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Th15c

Prepared May 8, 2013 for May 9, 2013 Hearing

To: Commissioners and Interested Persons
From: Charles Lester, Executive Director
Dan Carl, North Central Coast District Director
Kevin Kahn, Coastal Planner
Subject: **STAFF REPORT ADDENDUM for Th15c**
Appeal Number A-2-SNF-12-020 (Beach Chalet)

The purpose of this addendum is to supplement the recommended findings and respond to certain points raised by the Applicant after publication of the staff report (via letter dated May 2, 2013 – see attached). The purpose is also to change certain recommended special condition requirements related to the use of concrete surfacing, landscaping between the parking lot and field area, and bollard lighting. The findings below are hereby incorporated by reference into the relevant sections of the staff report dated April 26, 2013 and would appear as Commission findings rather than staff statements if adopted by the Commission.

1. Context for Staff Recommendation

The issues in this appeal primarily involve qualitative judgments about what is “naturalistic” as referenced by the LCP. The City of San Francisco LCP lacks explicit specificity on this point, and staff has looked to the record and site observations to make these judgments. It is clear that reasonable people can and do disagree on this matter, and staff recognizes that the City/Applicant, as well as some others, have come to an opposite conclusion of what should be considered naturalistic in this case. The following is provided as additional explanation of staff’s recommendation.

For staff, the key consideration in this respect is the way in which the proposed project would redefine the character of the athletic field space from something that is more an open grassy field with intermittent visitor use features (such as goal posts and periodically striped soccer fields)¹

¹ As described in the staff report (e.g., see staff report page 15), the baseline for this analysis is the site as it existed prior to unpermitted fencing and related improvements. Staff notes that the Applicant states the City’s charter (i.e., LCP) exempts such development from coastal permit requirements. However, the only development that is exempt from coastal permit requirements is that as identified in the Coastal Act and its implementing regulations, including as may be reflected in an LCP. In this case, the cited LCP section purports to exempt “Rec and Park Dept. play structures, maintenance, and any other Park and Rec activity that requires no building permit”, but such exemption can only be understood in terms of the Coastal Act and its implementing regulations, and this project would not meet such exemption tests. Thus, no such exemption applies, and the City’s charter cannot independently exempt such development from coastal permit requirements.

surrounded by woodland, to something that changes the open field setting into something more rigidly organized, confined, and defined in relation to edge elements (e.g., fencing, spectator seating areas, linear trails, etc.) but particularly in relation to improvements in the middle of the fields area itself (e.g., concrete central aisle, central seating, interior field lighting, etc.). Also relevant, in staff's view, are the improvements along the east of the field area itself (e.g., plaza, play and picnic areas) which would introduce significantly more formal and less naturalistic edge elements. Thus, staff's recommendation.

Staff does not agree that staff's recommendation is akin to a denial recommendation. The recommended conditions of approval would provide for the field expansion the City proposes, as well as the expanded parking lot, plaza, play and picnic areas, but would not include synthetic turf and field fencing, and would only allow field lighting on the perimeter of the fields area. The main objective of staff's recommendation in this respect is to avoid segmenting the main open space field area and to avoid it appearing as something that is not naturalistic, including with respect to synthetic turf with permanent colored lines for multiple sports and multiple field configurations (as opposed to the current application of chalk striping for three fields when in play), and including with respect to edge of field developments (e.g., plaza, play and picnic areas). Staff agrees that the fields area should be improved; the question is how.

2. Identifying an Approvable Project

The central applicable LCP policy relates to that portion of LCP Objective 3 Policy 1 (for Golden Gate Park) that states: "Emphasize the naturalistic landscape qualities of the western end of the park for visitor use." The Applicant takes issue with the way in which the staff report interprets and applies this policy to the proposed project, including alleging that staff's report and recommendation does not accurately reflect the field area's character, that staff's intent is to prioritize naturalistic landscape qualities as "a reflection of [staff's] own personal priorities" as opposed to the LCP, and that staff interpretation of this policy "is entirely subjective".

As discussed in the staff report on page 16, the term "naturalistic landscape qualities" is not defined in the LCP. Staff looked to LCP certification documents as a means of helping determine the intended meaning of this policy, and these documents describe requiring protection for the "essential design elements that give the Park its unique landscape character", and, in the only "naturalistic" reference, describe "the establishment of designated naturalistic parkland areas to protect the pastoral character of the Park". From these references and the policy language itself, staff concluded that the intent for the LCP policies requiring that 'naturalistic landscape qualities be emphasized for visitor use' is based on ensuring protection of the pastoral landscape character of the Park for visitor use. In other words, the LCP requires protection of both the park's visitor use and naturalistic landscape qualities. Thus independent of any LCP intent, LCP Objective 3 Policy 1 expressly protects dual functions: visitor use *and* naturalistic landscape. While indeed the fields have been used for recreational athletic purposes since the 1930s, they are also meant to act as a naturalistic respite amidst the urban city. Development within the field area is not meant to be an either/or endeavor; any proposal to renovate the fields must protect both of its functions.

