



SAN FRANCISCO PLANNING DEPARTMENT

Planning Commission Motion No. 18638 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS

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Hearing Date: May 24, 2012
Case No.: **2010.0016E**
Project Name: **Beach Chalet Athletic Fields, Golden Gate Park**
Zoning: P (Public) Zoning District
OS (Open Space) District
Block/Lot: 1700/001
Project Sponsor: San Francisco Recreation and Park Department
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ADOPTING FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, INCLUDING FINDINGS REJECTING ALTERNATIVES AS INFEASIBLE, AMENDING A MITIGATION MEASURE, ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS, AND ADOPTING A MITIGATION, MONITORING, AND REPORTING PROGRAM, RELATING TO THE RENOVATION OF THE BEACH CHALET ATHLETIC FIELDS FACILITY LOCATED IN GOLDEN GATE PARK AND INCLUDING REPLACING THE EXISTING GRASS TURF FIELDS WITH SYNTHETIC TURF, INSTALLING FIELD LIGHTING, RENOVATING THE EXISTING RESTROOM BUILDING, INSTALLING PLAYER BENCHES AND SEATING, AND COMPLETING OTHER MODIFICATIONS FOR PARKING, CIRCULATION, AND SPECTATOR AMENITIES TO IMPROVE THE OVERALL CONDITIONS OF THE FACILITY AND INCREASE THE AMOUNT OF ATHLETIC PLAY TIME WITHIN THE P (PUBLIC) ZONING DISTRICT AND THE OPEN SPACE HEIGHT AND BULK DISTRICT.

PREAMBLE

On June 15, 2010, the San Francisco Recreation and Parks Department ("Project Sponsor") submitted an Environmental Evaluation Application to the Planning Department ("Department"), Case No. 2010.0016E, in connection with a project to renovate of the Beach Chalet Athletic Fields facility, located at 1500 John F. Kennedy Drive in Golden Gate Park, which includes replacing the existing grass turf fields with synthetic turf, installing field lighting, renovating the existing restroom building, installing player benches and seating, and completing other modifications for parking, circulation, and spectator amenities to improve the overall conditions of the facility and increase the amount of athletic play time ("Project").

On February 2, 2011, the Department issued a Notice of Preparation of an Environmental Impact Report (NOP) for the Project.

On October 26, 2011, the Department published the Draft Environmental Impact Report ("DEIR" or "Draft EIR") for the Project and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment. The DEIR was available for public comment until December 12, 2011.

The San Francisco Planning Commission held a public hearing on the DEIR on December 1, 2011 at a regularly scheduled meeting to solicit public comment regarding the DEIR.

The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 47-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a Draft Comments and Responses document, published on May 9, 2012, distributed to the Planning Commission and all parties who commented on the DEIR, and made available to others upon request at the Department.

A Final Environmental Impact Report ("FEIR" or "Final EIR") was prepared by the Department, consisting of the Draft EIR and the Comments and Responses document.

Project Environmental Impact Report files have been made available for review by this Commission and the public. These files are available for public review at the Planning Department at 1650 Mission Street, and are part of the record before this Commission.

On May 24, 2012, the Planning Commission reviewed and considered the Final EIR and found that the contents of the report and the procedures through which the Final EIR was prepared, publicized, and reviewed complied with the California Environmental Quality Act (California Public Resources Code section 21000 *et seq.*) ("CEQA"), 14 California Code of Regulations sections 15000 *et seq.* ("CEQA Guidelines"), and Chapter 31 of the San Francisco Administrative Code ("Chapter 31").

The Commission found the Final EIR was adequate, accurate and objective, reflected the independent analysis and judgment of the Department and the Commission, and that the summary of comments and responses contained no significant revisions to the Draft EIR, and approved the Final EIR for the Project in compliance with CEQA, the CEQA Guidelines and Chapter 31.

The Planning Department, Linda Avery, is the custodian of records, located in the File for Case No. 2010.0016E, at 1650 Mission Street, Fourth Floor, San Francisco, California.

Department staff prepared a Mitigation Monitoring and Reporting Program ("MMRP") for the Project and these materials were made available to the public and this Commission for this Commission's review, consideration and action.

On May 24, 2012, the Commission conducted a duly noticed public hearing at a regularly scheduled meeting on Case Nos. 2010.0016E. The Commission has heard and considered the testimony presented to it at the public hearing and has further considered written materials and oral testimony presented on behalf of the applicant, the Planning Department staff, and other interested parties.

MOVED, that the Commission hereby adopts findings under the California Environmental Quality Act, including rejecting alternatives as infeasible and adopting a Statement of Overriding Considerations, and adopts the MMRP attached as Exhibit A based on the following findings:

FINDINGS

Having reviewed the materials identified in the preamble above, and having heard all testimony and arguments, this Commission finds, concludes, and determines as follows:

In determining to approve the Project, the Commission makes and adopts the following findings of fact and decisions regarding mitigation measures and alternatives, and adopts the statement of overriding considerations, based on substantial evidence in the whole record of this proceeding and pursuant to CEQA, the CEQA Guidelines, and Chapter 31.

