohlone culture in the San Francisco Bay area. The CPSRA General Plan encourages culturally based activities, and the use of facilities which support and are compatible with the tribe's and the Ohlone Profiles Project's goal to re-engage the Costanoan Rumsen Carmel tribe. State Parks invites the Costanoan Rumsen Carmel tribe to continue to stay in contact with the supervising ranger of CPSRA to make arrangements for Special Events at the park.

5-2. Information about the Costanoan Rumsen Carmel Tribe of Ohlone has been added to the CPSRA Preliminary General Plan and Draft Program EIR in response to this comment. The following text has been added to page 2-33 of the CPSRA Preliminary General Plan and Draft Program EIR, directly preceding the Local Archaeological Investigations and Sites discussion:

> The Costanoan Rumsen Carmel Tribe of Ohlone includes 2,000 members who trace ancestry to both Mission Dolores and to an ancient Ohlone village near Carmel, the village of Echilat, now known as San Francisco Flats. The tribe demonstrates key features of all California tribes: it initiates new members annually employing ceremonies recognized by other Northern California tribes, conducts regular sweat lodges, and elects its leadership and has an active board. The tribe includes a fifty person dance and song group, the Humaya (Hummingbird) Singers and Dancers.
>
> During the last few years, a small group of San Franciscans called the Ohlone Profiles Project has initiated a process to re-engage the Costanoan Rumsen Carmel Tribe of Ohlone with the City of San Francisco. By obtaining support from the San Francisco Arts Commission, the Ohlone Profiles Project has brought the tribe to a series of ceremonies at Ohlone sacred sites in San Francisco. The Ohlone Profiles Project has also brought the tribe to the San Francisco Board of Supervisors, who voted unanimously to support an Ohlone-led Native American cultural center in San Francisco, as well as to the mayor and the City Planning Department and Redevelopment Agency. The mayor honored the tribe with a city declaration and the tribe performed its dances at City Hall. On August 10, 2010, the tribe held a sunrise ceremony at Yosemite Slough.

In addition, the following text has been added to the third paragraph on page 1-17 of the CPSRA Preliminary General Plan and Draft Program EIR:

> By the latter decades of the 20th century, however, the Ohlone people began a period of cultural revitalization based on family ties and affiliations with the rancherias (small “reservations”) established during the Mexican and American periods (Albion Environmental 2001). Some of the Ohlone bands have received federal recognition and are increasingly organized, exerting an economic and political influence not available to them for over 200 years. This has enabled a renewed focus on their ancestral heritage, and today many Ohlone are actively engaged in maintaining their cultural traditions and serving as advocates for issues concerning Native American peoples throughout the Bay Area and California. The Costanoan Rumsen Carmel Tribe of Ohlone, a 2,000-member tribe in Northern California, has recently held a series of ceremonies at Ohlone sacred sites in San Francisco. The tribe held a sunrise ceremony at Yosemite Slough in August 2010. Further information on this tribe is presented in Section 2.1.3, Cultural Resources.

5-3. Please see the response to Comment 5-1 of the Costanoan Rumsen Carmel Tribe of Ohlone letter.

4 Recommended Changes to the General Plan and EIR

This chapter contains recommended revisions to the CPSRA Preliminary General Plan and Draft Program EIR made subsequent to its public release and the public review process. Revisions are the result of responses to comments presented in Chapter 3 of this document. Text revisions are organized by section and page numbers that appear in the Preliminary General Plan and Draft Program EIR. Revisions to text are shown with a strikethrough or underline. Text that has a ~~strikethrough~~ has been deleted from the Preliminary General Plan and Draft Program EIR. Text that has been added is single underlined. The Final General Plan may include additional minor revisions to ensure accuracy of information presented in the plan.

4.1 EXECUTIVE SUMMARY REVISIONS

The following guideline has been added to Table S-1: Summary of Potential Impacts Resulting from the CPSRA Draft General Plan Preferred Alternative, under the UTIL-1, Increase Demand on Utilities and Service Systems Impact Section, beginning on page S-22 of the CPSRA Preliminary General Plan and Draft Program EIR:

Guideline Wildlife-4: Reduce and work toward elimination of wildlife access to human food and garbage by using wildlife-proof trash containers and dumpsters throughout the park, increasing the frequency of trash collection, and educating the public about the detrimental effects of human food on the ecological balance. Post signs throughout the

park informing people not to feed wildlife and to cover and store food and trash appropriately

4.2 CHAPTER 1 REVISIONS

The following revisions have been made to the second paragraph on page 1-1 of the CPSRA Preliminary General Plan and Draft Program EIR:

As shown in Figure 1-2, the Bayview Hunters Point community borders CPSRA to the north and west, and the surroundings are primarily industrial. The South Basin industrial area, which surrounds Yosemite Slough and extends west to US-101, contains a variety of small-scale industrial uses, such as auto repair shops, food distributors, bulk warehouses, and recycling facilities. Light industrial uses such as metal fabrication and distribution facilities are located north of Carroll Avenue. West of Hawes Street and west and south of Candlestick Park, the predominant land use is single-family residential. Within the~~is~~ Bayview Hunters Point community are the Candlestick Point and Hunters Point Shipyard sites, which are located west of and northeast of CPSRA, respectively, and comprise over 700 acres along San Francisco's southeastern waterfront. Redevelopment of this area will create over 10,500 residential units, approximately 700,000 square feet of destination retail and entertainment space, over 2.5 million square feet of commercial space oriented around a green science and technology campus, and ~~more than 300~~approximately 240 acres of new waterfront parks. The project contains several phases: the Hunters Point Shipyard Phase 1 development is currently underway to construct 1,600 homes and 25 acres of open space. The remainder of the development will occur as part of the Candlestick Point-Hunters Point Phase II Project, with full build-out expected by 2020.

Figure 1-1, Regional Location, on page 1-2 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as shown on the following page.

The following revisions have been made to the first paragraph on page 1-4 of the CPSRA Preliminary General Plan and Draft Program EIR:

This second phase contains the Candlestick Point subcomponent, a 281-acre area that includes 120 acres of CPSRA as well as Candlestick Park stadium (home to the San Francisco 49ers football team) and the Alice Griffith public housing site, which are located immediately west of CPSRA. Plans for Candlestick Point include the creation of 7,850 residential units, 760,000 square feet of retail, 150,000 square feet each of office and hotel space, and approximately 7 acres of new parkland, as well as improvements within CPSRA. ~~over 104 acres of new and improved parkland, approximately 97 acres of which is CPSRA land~~ (SFRA and SFPD 2009).