As described beginning on staff report page 15, Staff then looked to the City's own findings to help identify and understand the relevant characteristics of the project area in that regard. Because the most developed description of such characteristics (and the effect of the project on

them) was found in the City's historic and cultural resource-related findings, because the historicity of Golden Gate Park and the athletic fields site is an important contributor to site character, and because the LCP certification documents call for protection of notable Park landmarks and features that provide continuity with the past,² staff's analysis was informed by such findings in helping to understand both site character and the ways in which the proposed project would impact such character. As the City's finding state:³

*The Department concurs with ESA's description of the Beach Chalet Athletic Fields character-defining features described on pages 40-43 of their report. The features in brief [for the Beach Chalet Athletic Fields] are: Spatial Organization, Topographic Characteristics, Vegetation Features, Buildings and Structures, Circulation Features.*⁴

The City then goes on to identify the ways in which such character would be affected by the proposed project:

Department staff concurs with the analysis provided by ESA's HRER, pages 44-59. In brief, staff finds that the following aspects of the Project would cause significant and unavoidable impacts to the Athletic Fields:

Spectator seating - The installation of spectator seating would alter the character-defining spatial organization of the Athletic Fields by disrupting the expansive plane of the fields. The seating would bisect and 'bookend' the open field area with permanent concrete structures. They would also contrast significantly with the surrounding landscape in terms of form, features, materials, texture, and color.

Synthetic turf - The replacement of the natural turf field with synthetic turf would remove a character-defining feature of the Athletic Fields and replace it with an incompatible material that is not vegetation and that does not adequately match the color and texture of natural turf.

Concrete paths - The installation of new concrete paths would alter the onsite circulation in a manner that would detract from the informal unpaved paths that characterize the Athletic Fields. The new paths would be incompatible in terms of surface treatment, width, edge treatment, and materials.

Field lighting - The installation of field lighting would alter the character-defining spatial organization and land patterns of the Athletic Fields by introducing a large-scale modern element that is incompatible with the informal and naturalistic character of the fields.

The City's findings speak for themselves regarding the effect of the proposed project on site character. These findings find amplification in the City's referenced HRE document, of which the portion related to the athletic fields (from the HRE "Impacts Identification" section) is

² See Objective D.3, Policy B on staff report page 16.

³ Per City of San Francisco's Historic Resource Evaluation Response dated July 27, 2011 (HRER), p.4.

⁴ Note the reference to the ESA report is to the report titled Beach Chalet Athletic Fields Renovation City and County of San Francisco Final Historic Resources Evaluation (HRE) (ESA July 2011)

attached to this addendum.⁵ These findings are persuasive in terms of both identifying site character, as well as the way in which the proposed project would impact that character. Staff's recommended conditions attempt to avoid some – not all – of these impacts. Still, there is some qualitative judgment in striking the balance between respecting site character for visitor use at the same time as site character as a naturalistic landscape. Again, reasonable people can and do disagree, and judgment is involved meeting the LCP policy to emphasize naturalistic landscape qualities for visitor use.

3. Response to Applicant Comments

The Applicant's May 2, 2013 letter includes a response to the staff report that includes a number of observations requiring comment and/or clarification as follows.

Golden Gate Park Master Plan

The City indicates that staff "ignores" the Golden Gate Park Master Plan's (GGPMP) references to the Beach Chalet fields area as a "major recreation area", and that staff didn't adequately evaluate LCP Policy 3.3 directing the City to prepare such a plan to guide activities in this part of the park. As the City acknowledges, the GGPMP is not a part of the LCP, and thus is not a standard of review for the proposed project. The GGPMP can provide non-binding guidance to decision makers, but it does not carry the force of law for coastal permit decisions. As a result, it was not discussed in the staff report.

In addition, staff believes that the recommendation appropriately harmonizes with the GGPMP. As the City indicates in their letter, the GGPMP identifies this area as a major recreation area where "emphasis should be placed on improving and maintaining existing recreation facilities, rather than adding new ones", and identifies a series of recommendations that apply to the Beach Chalet fields (including to "upgrade irrigations systems" "because the lack of drainage systems under some fields makes maintenance difficult after rains", and "install drainage systems where needed"). Staff's recommendation recognizes that the fields are to be emphasized for visitor use, just as the GGPMP does, and recommends approval of a project to improve the fields as the GGPMP would suggest. Contrary to the City's statements that such an approved project would result in "Golden Gate Park's west end being devoid of activity centers", the existing facility would be substantially improved under staff's recommendation, and it is hard to see how this results in anything more than an increase in visitor use activity in this area (as also discussed above).

Finally, the City perhaps puts it best when they state that "one of the purposes of the Golden Gate Park Master Plan is to help the City balance pastoral and active recreation when implementing park maintenance and improvements." Staff's recommendation is meant to strike that balance, and there is no indication that the non-binding guidance offered by the GGPMP would result in any different outcome. As discussed above, reasonable people can disagree on the balance point, but the policies of the GGPMP harmonize, and are not inconsistent with, staff's recommendation based on its judgment of the facts of this case.