This document is organized as follows:

Section I provides a description of the proposed Project, the environmental review process for the Project, the approval actions to be taken, and the location of records;

Section II identifies the Project's potentially significant impacts that are avoided or reduced to less-than-significant levels and makes findings regarding Mitigation Measures;

Section III identifies significant, unavoidable impacts that cannot be avoided or reduced to less-than-significant levels through Mitigation Measures;

Section IV identifies the Project alternatives that were analyzed in the EIR and discusses the reasons for the rejection of these alternatives; and

Section V makes a Statement of Overriding Considerations setting forth the specific economic, legal, social, technological, or other benefits of the Project that outweigh the significant and unavoidable adverse environmental effects and support the rejection of the project alternatives;

The Mitigation Monitoring and Reporting Program ("MMRP"), for the mitigation measures that have been proposed for adoption is attached with these findings as Exhibit A. The MMRP is required by CEQA Section 21081.6 and CEQA Guidelines Section 15091. The MMRP provides a table setting forth each mitigation measure listed in the Final EIR that is required to reduce or avoid a significant adverse impact, with the exception of Mitigation Measure M-CP-1, which is hereby amended by these findings because it may not be feasible to implement as described in the FEIR, as described in more detail below. The MMRP also specifies the agency responsible for implementation of each measure, establishes monitoring actions and a monitoring schedule.

I. PROJECT DESCRIPTION

a. Project Description

The Project Sponsor, the San Francisco Recreation and Parks Department ("SFRPD"), is proposing to renovate the Beach Chalet Athletic Fields facility, an approximately 9.4-acre public sports field facility

located at 1500 John F. Kennedy Drive, along the western edge of Golden Gate Park ("Project Site"). The Project Site currently includes four grass turf athletic fields surrounded by an 8-foot-tall metal chain link fence, an approximately 25,320-square-foot, 50-space asphalt parking lot (including one disabled-accessible space), a restroom building, and a cargo container being used as a maintenance shed. The Project includes replacing the existing grass turf fields with synthetic turf, installing field lighting, renovating the existing restroom building, installing player benches and spectator seating, expansion of the parking lot and various other modifications intended to improve the overall conditions of the facility and increase the amount of play time available on the athletic fields.

b. Project Objectives

The objectives of the Project include the following:

- Increase the amount of athletic play time on the Beach Chalet Athletic Fields by renovating the existing athletic fields and adjacent warm-up areas.
- Improve public access to the Beach Chalet Athletic Fields by adding new pathways, increasing the size of the existing parking lot, providing a formal drop-off area, and providing bicycle racks.
- Increase ground-sports athletic opportunities on the north side of San Francisco commensurate with improvements elsewhere in San Francisco.
- Provide a safe, optimal recreation facility and amenities for athletes, spectators, and park users by renovating the existing Beach Chalet Athletic Fields and the existing restroom building, adding bleachers, and installing a new plaza area with visitor amenities.
- Reduce ongoing maintenance and resource needs.
- Comply with current Americans with Disabilities Act (ADA) requirements.
- Improve safety and increase nighttime use of the west end of Golden Gate Park by installing new lighting and bringing more recreation facility users to the area.
- Remain consistent with the *Golden Gate Park Master Plan*.

c. Environmental Review

On February 2, 2011, the Planning Department issued a Notice of Preparation of an Environmental Impact Report (NOP) for the Project.

On February 2, 2011, the Department published an Initial Study for the Project, scoping out several impact areas from further review because the Project would either have no effect or a less-than-significant effect without mitigation related to those impact areas.

On October 26, 2011, the Planning Department published the DEIR and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DEIR; this notice was mailed to the Planning Department's list of persons requesting such notice.

Notices of availability of the DEIR and of the date and time of the public hearing were posted near the project site by Planning Department staff on or about October 26, 2011. On October 26, 2011, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies, the latter both directly and through the State Clearinghouse.

Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on October 26, 2011.

The Commission held a duly advertised public hearing on the DEIR on December 1, 2011 at which opportunity for public comment was given, and public comment was received on the DEIR. The period for acceptance of written comments ended on December 12, 2011.

The Planning Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 47-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a Draft Comments and Responses document, published on May 9, 2012, distributed to the Planning Commission and all parties who commented on the DEIR, and made available to others upon request at the Planning Department.

A Final Environmental Impact Report has been prepared by the Planning Department, consisting of the Draft Environmental Impact Report and the Comments and Responses document. Since publication of the DEIR, no new information of significance has become available that would require recirculation of the EIR under CEQA Guidelines Section 15088.5.

On May 24, 2012, the Planning Commission reviewed and considered the Final Environmental Impact Report, certified said Report as complete, and found that the contents of said report and the procedures through which the Final Environmental Impact Report was prepared, publicized, and reviewed complied with the provisions of CEQA, the CEQA Guidelines, and Chapter 31.

d. Project Approval Actions

Planning Commission

- Certification of the Final EIR
- Determination of consistency with the *San Francisco General Plan*
- Issuance of Coastal Development Permit

Recreation and Park Commission

- Approval of the Beach Chalet Athletic Fields Renovation Project

Board of Supervisors

- Consideration of any appeals of the Planning Commission's certification of the Final EIR

San Francisco Public Utilities Commission

- Certification of compliance with the San Francisco Stormwater Design Guidelines and the San Francisco Stormwater Management Ordinance
- Confirmation of compliance with the San Francisco Water Efficient Irrigation Ordinance requirements.

e. Location of Records

The records upon which all findings and determinations related to the adoption of the Project are based include the following:

- The Final EIR, and all documents referenced in or relied upon by the Final EIR;
- All information (including written evidence and testimony) provided by City staff to the Commission relating to the Final EIR, the proposed approvals and entitlements, the Project, and the alternatives set forth in the Final EIR;
- All information (including written evidence and testimony) presented to the Commission by the environmental consultant and sub consultants who prepared the Final EIR, or incorporated into reports presented to the Commission;
- All information (including written evidence and testimony) presented to the City from other public agencies relating to the Project or the Final EIR;
- All applications, letters, testimony, and presentations presented to the City by the Project Sponsor and its consultants in connection with the Project;
- All information (including written evidence and testimony) presented at any public hearing or workshop related to the Project and the Final EIR;
- The Mitigation Monitoring and Reporting Program (MMRP); and
- All other documents comprising the record pursuant to Public Resources Code Section 21167.6(e).