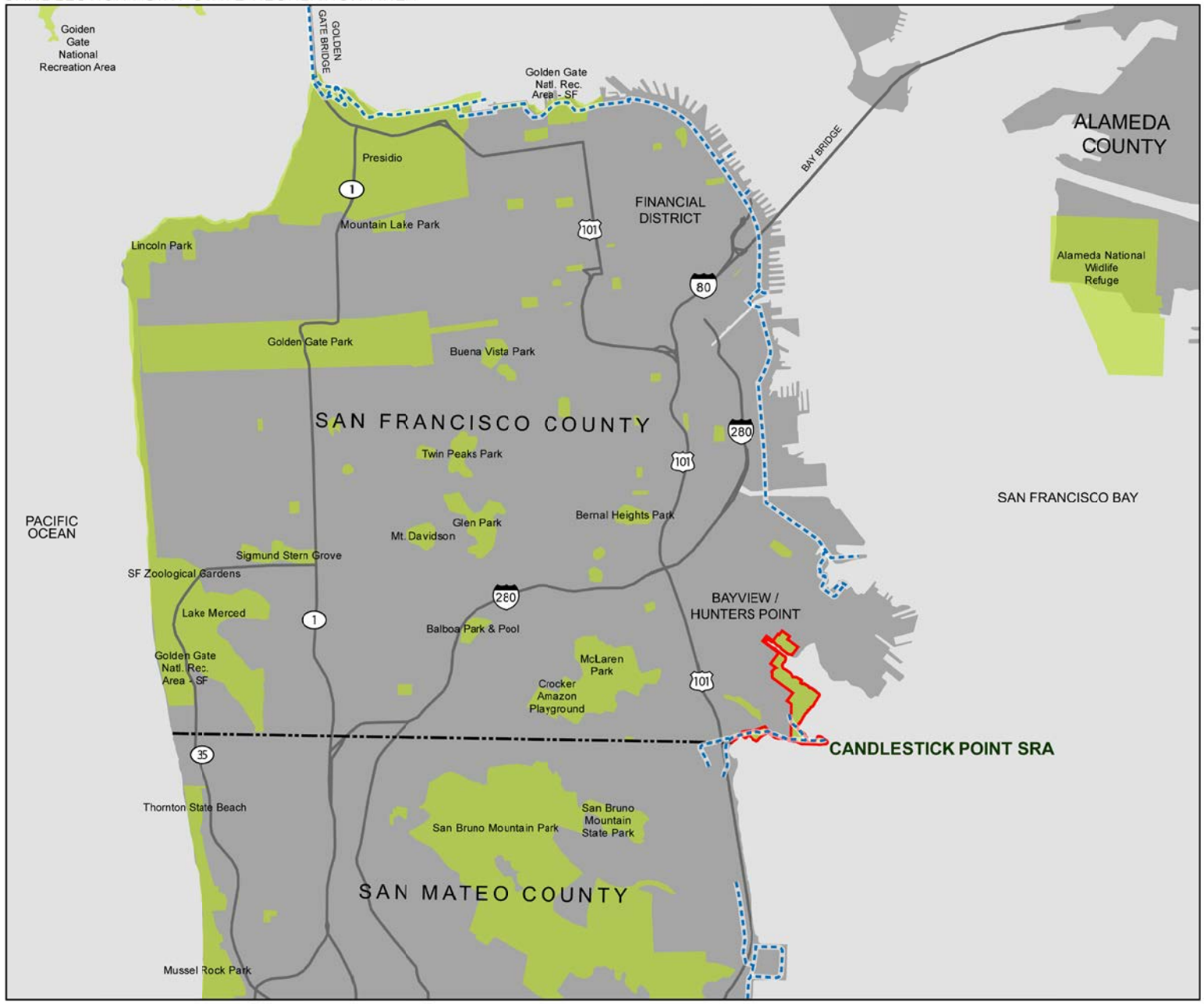


Figure 1-1
REGIONAL LOCATION

- Candlestick Point SRA Boundary (current)
- Major parks / open spaces
- Major roads
- Bay Trail

Extents of Main Map

0 2,750 5,500 11,000 Feet

Source: San Francisco Planning Department
04.10.12

AECOM

The following revisions have been made to the second, third, and fourth paragraphs on page 1-4 of the CPSRA Preliminary General Plan and Draft Program EIR:

Assembly Bill No. X1 26, and the subsequent decision of the California Supreme Court in its decision issued on December 29, 2011 (California Redevelopment Association et al. v. Ana Matosantos), dissolved Redevelopment Agencies statewide, impacting several redevelopment projects that are planned in the vicinity of CPSRA. These projects—including Executive Park, Visitacion Valley Redevelopment Project, and The Baylands—are described in the following paragraphs.~~a large office park comprising 71 acres bounded by Harney Way and US-101, is directly north of the westernmost portion of CPSRA. Redevelopment of this area will transform Executive Park from a site with an office park and small amount of gated housing to a new~~

Executive park is a proposed mixed-use neighborhood with 2,800 residential units, a town center, and connections to the nearby waterfront, open spaces, and commercial districts.

The Visitacion Valley Redevelopment Project is a proposed~~comprises 46 acres in San Francisco's Visitacion Valley neighborhood, less than one-half mile west of the CPSRA. The area targeted for redevelopment includes the 20-acre industrial brownfield formerly occupied by the Schlage Lock Company factory, properties fronting Bayshore Boulevard, and the Leland Avenue commercial corridor (SFRA and SFPD 2009, SFRA 2009b). The project includes the creation of a new,~~ transit-oriented, and pedestrian-friendly mixed-use development with up to 1,250 new housing units, 90,000 square feet of retail, three new parks, and a new community center. The Visitacion Valley Redevelopment Project no longer has access to San Francisco Redevelopment financing. The project is on hold until other sources of funding are identified to the project to move forward.

The Baylands~~,~~ is a 660-acre former rail yard and landfill in the City of Brisbane that is being considered for redevelopment (Brisbane 2009)~~,~~ and no longer has access to Brisbane Redevelopment financing. ~~is located directly south of CPSRA. The City of Brisbane is currently considering alternatives for the redevelopment of about 300 acres in the Baylands eastern portion, as part of the environmental review process. Future uses could include trails, enhanced open spaces, and sustainable development (Brisbane 2009).~~ The City of Brisbane is proceeding with the Baylands project, and has scheduled publication of the Draft EIR for the project in summer 2012.

These projects no longer have access to redevelopment financing. To the extent that these projects depended on redevelopment financing, they are on hold until other sources of public or private financing are identified to enable these projects to move forward.