⁵ HRE pages 46-49 and 52-57.

Existing Setting

With regard to the City's observations that staff "misrepresents" the existing setting, including indicating that staff's observation that "the fields area is a grassy area framed by trees and vegetation that is perceived as a pastoral open space used for recreational pursuits" finds "no basis in reality for that statement other than statements made by the Appellants," staff looked to the City's own approval documents to help identify the setting and impacts to it. From the City's record and own findings, and from staff site visits, it was apparent to staff that perhaps the defining feature of the fields facility is the spatial organization. As summarized on staff report page 15:

The fields area is a grassy area framed by trees and vegetation that is perceived as a pastoral open space used for recreational pursuits with a small restroom. It is this spatial organization and the natural landscape that most clearly reflects the character of the site.

Such finding reflects and is consistent with the City's finding in the 2011 HRE (see page 46 of portion attached), which states:

The spatial organization of the Beach Chalet Athletic Fields is considered a character defining feature. The organization is made up of two primary components; an expansive plane (the fields) and surrounding woodland along its north end and east side and by bands of mature vegetation on its south end and west side. This spatial organization—the field surrounded by trees—gives the field area the appearance of being set within the park's woodland. The central feature within the landscape is the field area, which is an opening in the woodland that covers approximately 8.5 acres.

With respect to the City's observations that the existing unpermitted fencing needs to be countenanced for the setting as it is exempt from coastal permit requirements, this is incorrect (as described above). As described in the staff report, the baseline for the coastal permit review is an analysis as if the fence weren't there because it is not permitted.

Historic Status and Context

The City indicates that the City's historic resource analysis cannot be used as the LCP includes no historic resource policies, and that staff did not mention that the City's historic resource evaluation concluded that the status of Golden Gate Park overall as a National and California Registers of Historic Places Historic District would not be affected. On the latter, as the City's 2011 HRER states:

While the Project would adversely impact a character-defining feature of Golden Gate Park Historic District, the Project would not have a significant adverse impact to the historic district as a whole since the overall integrity of the park would remain sufficient to convey the resource's historical significance.⁶

Staff concurs that the City's historic resource analysis concluded the proposed project would lead to the Beach Chalet fields area no longer being a contributor to the recognized Golden Gate Park Historic District, but that the City concluded that even with that loss, there were hundreds

⁶ 2011 HRER p.6.

on other contributing factors and it wouldn't affect the overall characterization of Golden Gate Park as a Historic District.

With respect to applying historic resource information to the LCP evaluation, staff notes that such information was not used in terms of finding LCP historic resource conformity. Rather, and as identified above, such information was simply used to help define the character of the site. Because the most developed description of such characteristics (and the effect of the project on them) was found in the City's historic and cultural resource-related findings, because the historicity of Golden Gate Park and the athletic fields site is an important contributor to site character, and because the LCP certification documents call for protection of notable Park landmarks and features that provide continuity with the past, staff's analysis was informed by such findings in helping to understand both site character and the ways in which the proposed project would impact such character (see also above).

City LCP Conformance Findings

With respect to the City's process, although the City performed an exhaustive analysis of the project, the portion of that analysis applicable to conformity with the LCP is somewhat limited, including with respect to key Policy 3.1. On this point, the City's EIR evaluation indicates:

The proposed project would be generally consistent with the policy that encourages visual and physical connection between the park and the beach as it would improve the public access between Beach Chalet Athletic Fields and the beach, as well as improve security, encouraging visitors. It would also improve the site's function as a recreational resource by increasing the amount of potential play hours at the site, introducing spectator seating, renovating the restroom building to serve more park users, provide a higher quality facility and meet ADA standards, meet the latest water efficiency standards, and providing a small playground that would allow greater use of the facility by the public. Although some trees would be removed to accommodate the project, they would be replaced at a ratio of at least 1 to 1; thus, the project would not be in conflict with this policy. However, the project would not emphasize the naturalistic landscape qualities at the western portion of the park, as the project site is located within areas designated for active recreation.⁷ (Emphasis added)

The evaluation thus appears to conclude that naturalistic landscape qualities and visitor use are incompatible. Similarly, the City's Planning Commission's finding related to this Policy 3.1 states:

The rehabilitation of the Beach Chalet Athletic Fields does not introduce a new use into Golden Gate Park; rather the project is a renovation of the existing facilities to allow continuation of existing park amenities and uses. As such, the naturalistic landscape qualities around the athletic fields and around the perimeter of the Park would remain intact. The project does propose removal of 16 trees; however each tree removed would be replaced at a ratio of one-to-one or greater. The proposed tree replacement is consistent with emphasizing the natural landscape qualities of the Park and also the need for continued reforestation of the Park's aging tree population.

⁷ DEIR p. III-4.