The public hearing transcript, a copy of all letters regarding the Final EIR received during the public review period, the administrative record, and background documentation for the Final EIR are located at the Planning Department, 1650 Mission Street, 4th Floor, San Francisco. The Planning Commission Secretary is the custodian of these documents and materials. The Recreation and Park Commission Secretary is the custodian of Project documents and materials on file at the Recreation and Park Department Headquarters in Golden Gate Park.

These findings are based upon substantial evidence in the entire record before the Commission. The references set forth in these findings to certain pages or sections of the Draft EIR or responses to comments in the Final EIR are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings.

II. LESS-THAN-SIGNIFICANT IMPACTS AND FINDINGS REGARDING MITIGATION MEASURES

The following Sections II and III set forth the Commission's findings about the Final EIR's determinations regarding significant environmental impacts and the mitigation measures proposed to address them. These findings provide the written analysis and conclusions of the Commission regarding the environmental impacts of the Project and the mitigation measures included as part of the Final EIR and

adopted by the Commission and other City decision makers as part of the Project. To avoid duplication and redundancy, and because the Commission agrees with, and hereby adopts, the conclusions in the Final EIR, these findings will not repeat the analysis and conclusions in the Final EIR, but instead incorporates them by reference herein and relies upon them as substantial evidence supporting these findings.

In making these findings, the Commission has considered the opinions of City staff and experts, other agencies and members of the public. The Commission finds that the determination of significance thresholds is a judgment decision within the discretion of the City and County of San Francisco; the significance thresholds used in the EIR are supported by substantial evidence in the record, including the expert opinion of the EIR preparers and City staff; and the significance thresholds used in the EIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project.

As set forth below, the Commission adopts and incorporates all of the mitigation measures set forth in the Final EIR and the attached MMRP to substantially lessen or avoid the potentially significant and significant impacts of the Project, with the exception of Mitigation Measure M-CP-1, which is modified by these findings as set forth below due a finding that implementation of the measure as described in the Final EIR may be infeasible. The Commission and other City decision makers intend to adopt each of the mitigation measures proposed in the Final EIR, except as specifically modified by these findings. Accordingly, in the event a mitigation measure recommended in the Final EIR has inadvertently been omitted in these findings or the MMRP, such mitigation measure is hereby adopted and incorporated in the findings below by reference. In addition, in the event the language describing a mitigation measure set forth in these findings or the MMRP fails to accurately reflect the mitigation measures in the Final EIR due to a clerical error, the language of the policies and implementation measures as set forth in the Final EIR shall control. The impact numbers and mitigation measure numbers used in these findings reflect the information contained in the Final EIR.

Implementation of the Project would result in less-than-significant impacts in the following environmental topic areas and, as such, no mitigation is required to address these impacts:

- Land Use and Land Use Planning
- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Geology and Soils
- Greenhouse Gas Emissions
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Transportation and Circulation
- Recreation and Public Space
- Utilities and Service Systems

- Hydrology and Water Quality.

Implementation of the Project with required mitigation measures would result in less than significant impacts for the following environmental topic areas:

- Biological Resources
- Hazards and Hazardous Materials

With the required mitigation measures, all potential project impacts, with the exception of impacts of the related to Cultural Resources as described in Section III below, would be avoided or reduced to a less-than-significant level.

As authorized by CEQA Section 21081 and CEQA Guidelines Section 15091, 15092, and 15093, based on substantial evidence in the whole record of this proceeding, the Commission finds that, with one exception, all of the changes or alterations to the Project listed herein have been or will be required in, or incorporated into, the Project to mitigate or avoid the significant or potentially significant environmental impacts listed herein, as identified in the Final EIR, that these mitigation measures will be effective to reduce or avoid the potentially significant impacts as described in the EIR, and these mitigation measures are feasible to implement and are within the responsibility and jurisdiction of the City and County of San Francisco to implement or enforce. As set forth in more detail below, Mitigation Measure M-CP-1 is amended by these findings, as set forth in the attached MMRP, due to the potential infeasibility of fully complying with the mitigation measure as described in the Final EIR while also complying with accessibility requirements.

a. Biological Resources

Impact BI-1: The Project could potentially adversely impact species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service. Specifically, sixteen trees and forty-four shrubs would be removed as part of the implementation of the Project, and this removal could result in impacts to special status species bat species due to impacts to their nesting, roosting or foraging habitat.

As described in **Mitigation Measure M-BI-1**, approval for building and grading permits issued for demolition and construction within the project area shall include a requirement for pre-construction special-status bat surveys when large trees are to be removed. If active day or night roosts are found, the bat biologist shall take actions to make such roosts unsuitable habitat prior to tree removal or building demolition. A no-disturbance buffer of 100 feet shall be created around active bat roosts being used for maternity or hibernation purposes. Bat roosts initiated during construction are presumed to be unaffected, and no buffer would be necessary.

Impact BI-3: The Project could potentially conflict with applicable local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Specifically, sixteen trees would be removed as part of the implementation of the Project, and this removal could conflict with policies set forth in the Golden Gate Park Master Plan.