The following revisions have been made to Section 1.2.2, Existing Features and Land Uses Within the Park, on page 1-5 of the CPSRA Preliminary General Plan and Draft Program EIR:

1.2.2 Existing Features and Land Uses within the Park

The shoreline of CPSRA is perhaps its most defining feature, particularly considering the park's urban surroundings. Long-range scenic views of San Francisco Bay are available from viewpoints throughout the park. Passive recreation is the focus of the park, and development is concentrated in areas that provide the greatest shoreline access, primarily south of the main park entrance. Activities include windsurfing, fishing, beach use, picnicking, walking, wildlife viewing, birding, and a variety of uses on the existing three miles of nonmotorized trails (State Parks 2009a). The San Francisco Bay Trail, a regional trail that will circle the Bay when completed, follows the CPSRA shoreline from the San Mateo County line to Sunrise Point (The Point), and then continues through the Main Park (Heart of the Park) to Donohue Avenue. Figure 1-3 illustrates the existing conditions within CPSRA.

The following revisions have been made to the third paragraph on page 1-10 of the CPSRA Preliminary General Plan and Draft Program EIR:

The process of updating CPSRA's General Plan began in early 2010, to respond to the adjacent proposed Candlestick Point-Hunters Point Shipyard Phase II Project. The project will dramatically alter the neighborhood surrounding the park, replacing the existing Candlestick Park stadium, vacant lands and other areas with a large, mixed-use development. This redevelopment project will change the relationship of the park with the surrounding neighborhood and is expected to both increase visitation and change the types of visitors. In addition, State Parks entered into a land exchange with the City of San Francisco that reconfigured the park boundary—adding land in some of the narrowest areas and removing it from others. In exchange, CPSRA will receive~~d~~ a~~n~~ $10 million endowment to support the park's operations and maintenance and $40 million to fund improvements to the park over the long-term. This General Plan amendment responds to the external pressures on CPSRA and sets forth a vision that is consistent with the park's mission while also adapting to large forces of change.

The following text has been added to the third paragraph on page 1-17 of the CPSRA Preliminary General Plan and Draft Program EIR:

By the latter decades of the 20th century, however, the Ohlone people began a period of cultural revitalization based on family ties and affiliations with the rancherias (small "reservations") established during the Mexican and American periods (Albion Environmental 2001). Some of the Ohlone bands have received federal recognition and

are increasingly organized, exerting an economic and political influence not available to them for over 200 years. This has enabled a renewed focus on their ancestral heritage, and today many Ohlone are actively engaged in maintaining their cultural traditions and serving as advocates for issues concerning Native American peoples throughout the Bay Area and California. The Costanoan Rumsen Carmel Tribe of Ohlone, a 2,000-member tribe in Northern California, has recently held a series of ceremonies at Ohlone sacred sites in San Francisco. The tribe held a sunrise ceremony at Yosemite Slough in August 2010. Further information on this tribe is presented in Section 2.1.3, Cultural Resources.

4.3 CHAPTER 2 REVISIONS

The following text has been added to page 2-33 of the CPSRA Preliminary General Plan and Draft Program EIR, directly preceding the Local Archaeological Investigations and Sites discussion:

The Costanoan Rumsen Carmel Tribe of Ohlone includes 2,000 members who trace ancestry to both Mission Dolores and to an ancient Ohlone village near Carmel, the village of Echilat, now known as San Francisco Flats. The tribe demonstrates key features of all California tribes: it initiates new members annually employing ceremonies recognized by other Northern California tribes, conducts regular sweat lodges, and elects its leadership and has an active board. The tribe includes a fifty person dance and song group, the Humaya (Hummingbird) Singers and Dancers.

During the last few years, a small group of San Franciscans called the Ohlone Profiles Project has initiated a process to re-engage the Costanoan Rumsen Carmel Tribe of Ohlone with the City of San Francisco. By obtaining support from the San Francisco Arts Commission, the Ohlone Profiles Project has brought the tribe to a series of ceremonies at Ohlone sacred sites in San Francisco. The Ohlone Profiles Project has also brought the tribe to the San Francisco Board of Supervisors, who voted unanimously to support an Ohlone-led Native American cultural center in San Francisco, as well as to the mayor and the City Planning Department and Redevelopment Agency. The mayor honored the tribe with a city declaration and the tribe performed its dances at City Hall. On August 10, 2010, the tribe held a sunrise ceremony at Yosemite Slough.

The following revisions have been made to page 2-50 of the CPSRA Preliminary General Plan and Draft Program EIR:

Yosemite Slough

Yosemite Slough, at the northern end of CPSRA, is largely inaccessible due to fencing and surrounding industrial land uses, although visitors may enter the area on foot from the unimproved area to the southeast. Plans are underway for ecological restoration, soil remediation, and recreation via the Yosemite Slough Restoration Project. The project includes the development of new trails, vehicle access points, parking areas, picnic areas, lawn areas, an interpretive area that could include an enclosed structure or an outdoor pavilion, ~~center~~ and educational displays. The area of CPSRA east of Yosemite Slough contained four buildings formerly used as warehouses. These buildings were demolished with the Yosemite Slough Phase I project. Public access is restricted to this area of Yosemite Slough.

The following revisions have been made to the San Francisco Bay Trail discussion on page 2-71 of the CPSRA Preliminary General Plan and Draft Program EIR:

San Francisco Bay Trail

The San Francisco Bay Trail is designed to create recreational pathway links to the various commercial, industrial, and residential neighborhoods that surround San Francisco Bay. In addition, the trail connects points of historic, natural, and cultural interest; recreational areas such as beaches, marinas, fishing piers, boat launches, and over 130 parks and wildlife preserves, totaling 57,000 acres of open space. At various locations, the Bay Trail consists of paved multi-use paths, dirt trails, Class II bike lanes, and sidewalks~~, or city streets signed as bike routes~~. Within the CPSRA vicinity, the Bay Trail has a discontinuous segment of existing, off-street pathway in the area of Candlestick Point and Harney Way. ~~The Bay Trail currently bridges the gap between Islais Creek and Candlestick Point with an inland route that shares portions of Gilman Avenue, Arelious Walker Drive, Carroll Avenue, Ingalls Street, Yosemite Avenue, and Third Street.~~ An unimproved, on-street segment of the Bay Trail extends from Harney Way west of CPSRA, under U.S. 101 to Sierra Point Parkway, near the intersection with Beatty Road. ~~exists in the southern part of CPSRA where public access improvements have been made, but the northern section is unimproved. The trail starts northeast of the US-101 northbound Harney Way ramps.~~

The following text has been added to the Candlestick Point Design for Development discussion on page 2-82 of the CPSRA Preliminary General Plan and Draft Program EIR:

Candlestick Point Design for Development

The *Candlestick Point Design for Development* (San Francisco Redevelopment Agency 2010) identifies CPSRA as a unique opportunity to create a model urban recreation

area that links city residents and regional visitors to the diversity of estuary and upland habitats of the Bay. This document also identifies principles for the design process, which include:

- Design city parks and state recreation areas to feel, from a user perspective, as one park system despite potential programmatic and operational differences between jurisdictions.
- Develop a park that is programmed and designed for safe and active 18–24 hour daily use by the public.
- Design a pedestrian- and bike-accessible transition zone between all private development parcels and the park.
- Develop frequent routes into the park from the neighborhood, aligning with the planned street network with major linkages with transit stops, bike routes, and linear greenway features.
- Create a mixture of passive and active spaces that activate the open space, drawing neighbors and visitors to the waterfront.
- Provide duplicative trail systems, including linkage to a Class One Bike Trail and multi-use recreation trail close to neighborhoods, a continuous Bay Trail close to the water, and multiple linkages between.
- Install multiple human-powered boat access points, including facilities for windsurfers south of Bayview Hill and kayak/canoe facilities near Jackrabbit Beach.
- Preserve and expand the existing pocket beach.
- Utilize sustainable design principles through park planning to expand the ecological functions of the recreation area and minimize resource consumption by park facilities, programs, and users.
- Introduce limited commercial uses to provide food and recreational services for visitors.
- Balance dedicated parking facilities for the recreation area with available on- and off-street parking provided in the neighboring development, and transit access to the area.

- Upgrade existing and install additional fishing and viewing piers into the bay.
- Provide multiple day use facilities to accommodate family and social gathering in multiple areas of the park, and consider larger scaled gathering opportunities for events.

The following revisions have been made to the Candlestick Point-Hunters Point Shipyard Development discussion on page 2-85 of the CPSRA Preliminary General Plan and Draft Program EIR:

The Candlestick Point-Hunters Point Shipyard Development Project

Together, the Candlestick Point and Hunters Point Shipyard sites comprise over 700 acres along San Francisco's southeastern waterfront (SFOEWD 2009). Redevelopment of the area stems from the *Bayview Hunters Point Redevelopment Plan*, which focuses on generating economic development, affordable housing, and community enhancements (SFRA 2009a). The new development will create over 10,500 residential units, approximately 700,000 square feet of destination retail and entertainment space, over 2.5 million square feet of commercial space oriented around a green science and technology campus, and ~~more than 300~~approximately 240 acres of new waterfront parks. The project contains several phases: the Hunters Point Shipyard Phase I development is currently underway to construct 1,600 homes and 25 acres of open space. The remainder of the development will occur as part of the Candlestick Point-Hunters Point Phase II Project, with full build-out expected by 2020. This second phase contains the Candlestick Point subcomponent, a 281-acre area that includes 120 acres of CPSRA, Candlestick Park stadium, and the Alice Griffith public housing site. Plans for Candlestick Point include the creation of 7,850 residential units, 760,000 square feet of retail, 150,000 square feet each of office and hotel space, and approximately 7 acres of new parkland, as well as improvements within CPSRA. ~~over 104 acres of new and improved parkland, approximately 97 acres of which is CPSRA land~~ (SFRA and SFPD 2009).

The following text has been added to Section 2.7.1, Recreation Trends, on page 2-90 of the Preliminary General Plan and Draft Program EIR:

2.7.1 Recreation Trends

Numerous recreation studies have been conducted in recent years with the goal of creating a profile of California's outdoor recreationists. A 2009 study, The Complete Findings, Survey on Public Opinions and Attitudes on Outdoor Recreation in California (State Parks 2009g), found the five most popular outdoor recreation activities for adults in the San Francisco Bay Area to be walking for fitness or pleasure; picnicking in picnic areas; driving for pleasure or sightseeing; visiting outdoor nature museums, zoos,

gardens or arboretums; and beach activities. Among the Bay Area's youth, the top five preferred activities were playing, sports, jogging/running, walking, and bicycling (State Parks 2009g).

The Recreation Assessment Summary Report, prepared for the San Francisco Recreation and Park Department in 2004, evaluated the recreational needs of residents and identified key recreational issues that the community felt needed to be addressed. In a survey conducted for the Recreation Assessment, San Francisco residents ranked walking and biking trails as the top priority for recreational facilities. The recreational activities that the highest percentage of respondent households participates in include: running or walking (67%) and visiting nature areas (61%). Running or walking (28%) had the highest percentage of respondents select it as one of the four recreational activities they would participate in more often if more programming were made available by the City. There are five other activities that at least 20% of respondents selected as one of the four they would most participate in more often, including: visiting nature areas (24%); attending live theater/concert performances (24%); adult fitness/aerobics classes (22%); and recreational swimming/swim lessons (20%).

4.4 CHAPTER 3 REVISIONS

The following revisions have been made to the Neighborhood Open Space and Recreation discussion on page 3-3 of the CPSRA Preliminary General Plan and Draft Program EIR:

Neighborhood Open Space and Recreation

The planned Candlestick Point-Hunters Point Shipyard Phase II Project includes ~~330~~approximately 240 acres of new parks and open space (Lennar Corporation 2009). Neighborhood parks, sports fields, shoreline promenades, and ecological restoration projects incorporate a wide range of recreational, cultural, educational, and nature-based programs (Figure 3-1). As a result, CPSRA will not need to provide all types of recreation facilities, duplicating those planned elsewhere in the neighborhood. Facilities such as dog runs and tennis courts do not necessarily reflect the State Parks mission, and therefore, are more appropriately located beyond CPSRA. The comprehensive park and open space enhancements planned for the neighborhood will allow CPSRA to focus on providing programs that reflect its unique characteristics and visitor interests.

Figure 3-1, Parks and Open Space, on page 3-4 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as shown on the following page.