In short, the City's conformity finding is based on the project being for the same use at a renovated existing facility, where the observations about "naturalistic landscape qualities" are limited to the area around the athletic fields (and the perimeter of Golden Gate Park) as opposed to the fields themselves and the way in which the overall area is perceived. The City's finding doesn't elaborate on the way in which the two parts of the policy are to be harmonized.

Field Lights Height

The City states that the staff report statement that "the City-approved lights would extend above the tops of the tallest trees surrounding the athletic fields to a height of 60 feet"⁸ is not correct. However, the banks of field lights would extend 60 feet above the ground. The City appears to imply that staff intends to say that the lights would extend 60 feet *above* the trees, but that is not what the statement means. Staff and the City appear to agree that the proposed lights would extend to a height of 60 feet from the ground, and that this height is higher than the surrounding trees. Related, the City indicates that "trees in these areas are will be taller than the poles once installed", but staff is not aware of any evidence on this point.

Field Striping

The City states that the fields are striped now for field play, and thus that staff's conclusion that artificial turf with striping diminishes the naturalistic illusion is in error (see staff report discussion on this point on staff report page 21). The City appears to be arguing that because the fields are striped now and would be striped under the proposed project, there is little difference between the way in which striping affects the existing fields as compared to the proposed fields.

Staff understands that the fields are currently striped with white chalk when in play for three soccer fields. Such chalk can be prominent when first applied, but its visibility diminishes over time (with use, rain, etc.), and eventually disappears altogether, especially when the fields aren't in play. For staff, this represents the baseline against which to compare the striping program envisioned by the proposed project. In contrast, the proposed project would include permanent striping for four soccer fields and four lacrosse fields on top of one another (extending east-west), and permanent striping for eight smaller fields (extending north-south) with two on each of the larger soccer/lacrosse fields. To be able to distinguish the various fields and sports, the striping would be multiple colors. On top of this, the proposed artificial turf would be confined within very structured rectangles, would be edged by linear seating areas, fencing, and a central concrete walkway. Thus, the naturalistic illusion that one might have related to a green carpet of artificial turf (to replace the existing natural turf in the same general area) is thus impaired by the way in which the fields would be broken up, fenced, and striped.

Park and Beach Connection

The City indicates that staff took issue with the center concrete walkway without recognizing that it would meet other LCP objectives for enhancing the recreational connection, and strengthening the visual and physical connection, between Golden Gate Park and the beach. Staff agrees that such a central walkway could be used to meet such LCP objectives, but disagrees that that is the way to meet such objectives in this case. The central concrete walkway fundamentally breaks up the spatial organization of the fields area in a way that compromises its character (see staff report discussion beginning on page 24). These other LCP objectives are furthered by the trail component of the project that will facilitate the connection between the beach and the Park,

⁸ Staff report p. 18.

and these are appropriate in this case as meeting these objectives as they can be better harmonized with Policy 3.1 than the central concrete barrier. In all cases, additional improvements are needed at the Great Highway itself to better connect the Park to the beach.

Tree and Shrub Locations

In terms of the landscape plan, staff recognizes that the proposed project includes substantial landscaping, and identifies this as reason why the appeal reforestation contentions are not substantial (see staff report page 23). At the same time, staff identified that the location of the trees and shrubs raised concerns, but such observation was only in terms of the way in which such locations were premised by the design features that were problematic (i.e., engineered edges of seating, plaza, play, picnic, and trail areas), and not by the landscaping itself. As identified in Special Condition 1j (staff report page 8), such landscaping would instead be required to be curvilinear to emphasize the naturalistic landscape qualities of the site.

4. Changes to Conditions:

Decomposed Granite and Parking Lot Vegetated Screen

Recommended Special Condition 1 requires the use of “decomposed granite or similar product that appears as decomposed granite (e.g., decomposed granite mixed with binding agents, such as GraniteCreek product)” for the pedestrian pathways and play and picnic areas, and the same requirement for the access to the site from the parking lot as well as to the plaza area surrounding the restroom plaza and “if feasible, but may be surfaced with wood (e.g., wood decking) or a harder surface (such as colored concrete) if required to accommodate the level of use associated with the restroom and plaza, and if the wood/harder surface materials blend with the natural setting.”

With respect to the pedestrian pathways, the City indicates it intends to use a product similar to the GraniteCreek product,⁹ and thus staff and the City appear in agreement on that aspect of the conditions.

With respect to using colored concrete for the access from the parking lot to the proposed plaza, as well as for the plaza, picnic, and play areas, the City makes a compelling case that these areas need to be concrete so as to address safety and ADA issues. Staff believes that these areas meet the criteria identified in the condition, that they are confined along one side of the field area and near the parking lot, and are thus adequately distinguishable from the main fields area in way that would allow colored concrete to effectively appear naturalistic in the overall context of the site.