As described in **Mitigation Measure M-BI-3**, SFRPD shall replace the trees removed within SFRPD-managed lands with trees of equivalent ecological value (i.e., similar species providing the same general microhabitat characteristics for wildlife species) to the trees removed. If trees of equivalent ecological value are not feasible or available, removed trees shall be replaced at a ratio of 1 inch for 1 inch of the diameter at breast height of the removed tree. SFRPD shall monitor tree replacement plantings annually for a minimum of three years after completion of construction to ensure establishment of the plantings and, if necessary, shall replant to ensure the success of the replacement plantings.

The Commission finds that the foregoing mitigation measures are feasible and will mitigate the potential impacts of project construction on biological resources to a less-than-significant level by ensuring that special status bats and the ecological value of Golden Gate Park are not adversely affected by proposed tree removal. These measures are adopted as a condition of project approval and are set forth in the MMRP, attached as Exhibit A.

b. Hazards and Hazardous Materials and Air Quality

Impact HZ-2: The Project could create a significant hazard to the public or the environment as a result of a release of hazardous building materials in structures that would be demolished. Specifically, the FEIR identifies potential hazardous building materials that could be in the restroom building and, if disturbed, could pose health threats if not properly disposed.

As described in **Mitigation Measure M-HZ-2**, the project sponsor shall ensure that, before renovation, the restroom building is surveyed for hazardous building materials, including PCB-containing electrical equipment, fluorescent light ballasts containing PCBs or DEHP, and fluorescent light tubes containing mercury vapors. These materials shall be removed and properly disposed of before commencement of demolition or renovation. Old light ballasts that will be removed during renovation shall be evaluated for the presence of PCBs, and in the case where the presence of PCBs in the light ballast could not be verified, they will be assumed to contain PCBs, and handled and disposed of as such, according to applicable laws and regulations.

The Commission finds that the foregoing mitigation measures are feasible and will mitigate the potential impacts of project construction related to hazardous materials to a less-than-significant level. This measure is adopted as a condition of project approval and is set forth in the MMRP, attached as Exhibit A.

III. SIGNIFICANT IMPACTS THAT CANNOT BE AVOIDED OR REDUCED TO A LESS-THAN-SIGNIFICANT LEVEL AND AMENDMENT OF MITIGATION MEASURE M-CP-1

Based on substantial evidence in the whole record of these proceedings, the Commission finds that there are significant project-specific or cumulative impacts that would not be eliminated or reduced to an insignificant level by the mitigation measures listed in Exhibit 1. The Final EIR identifies a significant and unavoidable adverse effect to cultural (historic architectural) resources related to the addition of field lights circulation paths, and spectator seating, and the removal of grass turf and installation of synthetic turf. The combined result of these improvements is a significant impact to historic resources because the alterations would alter many of the character defining features that convey the Athletic Fields' historic significance and justifying its inclusion in the Golden Gate Park National Register Historic District. As

the installation of spectator seating, synthetic turf, and field lights are crucial to the implementation of the proposed project, there are no mitigation measures for these elements that would reduce the level of impact to the less-than-significant level while continuing to meet the objectives of the project.

The Commission determines that the following significant impact on the environment, as reflected in the Final EIR, is unavoidable, but under Public Resources Code Section 21081(a)(3) and (b), and CEQA Guidelines 15091(a)(3), 15092(b)(2)(B), and 15093, the Commission determines that the impact is acceptable due to the overriding considerations described in Section V below. This finding is supported by substantial evidence in the record of this proceeding.

Cultural Resources (Historic Architectural Resources)

Impact CP-1: The Project would cause a substantial adverse change in the significance of a historic resource as defined in CEQA Guidelines Section 15064.5. The Beach Chalet Athletic Fields Renovation Project would materially impair in an adverse manner many of the character defining features of the Beach Chalet Athletic Fields, a contributor to the Golden Gate Park National Historic District. Alterations to the Athletic Fields, including the addition of spectator seating, synthetic turf, and field lights would collectively result in a significant impact under the CEQA definition of material impairment because they would alter in an adverse manner many of the character defining features that convey the Athletic Fields' historical significance and justify its inclusion in the National Register (and therefore the California Register) as a contributor to the Golden Gate Park National Register Historic District.

Mitigation Measure M-CP-1, as described in the FEIR, requires that the circulation paths be designed with a more naturalistic and compatible surface material such as decomposed granite, NaturePave (a decomposed granite product with a resin binding agent), or compacted earth in place of the proposed concrete surface materials. As set forth in the FEIR, Mitigation Measure M-CP-1 further requires that the paths also be redesigned to create a more informal path edge treatment such as a 'soft' planted edge.

Although technologically feasible to use, decomposed granite and other similar soft ground materials do not provide an accessible surface for walkways because they are not always stable, firm and slip-resistant. Because of this, it may not be feasible to use such materials and meet the accessibility requirements for the proposed project. Compliance with accessibility requirements for public facilities is, in addition to being legally required, a stated objective of the Project. Additionally, implementation of Mitigation Measure M-CP-1 alone would not reduce the overall impact to the cultural landscape to a less-than-significant level.

The Commission, based on information set forth in the administrative record and these findings, hereby amends Mitigation Measure M-CP_1 as follows (changes from the language used in the FEIR are shown in ~~strike through~~ for deletions and underline for additions):

Mitigation Measure M-CP-1: The circulation paths shall be redesigned to include a more naturalistic and compatible surface material such as decomposed granite, NaturePave (a decomposed granite product with a resin binding agent), or compacted earth in place of the proposed concrete surface materials if such redesign can be accomplished while still meeting all applicable accessibility requirements. The paths shall

also be redesigned to consider a more informal path edge treatment such as a 'soft' planted edge if such redesign can be accomplished while still meeting all applicable accessibility requirements. The SFRPD shall determine the feasibility of using these alternate materials and edge treatments in consultation with the Mayor's Office on Disability.