CANDLESTICK POINT STATE RECREATION AREA

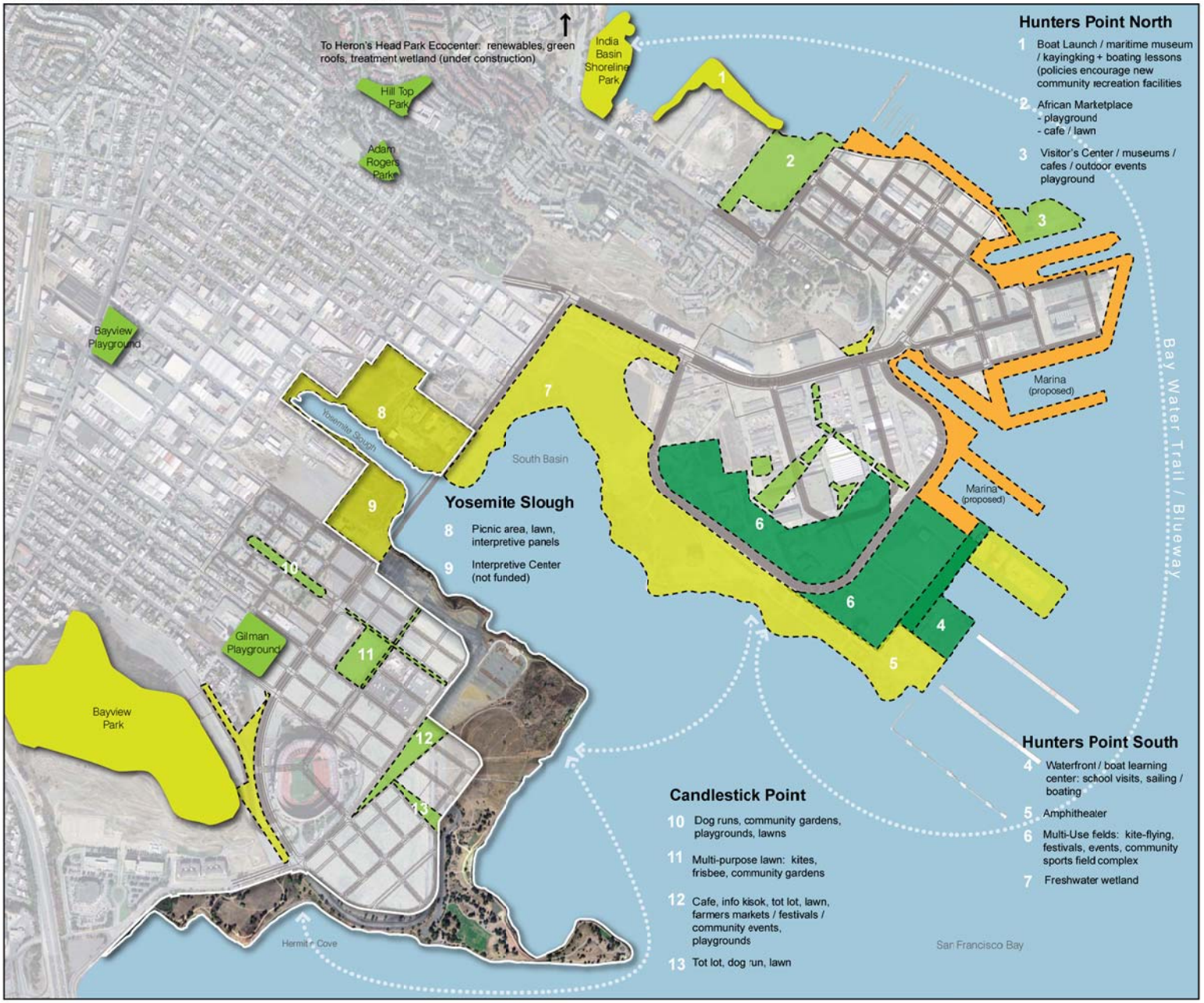


Figure 3-1

Opportunities + Constraints

PARKS + OPEN SPACE

EXISTING

- Restoration / Ecological Park
- Neighborhoood Park

PROPOSED

- Restoration / Ecological Park
- Neighborhoood Park
- Sports Field / Recreation
- Promenade

0 500 1,000 2,000 Feet

04.24.2012

AECOM

The following text has been added to Section 3.2.2, Access and Linkages, on page 3-5 of the Preliminary General Plan and Draft Program EIR:

Access to Yosemite Slough

As shown in Figure 4-1, Draft General Plan Preferred Alternative, presented on page 4-5 of the CPSRA Preliminary General Plan and Draft Program EIR, the Draft General Plan Preferred Alternative would provide multiple access points around the perimeter of the park as well as an expanded trail system to improve public access to the park and the Bay shoreline. The Draft Concept Master Plan, which is presented in Appendix C of the CPSRA Preliminary General Plan and Draft Program EIR, identifies approximately 30 access points where visitors can enter the park. Access will also be provided via a walkway adjacent to the public parking at the administration facility.

State Parks supports the goals of the Yosemite Slough Restoration Project and will work with the California State Parks Foundation during detailed design and planning to ensure adequate and appropriate access is provided along the south side of Yosemite Slough to residents of the Alice Griffith Housing Project.

The following text has been added to Section 3.2.2, Access and Linkages, on page 3-5 of the Preliminary General Plan and Draft Program EIR:

Access to CPSRA from the Surrounding Neighborhood

The CPSRA Preliminary General Plan would provide increased public access to the park in anticipation of the approximately 24,000 new residents that will live in the adjacent neighborhood following completion of the Candlestick Point-Hunters Point Shipyard Phase II Project. The CPSRA Draft Concept Master Plan, which is presented in Appendix C of the CPSRA Preliminary General Plan and Draft Program EIR, identifies approximately 30 access points where visitors can enter the park to help integrate CPSRA into the surrounding neighborhood. Every street that ends at the park will provide an entrance to the park. Access will also be provided via a walkway located adjacent to the public parking at the administration facility. In addition, wedge parks are planned within the adjacent Candlestick Point-Hunters Point Shipyard Phase II Project that will extend from planned residential areas to the park and will serve as gateways to CPSRA. The multiple park entrances will create a permeable park boundary that will encourage nearby residents to access CPSRA. The Preliminary General Plan also includes goals and guidelines to improve public access within the park to encourage visitors to access the Bay shoreline, natural areas such as Yosemite Slough, active recreation and group gathering areas, and the Bay Trail, as well as other facilities within the park. Please see Chapter 4, Park Plan.

The following revisions have been made to the last paragraph on page 3-15 of the Preliminary General Plan and Draft Program EIR:

The potential for sea level rise presents both opportunities and constraints for CPSRA. New facilities should be sited outside of those areas likely to experience the most substantial coastal flooding in the future. Shoreline treatments, including berms and levees, can also prevent flooding of areas requiring protection, such as those that experience heavy visitor use. However, other areas of the park may undertake softer strategies, such as the creation of tidal marsh to dampen storm surges and flooding. An adaptive management approach that maintains flexibility may be appropriate for some areas, such as Yosemite Slough, where the risk of flooding extends well beyond the CPSRA boundary. As part of the Yosemite Slough Restoration Project, led by the California State Parks Foundation, an adaptive management plan was developed to address sea level rise along the north shore of the slough (see Appendix E). State Parks will continue to work with the California State Parks Foundation to address sea level rise issues within CPSRA. In addition, ~~T~~the planned Candlestick Point-Hunters Point Shipyard Phase II Project intends to elevate the grade of its footprint to withstand sea level rise, and State Parks is coordinating with the City and County of San Francisco and the San Francisco Redevelopment ~~a~~Agency regarding the transition between the development's edge and CPSRA.