Similarly, the City makes a valid public safety case that separating the parking lot from the fields area through a vegetated screen could lead to public safety issues. The intent of this aspect of the conditions was to help separate the two areas and thus more clearly emphasize the naturalistic landscape qualities, but staff believes that the City makes a compelling public safety argument that argues for a slightly different balancing of the two aspects of Policy 3.1. Thus, staff changes

⁹ GraniteCreek is a product with which the Commission is familiar, including recent application in the Pleasure Point Parkway project in Santa Cruz. This product appears as decomposed granite, but it includes binding agents to help ensure its rigidity and approved configuration even under significant use.

the staff recommendation to modify the decomposed granite and parking lot screening requirements for those areas in Special condition 1 as follows:

g. Parking Lot. ~~Access from t~~The parking lot area shall be screened from view as seen from the field, restroom, plaza, play, and picnic areas as much as possible through planting new vegetation, with access from the parking lot to these areas limited to a pedestrian pathway access at the south end of the parking lot through the vegetation, and a main access (located along the existing accessway location) into these areas where the main access is subject to the same surfacing requirements as apply to the plaza area (see below).

h. Restroom, Plaza, and Surrounding Areas. The pavement surrounding the restroom that exists without benefit of a CDP shall be eliminated from the project and removed. ~~The restroom and plaza area shall be separated from the parking lot area through a vegetated screen.~~ The plaza area shall be reconfigured so that it appears as a curvilinear and naturalistic form, and not as a straight line or circular form; shall be limited in size to what will not detract from the spatial relationship between the fields and restroom building; and shall be sited and designed to conform to site topography as much as possible, except where some minor elevation nearest the fields would help avoid the need for fencing (see also fencing condition). The plaza area shall be surfaced with ~~decomposed granite or similar product that appears as decomposed granite (e.g., decomposed granite mixed with binding agents, such as GraniteCreek product) if feasible, but may be surfaced with wood (e.g., wood decking) or a harder surface (such as colored concrete) if required to accommodate the level of use associated with the restroom and plaza, and if the wood/harder surface materials where such~~ harder surface shall be required to blend with the natural setting.

i. Play and Picnic Areas. The play and picnic areas shall be reconfigured so that they appear as a curvilinear and naturalistic forms integrated into and with the surrounding vegetation, and not as a straight line or circular form; and shall be sited and designed to conform to site topography as much as possible, except where some minor elevation nearest the fields would help avoid the need for fencing (see also fencing condition). The play and picnic areas shall be surfaced subject to the same surfacing requirements as apply to the plaza area (see above) except that rubber playground matting consistent with site character is allowed in the playground areas with decomposed granite or similar product that appears as decomposed granite (e.g., decomposed granite mixed with binding agents, such as GraniteCreek product). All play and picnic area amenities shall be sited and designed in such a way as to emphasize the naturalistic landscape qualities of the site (including through use of natural materials, muted colors, amorphous (as opposed to in pattern) locations, etc.).

j. Landscaping.

a. Proposed and Augmented. Proposed landscaping shall be sited and designed to emphasize the naturalistic landscape qualities of the site, and shall be supplemented as necessary to address the requirements of this Revised Project Plans condition. In particular, landscaping shall be augmented along the northern, western, and southern edges of the field area in such a way as to result in a curvilinear as opposed to a straight-line form, and to help provide a natural barrier to catch wayward balls. Landscaping shall also be augmented along the eastern side of the field area to provide visual separation between ~~the parking lot and the rest of the site, and between~~

the field area and the restroom/plaza and play/picnic areas, all sited and designed in such a way as to result in a curvilinear as opposed to a straight-line form, and to help provide a natural barrier to catch wayward balls.

Lighting

With respect to field lighting, staff's recommended Special Condition 1b allows for perimeter field lighting integrated with perimeter vegetation (i.e., near the tree line). From the City's comments, it appears that this condition may have been interpreted as a prohibition on all field lighting. If so, that conclusion is incorrect. The lighting that breaks up the fields spatial organization (interior to the field), is the lighting which staff believes needs to be removed to meet LCP conformity. However, other field lighting substantially in conformance with that proposed is allowed on the perimeter of the open field area under this special condition.

With respect to other lighting, Special Condition 1f includes a requirement to use "low (i.e., bollard-mounted) fixtures where fixtures are needed if possible." The City makes a compelling case that such fixtures may not meet public safety requirements, and aren't consistent with Golden Gate Park lighting otherwise. Thus, staff changes the staff recommendation to modify the bollard lighting requirement in Special condition 1 as follows:

- f. Lighting. Lighting shall be limited to the minimum lighting necessary for pedestrian and vehicular safety purposes associated with use of the athletic field facility, including through the use of as low as possible ~~(i.e., bollard-mounted)~~ fixtures, where fixtures are needed, if possible where such fixtures shall be consistent with other lighting fixtures in Golden Gate Park. All allowed lighting shall be downward directed and designed so that it limits the amount of light or glares visible from both on and off site to the maximum extent feasible. Lighting plans shall be submitted with documentation associated with chosen lighting features demonstrating compliance with this condition.