Although the Commission hereby adopts this Mitigation Measure, as amended, and as set forth in the attached MMRP, the Commission finds that this measure will not mitigate significant and unavoidable impact related to the addition of field lights, spectator seating, and synthetic turf to the athletic fields facility, considered an historic resource for purposes of environmental review, to less-than-significant levels. The Commission further finds that this impact would remain significant and unavoidable with the implementation of Mitigation Measure M-CP-1 either in the form described in the FEIR or as hereby amended and set forth in the MMRP, the Commission determines that this significant impact on the environment, as reflected in the Final EIR, is unavoidable, but under Public Resources Code section 21081(a)(3) and (b), and CEQA Guidelines 15091(a)(3), 15092(b)(2)(b), and 15093, the Commission determines that the impact is acceptable due to the overriding considerations described in Section V below. This finding is supported by substantial evidence in the record of this proceeding.

IV. EVALUATION OF PROJECT ALTERNATIVES

This section describes the Project alternatives and the reasons for approving the project and for rejecting the alternatives. CEQA mandates that an EIR evaluate a reasonable range of alternatives to the Project or the Project location that generally reduce or avoid potentially significant impacts of the Project. CEQA requires that every EIR also evaluate a "No Project" alternative. Alternatives provide a basis of comparison to the Project in terms of their significant impacts and their ability to meet the Project objectives. This comparative analysis is used to consider reasonable, potentially feasible options for minimizing environmental consequences of the Project.

The FEIR analyzed four project alternatives: a "No Project Alternative", an "Off-Site Alternative", a "Grass Turf with Reduced Lights Alternative", and a "Synthetic Turf without Lights Alternative." The FEIR determined that these alternatives were potentially feasible, but did not necessarily meet the project sponsors' objectives. A brief description of each alternative is provided below, followed by findings related to the rationale for the City's rejection of each alternative.

The Commission rejects the Alternatives set forth in the Final EIR and listed below because it finds, in addition to the reasons described below, elsewhere in these Findings, and in the administrative record, that there is substantial evidence, including evidence of economic, legal, social, technological, and other considerations under CEQA Guidelines 15091(a)(3), that make infeasible such alternatives. In making these determinations, the Commission is aware that CEQA defines "feasibility" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors."

The Commission certifies that it has independently reviewed and considered the information on the alternatives provided in the Final EIR and in the record. The Final EIR reflects the Commission's and the City's independent judgment as to the alternatives. The Commission finds that the Project provides the best balance between satisfaction of the project objectives and mitigation of environmental impacts to the extent feasible, as described and analyzed in the EIR and adopts a statement of overriding considerations as set forth in Section IV below.

The Commission adopts the EIR's analysis and conclusions regarding alternatives eliminated from further consideration, both during the scoping process and in response to comments.

a. No Project Alternative

Under the No Project Alternative, the existing fields would remain in use and no renovations to the field or other facilities would occur. The No Project Alternative includes those activities that would reasonably be expected to occur in the foreseeable future if the proposed project were not approved.

The No Project Alternative would eliminate the need for construction activities in the project area, thereby avoiding all construction impacts identified for the proposed project, including the significant and unavoidable impact on historic resources, and the significant impacts associated with biological resources, and hazards and hazardous materials. In addition, although not considered a significant impact, impacts on views of the project area and nighttime lighting would be avoided under the No Project Alternative. Other less than significant impacts associated with construction noise, traffic, and air quality would also be avoided under the No Project Alternative. Other proposed future projects in the site vicinity may still be implemented, including the San Francisco Groundwater Supply Project, and so cumulative construction impacts could still occur, but there would be no contribution to these impacts from the proposed project.

The Commission rejects the No Project Alternative because it would fail to meet most of the Project objectives. While the No Project Alternative would remain consistent with the Golden Gate Master Plan, the No Project Alternative would not meet any other objectives which include increasing the amount of athletic play on the Beach Chalet Athletic Fields by renovating the existing athletic fields and adjacent warm-up areas; improving public access to the Beach Chalet Athletic Fields by adding new pathways, increasing the size of the existing parking lot, providing a formal drop-off area, and providing bicycle racks; increasing ground-sports athletic opportunities on the north side of San Francisco commensurate with improvements elsewhere in San Francisco; reducing ongoing maintenance and resource needs; complying with current ADA requirements, and; improving safety and increasing nighttime use of the west end of Golden Gate Park by installing new lighting and bringing more recreation facility users to the area. All of the reasons stated herein provide sufficient independent grounds for rejecting this alternative.

b. Off-Site Alternative

Under the Off-Site Alternative, the San Francisco Recreation and Parks Department (SFRPD) would construct similar renovations to the West Sunset Playground, located on Ortega Street in the Outer Sunset neighborhood.

The Off-Site Alternative would have construction-related impacts similar to or greater than the proposed project because the fields are more proximate to sensitive receptors such as schools and residences than the project site. It is assumed that this alternative would be compatible with existing zoning and land use designations because the site is already used for recreational purposes. Because the Off-Site Alternative would entail similar construction activities as the proposed project, impacts related to biological resources, hydrology and water quality, and hazards and hazardous material would be comparable to those under the Project. However, under the Off-Site Alternative, visual resources impacts associated with nighttime lighting effects would likely be greater than that of the proposed project. Historic resources impacts would be less than significant.