The following revisions have been made to the third paragraph on page 3-16 of the CPSRA Preliminary General Plan and Draft Program EIR:

Environmental Justice

Bayview Hunters Point is predominantly a low-income community of color which has historically served as the dumping ground for San Francisco's most toxic industries. Thirty-four~~Fifty~~ percent of community residents are African-American, ~~twenty~~thirty-five percent are Asian-Pacific Islander, fourteen~~fifteen~~ percent are Latino, and twenty-two~~ten~~ percent are white (SFDPH 2009d). Twenty-one~~More than fifty~~ percent of the neighborhood's population was living below the poverty level in 2000~~area households are considered low or very low income~~ (SFDPH 2009e~~Literacy for Environmental Justice, 2011~~).

The following revisions have been made to Section 3.3.1, Yosemite Slough Restoration, on page 3-27 of the Preliminary General Plan and Draft Program EIR:

3.3.1 Yosemite Slough Restoration

The 1987 CPSRA General Plan called for restoration of Yosemite Slough, a former tidal marsh reduced by filling of San Francisco Bay. ~~The Yosemite Slough Restoration Project is currently underway, and o~~Once restored, Yosemite Slough will be the largest

tidal marsh in the City and County of San Francisco. The restoration of Yosemite Slough includes restoring 12 acres of upland fill back to tidally influenced wetlands. The restoration design includes the creation of bird nesting habitat, nursery areas for fish and benthic organisms, buffer areas to sensitive habitats, new interpretive trails, and additional recreation and education amenities. The restoration project will also address soil contaminant issues arising from previous fill activities that could affect human and wildlife health (RMC and Jones & Stokes 2006). Restoration and remediation north of the slough was completed in 2011, and detailed design of Phase II (south of the slough) is scheduled for 2012.~~The restoration project consists of two phases. Phase 1 aims to restore tidal marsh vegetation to the area of CPSRA north of the slough. Restoration of this area will include remediation of 41,000 cubic yards of contaminated soil and planting of native tidal marsh vegetation. Construction of Phase 1 began in 2011. Phase 2 will include construction of interpretive trails, an extension of the Bay Trail, new parking, picnic areas, and a restroom in the Phase 1 area, as well as revegetation and an interpretive facility in the area south of the slough. The restoration project will include extensive grading to create wetland habitat. Phase 2 is currently in the conceptual phase, with plans to move forward with more detailed designs as funding becomes available (Archambault, pers. comm., 2010).~~ The CPSRA General Plan ~~incorporates~~ recognizes the Foundation's plans ~~the planning underway~~ for Yosemite Slough to promote continued restoration of the area.

The following revisions have been made to Section 3.3.2, Yosemite Slough Bridge, on page 3-27 of the Preliminary General Plan and Draft Program EIR:

3.3.2 Yosemite Slough Bridge

The planned Candlestick Point-Hunters Point Shipyard Phase II Project includes a ~~vehicle~~ bridge that would extend over Yosemite Slough, connecting Arelious Walker Drive to Fitch Street. The ~~proposed~~ bridge would be restricted to city buses, ~~with private vehicular traffic allowed only during San Francisco 49ers home games—approximately 10 days from late summer to mid-winter. B~~ bicycles, and pedestrians. ~~would be allowed on the bridge on non-game days.~~ The ~~proposed~~ bridge ~~poses compatibility issues~~ could potentially cause inconsistencies with the planned Yosemite Slough Restoration Project, which will expand public access and wildlife habitat, including islands for nesting birds. Two agreements that reference the bridge would minimize that potential. ~~The California State Parks Foundation, the organization planning and funding the restoration project for California State Parks, and Lennar Urban have agreed to collaborate on~~ The Settlement Agreement and General Release (dated January 7, 2011) between the Sierra Club, Golden Gate Audubon Society, and CP Development Company (the developer of the Candlestick Point project, including the bridge), requires the developer to consider and implement various ~~the~~ design and construction strategies of ~~the bridge~~

to reduce impacts. Similarly, the Candlestick Point State Recreation Area Reconfiguration, Improvement, and Transfer Agreement (dated April 6, 2011) between State Parks and the City and County of San Francisco, commits the City—acting as successor to the San Francisco Redevelopment Agency—to include the California State Parks Foundation and State Parks in the approval process for the bridge and to cooperate in ensuring that the bridge is consistent with the wetland, aquatic habitat, public access, and recreation objectives of the restoration project. ~~ensure that it minimizes impacts to the planned restoration and public access features and that it resolves the compatibility issue (CSPF 2010).~~

4.5 CHAPTER 4 REVISIONS

The following revisions have been made to Section 4.4.1, Yosemite Slough, on page 4-7 of the Preliminary General Plan and Draft Program EIR:

4.4.1 Yosemite Slough

This area consists of the portion of CPSRA surrounding Yosemite Slough, including the Community Garden/Plant Nursery and Administration/Maintenance zones. The Yosemite Slough Restoration Project stems from CPSRA's first General Plan ~~and has already been permitted~~. Construction of Phase I (north of the slough), began in 2011, and detailed design of Phase II (south of the slough) will occur in the future. Uses are primarily oriented around the creation of tidal marsh and upland habitats, low-impact recreation, (e.g., wildlife viewing, picnicking), and educational and interpretive activities related to the restoration project. Facilities in the Yosemite Slough area will include the existing Community Garden and native plant nursery, maintenance/administration facilities, and adjacent staff parking area; new facilities may include an information kiosk, iconic art, an interpretive area in an upland area on the north side of Yosemite Slough that could include an enclosed structure or an outdoor pavilion~~interpretive program area/pavilion~~, family gathering areas, public parking areas, and extension of the Bay Trail. Design of this area would include a key pedestrian access point to link Yosemite Slough with the nearby Alice Griffith housing development.