Alterations to the Beach Chalet Athletic Fields Cultural Landscape

Spatial Organization

The spatial organization of the Beach Chalet Athletic Fields is considered a character defining feature. The organization is made up of two primary components; an expansive plane (the fields) and surrounding woodland along its north end and east side and by bands of mature vegetation on its south end and west side. This spatial organization—the field surrounded by trees—gives the field area the appearance of being set within the park’s woodland. The central feature within the landscape is the field area, which is an opening in the woodland that covers approximately 8.5 acres.

In terms of CEQA’s definition of material impairment, the revisions to the spatial organization of the field that would result from inserting new spectator seating would alter in an adverse manner a character defining feature that conveys the Field’s historical significance and justifies its inclusion in the National Register (and therefore the California Register) as a contributor to the Golden Gate Park National Register Historic District.

In terms of the Secretary’s Standards, the Secretary of the Interior’s Standards with Guidelines for the Treatment of Historic Landscapes (NPS, 1996) provide the following applicable guidance about alterations to spatial organization. In general, the alterations to the spatial organization would not meet the recommendations set forth by the NPS, as described below.

Recommended: Designing new features when required by the new compatible use to assure the preservation of the historic spatial organization and land patterns.

Not recommended:

- Adding a new feature that detracts from or alters the spatial organization and land patterns.
- Placing a new feature where it may cause damage to, or be intrusive in spatial organization and land patterns.
- Introducing a new feature that is visually incompatible in size, scale, design, materials, color and texture.
- Removing historic features which are important in defining spatial organization and land patterns.

Discussion: The insertion of spectator seating into the center, northern, and southern ends of field area would alter the spatial organization of the field as an expansive plane. This open, expansive plane would be interrupted by the placement of the center stands, in particular, by bisecting the open field area into two halves. The placement of seating at the northern and southern ends would ‘bookend’ the currently open field with new seating structures. These new features would detract from the spatial organization of the field, would be an intrusive new element to the field, and would be visually incompatible in terms of size, scale, design, materials, color and texture.

The alterations to the spatial organization of the fields would have a significant impact to historic resources under the CEQA definition of material impairment, and would not meet the general recommendations provided in the Secretary of the Interior's Standards with Guidelines for the Treatment of Historic Landscapes. As such, this component of the proposed project would have a significant impact on the environment. Since there are no mitigation measures that would meet the objectives of the proposed project while maintaining the open, expansiveness of the field (as a substantial amount of spectator seating is a requirement of the project), this impact would be considered significant and unavoidable. Only selection of a no-project alternative would avoid the impacts of the proposed project.

Topographical Characteristics

The topographical characteristics of the Beach Chalet Athletic Fields consists of the contrast between the graded field area and the surrounding "unaltered" appearance of the topography of the park—the sloping hillsides to the north and east and the slight decline to the west. The proposed project would maintain these topographic characteristics, with only a small amount of grading proposed for the northeast corner of the field for the warm up area and trail connection to the Beach Chalet (see Figure 3). The overall topography of the site would be minimally altered, and would retain the contrast between the graded field surrounded by the sloping hillsides. The proposed project would meet the Standards for protecting and maintaining historic topographical characteristics, and no significant impact to the fields' topographic characteristics would occur.

Vegetation Features

Synthetic Turf

The natural turf (grass) is considered a character defining vegetation feature of the Beach Chalet Athletic Fields. Under the proposed project, the natural turf would be replaced by synthetic turf to allow for increased recreational use, reduced maintenance costs, and longer play times on the field. In terms of CEQA's definition of material impairment, the replacement of natural turf with synthetic turf would alter in an adverse manner a character defining feature that conveys the Field's historical significance and justifies its inclusion in the National Register (and therefore the California Register) as a contributor to the Golden Gate Park National Register Historic District.

In terms of the Secretary's Standards, the Secretary of the Interior's Standards with Guidelines for the Treatment of Historic Landscapes (NPS, 1996) provide the following applicable guidance about the rehabilitation of historic vegetation. In general, synthetic turf would not meet the recommendations set forth by the NPS, as described below.

Repair Historic Features and Materials

Recommended: Rejuvenating historic vegetation by corrective pruning, deep root fertilizing, aerating soil, renewing seasonal plantings and/or grafting onto historic genetic root stock as applicable.

Not recommended: Replacing or destroying vegetation when rejuvenation is possible.

Discussion: The Standards call for retention of historic vegetation and rejuvenating it, rather than replacement or destruction of the material. Since rejuvenation of the existing natural turf is possible (but would not meet the durability requirement that is a critical for extending playing time on the fields), replacement with a synthetic material would not meet this standard.

Replace Deteriorated Historic Materials and Features

Recommended: Using physical evidence of composition, form, and habit to replace a deteriorated, or declining, vegetation feature. If using the same kind of material is not technically, economically, or environmentally feasible, then a compatible substitute material may be considered.