Under this alternative, impacts to recreational resources are anticipated to be greater than those identified for the proposed project because the Beach Chalet Athletic Fields would continue to be used and would continue to degrade. It is also assumed that effects associated with increased traffic, transit, parking, and pedestrian access would be similar to or greater than the proposed project.

The Commission rejects the Off-Site Alternative because it would fail to meet most of the Project objectives and would not increase the amount of athletic play time on the Beach Chalet Athletic Fields by renovating the existing athletic fields and adjacent warm-up areas, although it would partially meet this objective by providing some increase play time for SFRPD overall, the alternative would fail to meet the objective of improving safety and increasing nighttime use of the west end of Golden Gate Park by installing new lighting and bringing more recreation facility users to the area. This alternative would also fail to meet the objectives of improving public access to the Beach Chalet Athletic Fields by adding new pathways, increasing the size of the existing parking lot, providing a formal drop-off area, and providing bicycle racks, and increasing ground-sports athletic opportunities on the north side of San Francisco commensurate with improvements elsewhere in San Francisco.

The Off-Site Alternative would only partially achieve some of the Project objectives while all of the same mitigation measures would be required.

All of the reasons stated herein provide sufficient independent grounds for rejecting this alternative.

c. Grass Turf with Reduced Lights Alternative

Under the Grass Turf with Reduced Lights Alternative, the SFRPD would construct most of the improvements that are included under the Project with the exception that a new grass turf field would be installed instead of a synthetic turf field. This alternative also includes modifications to some of the proposed improvements. It is assumed that the new grass turf field would be similar in size to the turf field under the proposed project. The intent of this alternative would be to reduce impacts to historic resources. All of the same mitigation measures as the proposed project would be required under this alternative.

The Grass Turf with Reduced Lights Alternative would have similar construction-related impacts as the proposed project, with the exception of construction activities associated with synthetic turf installation. This alternative will have similar restroom renovations to the proposed project, therefore hazards and hazardous material impacts are anticipated to be comparable to the proposed project. Construction-related impacts to special-status bats, vegetation, and tree removal would be similar under this alternative. Implementation of pre-construction surveys for special-status bats would be required under this alternative.

Under this alternative, impacts to historic resources would be less in comparison to the Project. The replacement of grass turf; reduced number of field lights; small-scale, removable seating instead of spectator seating; and linear circulation paths composed of decomposed granite material and a 'soft' planted edge instead of concrete would collectively reduce impacts to historic resources. Installation of such components under this alternative would allow the site to remain a contributing resource to the Golden Gate Park National Historic District. Although technologically feasible to use, decomposed granite and other similar soft ground materials do not provide an accessible surface for walkways

because they are not always stable, firm and slip-resistant. Because of this, it may not be feasible to use such materials and meet the accessibility requirements for the Project. The installation of the reduced number of lights would result in less visual impacts on surrounding residences as the Project (though it is noted that impacts related to aesthetics are less than significant under the Project).

While this alternative would remain consistent with the Golden Gate Master Plan and improve access to the fields with new pathways and increased parking for cars and bikes, it would fail to meet the objective of reducing ongoing maintenance and resource needs; instead, it would require a greater level of maintenance work to preserve field conditions. A greater level of maintenance would be needed because the new grass fields would be larger than the existing fields under this alternative and would be used at a greater level with the inclusion of nighttime play hours. Decomposed granite may not be considered acceptable under applicable disability access requirements and therefore might not be a feasible alternative material. While there would be some increase in play time at the facility, it would be substantially less than under the Project due to: (1) a 50% reduction in the number of lit fields; (2) maintenance and rest and re-growth closures; and (3) rain closures.

The Grass Turf with Reduced Lights Alternative would only partially achieve the objective to provide for a safe, optimal recreation facility and amenities for athletes, spectators and park users by renovating the existing Beach Chalet Athletic Fields and the existing restroom building, adding bleachers, and installing a new plaza area with visitor amenities. While installation of new lighting would accommodate additional evening playtime, some of the deficiencies at the existing facility, such as wet periods and maintenance periods, would likely persist, reoccur or worsen unless public access was restricted during existing permitted play times.

The Commission rejects the Grass Turf with Reduced Lights Alternative because it would fail to meet some of the project objectives and would require additional staff maintenance levels beyond what is currently available. While the Grass Turf with Reduced Lights Alternative would remain consistent with the Golden Gate Master Plan and improve access to the facilities, it would not meet many of the other objectives, which include increasing the amount of athletic play on the Beach Chalet Athletic Fields and increasing ground-sports athletic opportunities on the north side of San Francisco commensurate with improvements elsewhere in San Francisco. In particular, this alternative fails to reduce ongoing maintenance and resource needs, rather it increases the maintenance resource needs with an increased field size and play time. The alternative may not be consistent with current ADA requirements because of the inconsistent Grass Turf surface. For the foregoing reasons, the Commission rejects this alternative. In addition, all of the reasons stated herein provide sufficient independent grounds for rejecting this alternative.

d. Synthetic Turf without Lights Alternative

Under the Synthetic Turf without Lights Alternative, the SFRPD would construct most of the improvements that are included under the Project except for the installation of field lighting. This alternative also includes modifications to some of the proposed improvements, installation of small-scale, removable seating such as benches or low-profile bleachers and installation of linear circulation paths using decomposed granite with a 'soft' planted edge. As stated above, although technologically feasible to use, decomposed granite and other similar soft ground materials do not provide an accessible surface for walkways because they are not always stable, firm and slip-resistant. Because of this, it may not be

feasible to use such materials and meet the accessibility requirements for the Project. The intent of this alternative would be to reduce impacts to historic resources.