The following revisions have been made to Section 4.5.2, Sea Level Rise, on page 4-13 of the CPSRA Preliminary General Plan and Draft Program EIR:

4.5.2 Sea Level Rise

As a bayside park, CPSRA must consider the future effects of sea level rise. Where considered necessary to preserve park facilities, natural resources, and opportunities for visitor use, engineered solutions to sea level may be appropriate. This may include adding fill to increase the elevation of the park in certain locations, the construction of

barriers (e.g., berms, levees), and/or grading at the shoreline edge. In other locations, the response may be to retreat and allow rising seas to overflow the shoreline or other low-lying portions of the SRA. This would change the landscape of the park and may in turn result in additional improvements. For example, sea level rise that inundates the area between the Heart of the Park from The Point may create an island and lead to subsequent construction of a bridge to continue visitor access. Addressing sea level rise at CPSRA may involve adaptive management, whereby State Parks determines an appropriate response, monitors its performance, and determines the need for any modifications or other next steps. Additional technical studies would be needed to understand how sea level rise will affect different areas of the park's shoreline. An adaptive management plan to address sea level rise was developed for the north side of Yosemite Slough as part of the Yosemite Slough Restoration Project, and it is expected that a similar adaptive management strategy will be developed for the south side of the slough (see Appendix E). State Parks will continue to work with the California State Parks Foundation during detailed design and planning to address sea level rise within CPSRA.

The following guideline has been added to page 4-18 of the CPSRA Preliminary General Plan and Draft Program EIR:

Guideline Visitor Facilities-17: Provide an interpretive program area / pavilion on the upland north side of Yosemite Slough to facilitate education about the Yosemite Slough Restoration Project.

The following guideline on page 4-18 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as follows:

Guideline Interpretation-21: Develop ~~outdoor~~ interpretive facilities that can serve as multi-use areas, such as an outdoor classroom along the South Basin shoreline, an interpretive area that could include an enclosed structure or an outdoor pavilion along the north side of Yosemite Slough, and a nature theater in a location offering sweeping views of the Bay.

The following text has been added to page 4-25 of the CPSRA Preliminary General Plan and Draft Program EIR:

Shoreline Management and Water Quality

CPSRA's location on San Francisco Bay is one of its greatest assets, providing wildlife habitat and opportunities for visitor enjoyment. However, the park's bayside setting also brings challenges related to shoreline erosion, coastal flooding, water quality, and sea level rise. The park can do its part to minimize the risks to park staff, visitors, and

facilities, but park managers should also plan to adapt to changing conditions in the natural environment.

An adaptive management plan to address sea level rise was developed for the north side of Yosemite Slough as part of the Yosemite Slough Restoration Project, and it is expected that a similar adaptive management strategy will be developed for the south side of the slough. State Parks will continue to work with the California State Parks Foundation during detailed design and planning to address sea level rise within CPSRA.

The following guideline has been added to page 4-25 of the CPSRA Preliminary General Plan and Draft Program EIR:

Guideline Wildlife-6: Consider incorporating the San Francisco Planning Department's Standards for Bird-Safe Buildings[1] into any new structures that are built within the park. These standards include:

- Use of bird-safe glazing treatments on windows of new structures so that there is no more than 10% untreated glazing within the Bird Collision Zone (the portion of buildings most likely to sustain bird strikes; this area begins at grade and extends upwards for 60 feet); and
- Use of minimal lighting, shielding lighting, and avoiding the use of uplighting and event searchlights.

The following revisions have been made to the Community Programs and Facilities discussion on page 4-30 of the CPSRA Preliminary General Plan and Draft Program EIR:

Community Programs and Facilities

CPSRA is an important open space resource for the surrounding community, currently providing areas for recreation, community gatherings, and special events. The park experiences high levels of visitor use from residents in the Bayview Hunters Point neighborhood. The adjacent planned redevelopment, coupled with current recreation trends, will likely increase CPSRA's popularity as a destination for local community members and regional visitors. The provision of adequate and appropriate public access to encourage visitors to easily enter and use all areas of the park will help to integrate CPSRA into the neighborhood and maximize the community's involvement in community programs and facilities.

[1] Standards for Bird-Safe Buildings, San Francisco Planning Department, adopted July 14, 2011. Available at: http://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards%20for%20Bird%20Safe%20Buildings%20-%2011-30-11.pdf.

The following text has been added to the Agreements and Concessions discussion on page 4-55 of the CPSRA Preliminary General Plan and Draft Program EIR:

Agreements and Concessions

CPSRA has entered into a number of agreements regarding the future development, operation and maintenance of the park, pertaining to the adjacent Candlestick Point-Hunters Point Shipyard Phase II Project. These agreements provide a unique opportunity for the park to implement this General Plan, and they will require continued collaboration with the City and County of San Francisco.

State Parks has a partnership agreement with the California State Parks Foundation to complete the final design, construction estimates and permitting phase of the Yosemite Slough Restoration Project. This project has received $14.3 million from multiple funding sources, including the Wildlife Conservation Board/State Coastal Conservancy, Association of Bay Area Governments, Bay Conservation Development Commission, the City and County of San Francisco, Bay Area Rapid Transit (BART), the Richard and Rhoda Goldman Foundation, U.S. EPA Region 9 - San Francisco Bay Water Quality Improvement Fund/San Francisco Estuary Partnership, the S.D. Bechtel, Jr. Foundation, the San Francisco Foundation, the Barkley Fund, and the California Department of Parks and Recreation. The restoration project provides mitigation credits for two of the funding sources, the City and County of San Francisco and BART.

The California State Parks Foundation has entered into an agreement with Lennar Urban that governs both the design and the process related to permitting the proposed bridge across the mouth of Yosemite Slough.

The following guideline has been added to page 4-57 of the CPSRA Preliminary General Plan and Draft Program EIR:

Guideline Waste-5: Consider implementing a monofilament recycling program to educate fishermen on the dangers of fishing line for many wildlife species and to provide opportunities to reduce monofilament waste in the environment.

The following guideline on page 4-58 of the CPSRA Preliminary General Plan and Draft Program EIR has been revised as follows:

Guideline Tidal Marsh-6: Adopt an adaptive management approach for the creation and enhancement of the Tidal Marsh Zone, given the uncertainties surrounding the restoration of wetlands on artificial fill. Coordinate with the Yosemite Slough Restoration Project during development of this adaptive management approach.

4.6 CHAPTER 5 REVISIONS

The following revisions have been made to the Impact UTIL-1 discussion on page 5-41 of the CPSRA Preliminary General Plan and Draft Program EIR:

Impact UTIL-1: Increase Demand on Utilities and Service Systems.