Not recommended: Removing deteriorated historic vegetation and not replacing it, or replacing it with a new feature that does not convey the same visual appearance.

Discussion: The Standards call for replacement of a compatible substitute if using the same kind of material is not technically, economically, or environmentally feasible. In this case, using the same kind of natural turf to replace the existing deteriorated turf is feasible, but does not have the same technical or economic advantages that a synthetic turf replacement material has as required under the proposed project's objectives for longer play. The Standards do allow for replacement of historic vegetation with a new compatible feature that conveys the same visual appearance. Synthetic turf has some properties that are visually similar to natural turf (i.e., color), while other properties do not. For example, the shinier appearance of synthetic turf at a close distance is often discernable from the more flat visual characteristics of natural turf. In terms of texture, synthetic turf, in general, has a texture which is somewhat rougher and more bristly than natural turf, which tends to be softer to the touch. Synthetic turf has a more uniform look compared with natural turf, which has areas of uneven growth or random blade length and spaces of bare dirt or mud. Even in terms of color, however, synthetic turf can be a lighter or brighter shade of green than natural turf, which is darker and more mottled in appearance depending on the time of year or the variety of the turf. Since replacement of the natural turf with other natural turf is technically feasible (it is just would not meet the project objectives), and the visual appearance of synthetic turf is noticeably dissimilar from natural turf at close range, the replacement with a synthetic material would not meet this standard.

Alterations/Additions for the New Use

Recommended: Designing a compatible new vegetation feature when required by the new use to assure the preservation of the historic character of the landscape.

Not recommended: Placing a new feature where it may cause damage or is incompatible with the character of the historic vegetation. Also not recommended is introducing a new vegetation feature in an inappropriate location, which is visually incompatible in terms of its habit, form, color, texture, bloom, fruit, fragrance, scale, or context.

Discussion: The Standards call for compatible new vegetation when required by the new use to assure preservation of the historic character of the landscape. The increased use and longer play under the proposed project's objectives are made possible by the use of synthetic turf. However, such a material would not be considered 'compatible vegetation' since it is not vegetation at all,

but rather, a man-made product that would entirely replace rather than preserve or maintain a character defining feature (i.e., natural turf) of the Beach Chalet Athletic Fields. The Standards also call for the avoidance of new features which may damage historic vegetation or are incompatible with the character of the landscape. As described above, the historic turf would be largely removed (i.e., damaged) and replaced with an incompatible substitute. Finally, the Standards do not recommend alterations that are visually incompatible in terms of its habit, form, color, texture, bloom, fruit, fragrance, scale, or context. Of these factors general vegetation characteristics, only color and texture would apply to the proposed turf replacement. In terms of color, synthetic turf can be a lighter or brighter shade of green than natural turf, which is darker and more mottled in appearance depending on the time of year. In terms of texture, synthetic turf can have a texture which is somewhat rougher and more bristly than natural turf, which tends to be softer to the touch. As such, the replacement with a synthetic material would not meet this standard for alterations or additions.

While none of the examples provided in the Standards address synthetic turf directly, all examples provided are natural/vegetative in character (trees, hedges, plants, etc.) and are not man-made or synthetic, which indicates that such materials would not be an appropriate substitute for historic vegetation.

In conclusion, the replacement of natural turf with synthetic turf would have a significant impact to historic resources under the CEQA definition of material impairment, and would not meet the general recommendations provided in the Secretary of the Interior's Standards with Guidelines for the Treatment of Historic Landscapes. As such, this component of the proposed project would have a significant impact on the environment. Since there are no mitigation measures that would meet the objectives of the proposed project while retaining the natural turf (as synthetic turf is a requirement of the project), this impact would be considered significant and unavoidable. Only selection of a no-project alternative would avoid the impacts of the proposed project.

Trees and Shrubs

The stands of vegetation that surround the field area are character-defining features. Some of the individual trees and shrubs within these character-defining stands would be removed as part of the proposed project. Approximately 16 Monterey cypress and 44 myoporum would be removed. The removed trees and shrubs would be replaced in kind at a 1:1 ratio, which would be consistent with the guidance provided in the Standards. As such, the replacement of Monterey cypress and the myoporum would have a less-than-significant impact on historic resources.

Circulation

The pedestrian circulation patterns consisting of the current informal, unpaved pathways at the northwest corner of the field area and along the field's west side that connect to the surrounding park paths are character defining circulation features of the Beach Chalet Athletic Fields. These existing, informal connections would remain generally unaltered by the proposed project. Retaining and preserving these character defining circulation features would be consistent with the guidance provided in the Standards, and no significant impact to these features are anticipated. Additions to the circulation patterns are discussed below under *Circulation– New Concrete Paths*.

Not recommended: Installing secondary service entrances that are incompatible in size and scale with the historic building or obscure, damage, or destroy character-defining features.

Discussion: The existing open doorways on the west elevation would remain intact and would be used to access the bathrooms as they were historically. The metal security grills which cover these entrances are non-contributing, and can be altered or replaced.