The Synthetic Turf without Lights Alternative would have similar but slightly reduced construction-related impacts in comparison to the proposed project, with the exception of construction activities associated with field lighting installation. Therefore, hazards and hazardous material impacts and hydrology and water quality impacts are anticipated to be the same as those determined under the Project.

Under this alternative, impacts to aesthetics would be less than those of the Project as this alternative would not introduce any new lighting and would not result in any changes to nighttime views, or adversely affect views from outside the boundaries of the project site (though it is noted that impacts related to aesthetics resources are less than significant under the Project).

Impacts to historic resources would also be less in comparison to the Project due to the elimination of field lighting, the installation of small-scale, removable seating (i.e., benches or low-profile bleachers), a pathway system comprised of decomposed granite, and a "soft" planted edge that would allow the site to remain a contributing resource to the Golden Gate Park National Historic District. However, as discussed elsewhere, use of decomposed granite or a similar material and a "soft" planted edge for the pathway system may not be feasible due to accessibility requirements.

In terms of traffic generated by this alternative, it is anticipated that traffic levels would be less than that of the Project since use of the Athletic Fields would be restricted to daytime hours and use levels would be lower than the Project.

Under this alternative, the installation of synthetic turf would still result in vegetation and tree removal. Thus, construction-related impacts on trees and special-status bats would be the same as the Project and mitigation would be available to lessen this impact. However, unlike the Project, less than significant adverse nighttime lighting effects on migratory birds would be eliminated.

The Synthetic Turf without Lights Alternative would achieve most of the Project objectives, but would fail to meet two of the Project objectives. As most of the components under this alternative are the same as the Project, this alternative would meet the objectives related to improved public access to the Beach Chalet Athletic Fields by adding new pathways, increasing the size of the existing parking lot, providing a formal drop-off area, and providing bicycle racks, increased ground-sports opportunities on the north side of San Francisco commensurate with improvements elsewhere in San Francisco, reduction of ongoing maintenance and resource needs, and increasing the amount of athletic play time at the Beach Chalet Athletic Fields by renovating the existing athletic fields and adjacent warm-up areas.

The Commission rejects the Synthetic Turf without Lights Alternative, because it would fail to meet the objective pertaining to improved safety and increased nighttime use of the west end of Golden Gate Park. The Synthetic Turf without Lights Alternative would only partially achieve the objective to provide a safe, optimal recreation facility and amenities for athletes, spectators, and park users. The absence of field lighting would restrict use of the fields to daytime hours only and therefore the increase in play hours would be less than with the proposed project. Although impacts to historic resources would be reduced, this alternative would not meet current accessibility requirements because it cannot be stated with

certainty that decomposed granite would meet all applicable accessible requirements, and therefore, may not be feasible for use in the project.

For the foregoing reasons, the Commission rejects this alternative. Further, all of the reasons stated herein provide sufficient independent grounds for rejecting this alternative.

V. STATEMENT OF OVERRIDING CONSIDERATIONS

The Commission finds that, notwithstanding the imposition of all feasible mitigation measures, significant impacts related to Historic Resources will remain significant and unavoidable and in accordance with CEQA Guidelines Section 15092(b)(2)(B), such remaining impacts are acceptable to the overriding considerations described below. In accordance with CEQA guidelines Section 15093, CEQA Section 21081(b), and Chapter 31 of the San Francisco Administrative Code, the Commission hereby finds that each of the specific economic, legal, social, technological, and other considerations, and the benefits of the Project separately and independently outweigh the remaining significant, adverse impact. The remaining significant adverse impact identified is acceptable in light of each of these overriding considerations. Any one of the reasons for approval cited below is sufficient to justify approval of the Project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the Commission will stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this Section, and in the documents found in the Record of Proceedings, as defined in Section I.

On the basis of the above findings and the substantial evidence in the whole record of this proceeding, the Commission specially finds that there are significant benefits of the Project in spite of the unavoidable significant impacts, and therefore makes this Statement of Overriding Considerations. The Commission further finds that, as part of the process of obtaining Project approval, all significant effects on the environment from implementation of the Project have been eliminated or lessened where feasible. All mitigation measures proposed in the Final EIR for the proposed Project and determined to be feasible by these findings are adopted as part of this approval action.

The Project would result in the following benefits:

- Increase the amount of athletic play time on the Beach Chalet Athletic Fields by renovating the existing athletic fields and adjacent warm-up areas.
- Improve public access to the Beach Chalet Athletic Fields by adding new pathways, increasing the size of the existing parking lot, providing a formal drop-off area, and providing bicycle racks.
- Increase ground-sports athletic opportunities on the north side of San Francisco commensurate with improvements elsewhere in San Francisco.
- Provide a safe, optimal recreation facility and amenities for athletes, spectators, and park users by renovating the existing Beach Chalet Athletic Fields and the existing restroom building, adding bleachers, and installing a new plaza area with visitor amenities.
- Reduce ongoing maintenance and resource needs.
- Comply with current Americans with Disabilities Act (ADA) requirements.
- Improve safety and increase nighttime use of the west end of Golden Gate Park by installing new lighting and bringing more recreation facility users to the area.

- Remain consistent with the *Golden Gate Park Master Plan*.

Having considered the information included above as well as information in these Findings and elsewhere in the administrative record, the Commission finds, determines, and concludes that benefits of the Project outweigh the unavoidable adverse environmental effects, and that the adverse environmental effects therefore are acceptable.