Potable Water, Wastewater Collection, and Storm Drainage

Implementation of the General Plan would require extension, upgrade, and modification of some service infrastructure on the site to serve new facilities such as restrooms and landscape irrigation systems. It is not anticipated that the General Plan would result in a substantial increase in demand for potable water, wastewater collection or treatment capacity, or storm drainage management, and all facilities would be designed and managed per applicable standards. However, specific requirements for utilities would be determined at the time that project-level designs are developed. Implementation of Goal Energy-1, Goal Water-1, and Goal Waste-1, along with their supporting guidelines, as well as Guideline Wildlife-4, would provide for energy efficiency, implement conservation measures to minimize water use at CPSRA, and minimize generation of solid waste. Therefore, the General Plan would have a less-than-significant impact on utility demand and on service systems.

The following revisions have been made to the fourth paragraph on page 5-61 of the CPSRA Preliminary General Plan and Draft Program EIR:

Descriptions of these redevelopment projects are presented in Section 2.6, Planning Influences. The Candlestick Point-Hunters Point Shipyard Phase II Project, in particular, will substantially change the neighborhood surrounding CPSRA. As stated in Section 2.6, the new development will create over 10,500 residential units, approximately 700,000 square feet of destination retail and entertainment space, over 2.5 million square feet of commercial space oriented around a green science and technology campus, and ~~more than 300~~ approximately 240 acres of new waterfront parks. The EIR that was prepared for the development determined that it would have considerable contributions to cumulative traffic and air quality impacts that would be significant and unavoidable (SFRA and SFPD 2009). The development would also have significant and unavoidable noise and historical resources impacts.

4.7 CHAPTER 6 REVISIONS

The reference has been added to Chapter 6, References, of the CPSRA Preliminary General Plan and Draft Program EIR.

San Francisco Redevelopment Agency. June 2, 2010. Disposition and Development Agreement (Candlestick Point and Phase 2 of the Hunters Point Shipyard). Available: http://www.sfredevelopment.org/Modules/ShowDocument.aspx?documentid=2865. Accessed on April 24, 2012.

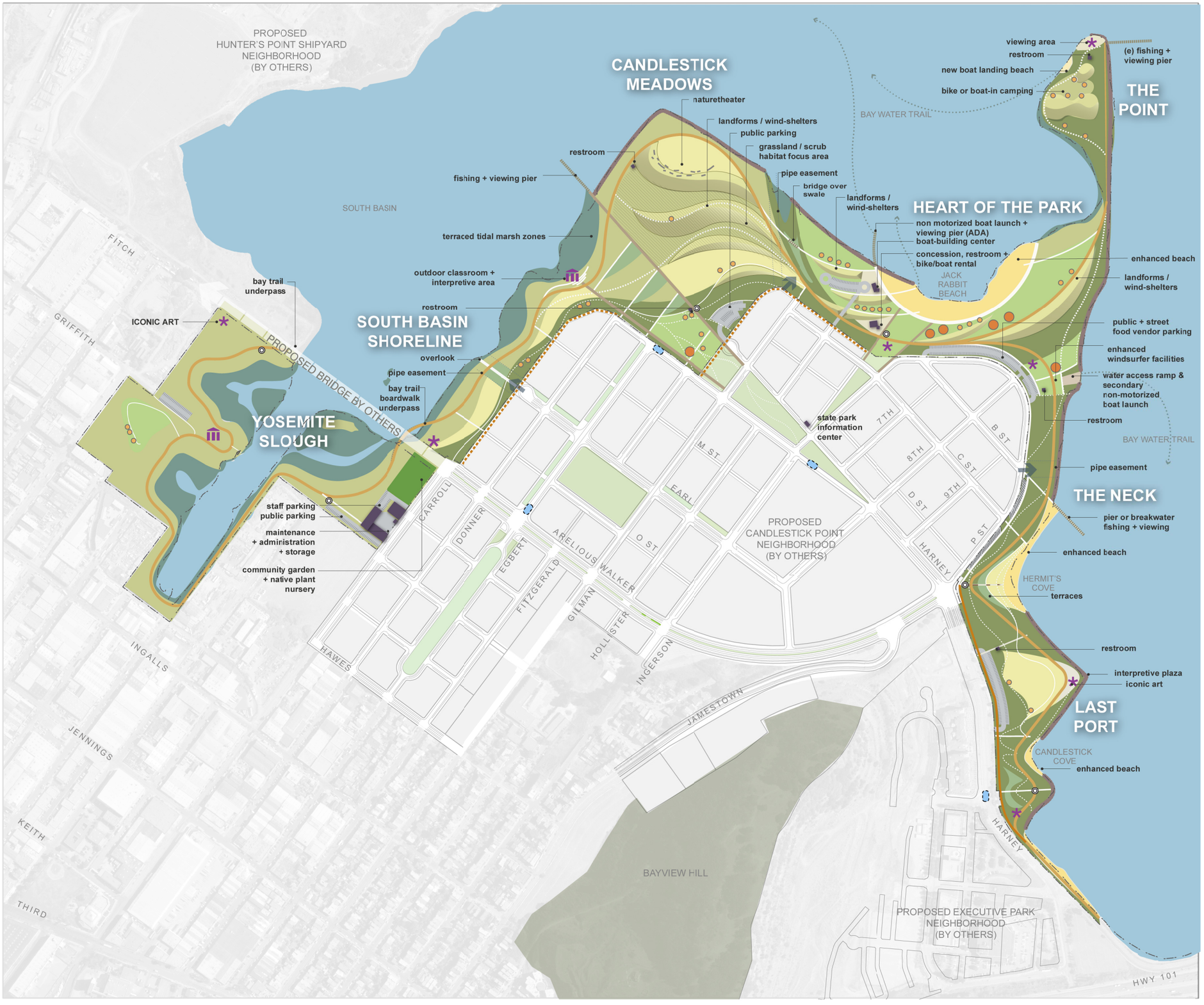
4.8 APPENDIX C REVISIONS

The CPSRA Draft Concept Master Plan has been revised as shown on the following page:

CANDLESTICK POINT STATE RECREATION AREA

Draft

CONCEPT MASTER PLAN



LANDSCAPE TYPES

- tidal marsh zones
- meadow lawn
- grassland / coastal shrub
- coastal native landscape
- active lawn
- community garden / plant nursery
- beach
- paving
- parking
- seasonal raingarden
- landforms
- coastal shoreline treatment

GATHERING AREA

- family
- group

PATH TYPES

- class 1 bike commuter connector
- class 1 (outside SRA)
- bay trail (service access)
- hard trail
- soft trail

FACILITIES

- buildings
- restrooms
- interpretive program area / pavillion
- interpretive signage / art
- info kiosk
- muni bus rapid transit stop
- overland flow point

DRAFT

0 300 600 1,200 Feet

1 inch = 600 feet as 11x17 print

04.10.12

AECOM

www.parks.ca.gov