DECISION

That based upon the Record, the submissions of the Project Sponsor, the staff of the Department, the SFRPD, and other interested parties, the oral testimony presented to this Commission at the public hearings, and all other written materials submitted by all parties, the Commission hereby **ADOPTS** findings under the California Environmental Quality Act, including rejecting alternatives as infeasible, amending a mitigation measure as infeasible, adopting a Statement of Overriding Considerations, and **ADOPTS** a Mitigation Monitoring and Reporting Program (MMRP) , attached as Exhibit A.

I hereby certify that the Planning Commission ADOPTED the foregoing Motion on May 24, 2012.

Linda D. Avery
Commission Secretary

AYES: Commissioners Fong, Wu, Antonini and Borden

NAYS: Commissioner Moore

ABSENT: Commissioners Miguel and Sugaya

ADOPTED: May 24, 2012

MITIGATION MONITORING AND REPORTING PROGRAM (Including the Text of the Adopted Mitigation Measures)

Adopted Mitigation Measures	MONITORING AND REPORTING PROGRAM				
	Responsibility for Implementation	Mitigation Schedule	Mitigation Action	Monitoring/Reporting Responsibility	Monitoring Schedule
BIOLOGICAL RESOURCES					
<i>Mitigation Measure M-BI-1: Pre-Construction Bat Surveys</i>					
<p>Conditions of approval for building and grading permits issued for demolition and construction within the project site shall include a requirement for pre-construction special-status bat surveys when large trees are to be removed. If active day or night roosts are found, the bat biologist shall take actions to make such roosts unsuitable habitat prior to tree removal or building demolition. A no-disturbance buffer of 100 feet shall be created around active bat roosts being used for maternity or hibernation purposes. Bat roosts initiated during construction are presumed to be unaffected, and no buffer would necessary.</p>	SFRPD	<p>Prior to tree removal. The period between surveys and tree removal of potential habitat trees should occur only: (i.) 24 hours after night emergence surveys establish that no bats are present, or; (ii.) during months when bats are active which is approximately between March 1st, or when heavy rains cease and/or night temperatures are above 45F, and April 15th, when females begin giving birth to pups and between August 15th, after pups are self-sufficiently volant, and October 15th, or when heavy rains begin and night temperatures are below 45F.</p>	<p>Pre-construction special-status bat survey; establishment and implementation of buffers</p>	<p>Sponsor to provide Environmental Review Officer (ERO) with bat survey results prior to tree removal</p>	<p>Considered complete upon receipt of bat survey report and establishment of buffers</p>

MONITORING AND REPORTING PROGRAM

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Mitigation Action	Monitoring/Reporting Responsibility	Monitoring Schedule
<p><i>Mitigation Measure M-BI-3: Plant Replacement Trees</i></p> <p>The San Francisco Recreation and Park Department (SFRPD) shall replace the trees removed within SFRPD-managed lands with trees of equivalent ecological value (i.e., similar species providing the same general microhabitat characteristics for wildlife species) to the trees removed. If trees of equivalent ecological value are not feasible or available, removed trees shall be replaced at a ratio of 1 inch for 1 inch of the diameter at breast height of the removed tree. SFRPD shall monitor tree replacement plantings annually for a minimum of three years after completion of construction to ensure establishment of the plantings and, if necessary, shall replant to ensure the success of the replacement plantings.</p>	SFRPD	During construction activities and for a minimum of three years after replacement trees have been planted	Plant replacement trees and monitor tree replacement plantings annually for a minimum of three years	Sponsor to provide Environmental Review Officer (ERO) with tree replacement plan	Considered complete three years after completion of construction
CULTURAL RESOURCES					
<i>Mitigation Measure M-CP-1: Circulation Paths</i>					
<p>The circulation paths shall be redesigned to include a more naturalistic and compatible surface material such as decomposed granite, NaturePave (a decomposed granite product with a resin binding agent), or compacted earth in place of the proposed concrete surface materials if such redesign can be accomplished while still meeting all applicable accessibility requirements. The paths shall also be redesigned to consider a more informal path edge treatment such as a ‘soft’ planted edge if such redesign can be accomplished while still meeting all applicable accessibility requirements. The SFRPD shall determine the feasibility of using these alternate materials and edge treatments in consultation with the Mayor’s Office on Disability.</p>	SFRPD	During construction activities if determined feasible by Commission and Mayor’s Office of Disabilities (MOD)	Design circulation paths with more naturalistic material if feasible	SFRPD and MOD	Considered complete upon issuance of building permit
HAZARDS AND HAZARDOUS MATERIALS					
<i>Mitigation Measure M-HZ-2: Hazardous Building Materials</i>					
<p>The project sponsor shall ensure that, before renovation, the restroom building is surveyed for hazardous building materials, including PCB-containing electrical equipment, fluorescent light ballasts containing PCBs or DEHP, and fluorescent light tubes containing mercury vapors. These materials shall be removed and properly disposed of before commencement of demolition or renovation. Old light ballasts that will be removed during renovation shall be evaluated for the presence of PCBs, and in the case where the presence of PCBs in the light ballast could not be verified, they will be assumed to contain PCBs, and handled and disposed of as such, according to applicable laws and regulations.</p>	SFRPD	Prior to any demolition activities	Properly remove and dispose of hazardous building materials	Project sponsor/contractor shall submit a Monitoring Report, detailing survey results and compliance with the specified measure, to SFDPH for approval after construction. Copies the report shall be sent to the SFRPD and the Planning Department	Considered complete upon agency receipt of SFDPH-approved Monitoring Report