Interior Alterations

The interior of the Restroom Building has been renovated within the past 30 years (outside of the period of significance) and no longer retains integrity. As such, no character defining interior features were identified. Although the interior would be significantly revised, these alterations would have no adverse effect to the Restroom Building as a historic structure. The continued restroom use and new concession use would be compatible with the historic uses of the building.

In conclusion, proposed alterations to the Restroom Building would have a less-than-significant impact to historic resources under the CEQA definition of material impairment, and would generally meet the general recommendations provided in the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. As such, this component of the proposed project would have a less-than-significant impact on the environment. No mitigation measures would be required.

Additions to the Beach Chalet Athletic Fields

Lighting and Fencing

Lighting

The proposed project would include installation of new lighting at the facility. Field lighting would consist of ten 60-foot-tall light standards made of galvanized steel. There would be two light standards each at the north and south ends of the facility that would be oriented toward the two end fields. The other six light standards would be located between the centermost fields and would have back-to-back light fixtures oriented to illuminate the interior fields. The light standards would include shielded lamps, each containing 40 luminaires, with each luminaire containing 1500W MZ lamp types. All lighting would be controlled by an online automated control system, which would allow staff to turn off all the lights at 10:00 p.m. In addition to the field light standards, the project includes 15-foot-tall pedestrian pathway light standards and 18-foot-tall parking lot light standards, which would also be controlled by an online automated control system.

As described above in the Historic Context section, the first known mention of lighting on a Golden Gate Park recreation field occurred in 1920 at the tennis complex. This lighting was later dismantled and the courts currently have no nighttime lighting. Kezar Stadium is currently the only illuminated recreation field within Golden Gate Park. Although the stadium was constructed in 1925, lighting was not added to this facility until 1989. Street lighting throughout the park began in earnest in 1916, and today, there are street lights on most streets within the park, including John F. Kennedy Drive outside of but adjacent to the project site. Most of these lights are replicas installed in the 1990s. Aside from street lights, the Beach Chalet Athletic Fields,

and most of the western end of Golden Gate Park, has no historical precedent with regard to electrical illumination.

The Secretary of the Interior's Standards with Guidelines for the Treatment of Historic Landscapes provide no guidance with regard to the addition of lighting within historic landscapes, specifically. However, the guidelines for additions including structures, furnishings, and objects state that that "new additions should not radically change, obscure, or destroy character-defining spatial organization and land patterns or features and materials." The addition of ten new 60-foot-tall steel lamp poles would be a highly visible new addition to the landscape, not only during the day, but also at night in an area of the park which has been historically dark at night. The addition of new poles and lights would change the character defining land patterns within the Athletic Fields by introducing a large-scale lighting element which is incompatible with the informal and naturalistic character of the fields. Similar to the installation of spectator seating, the addition of new light poles at the center and ends of the field could also alter the spatial organization of the field as an expansive, uninterrupted plane (also see discussion above under *Spatial Organization*).

It is concluded that the substantial amount of new field lighting proposed would have a significant impact to historic resources under the CEQA definition of material impairment because it would alter in an adverse manner the character defining features that convey the property's historical significance and justify its inclusion in the California Register, and would not meet the spirit or intent of the Secretary of the Interior's Standards with Guidelines for the Treatment of Historic Landscapes. As such, this component of the proposed project would have a significant impact on the environment.

Since there are no mitigation measures that would avoid the use of field lighting while meeting the objectives of the proposed project (since the amount of field lighting proposed is a requirement of the project for extended nighttime play), this impact is considered significant and unavoidable. Only selection of a no-project alternative, or an alternative that did not allow nighttime play, would avoid the impacts of the proposed project.

The proposed new lighting for the pedestrian pathways and the parking lot would also introduce new lighting into an area that has been, and is currently, dark at night. This proposed lighting would be substantially smaller and less intrusive than that proposed for the field. The lighting for the parking lot, in particular, would add a new element to an area that is not considered a character defining feature of the landscape. The lighting for the pedestrian pathways would minimally change the character of the area, but would enhance nighttime safety. As such, the introduction of the smaller amount of lighting for the pedestrian pathways and the parking would be acceptable at the project site.

Fencing

The existing 8-foot-tall metal chain link fencing surrounding the athletic fields was added circa 1998 and is not a character defining feature of the landscape. Under the proposed project, this fencing would be removed and replaced with 3.5-foot-tall black vinyl chain link fencing. The areas behind the goals would have 16-foot-tall fencing to ensure that balls remain on the fields. The proposed project would essentially replace one type of non-historic landscape feature with another. While the

lowering of the fence height from 8 feet to 3.5 feet and changing the materials from a bright metallic to a darker vinyl could be seen as a visual improvement, the doubling of fencing heights to 16 feet behind the goals could worsen this condition. Overall, the changes to the fencing could be considered neither deleterious nor beneficial to the historic landscape, but rather, an 'even' trade-off. As such, the alterations to the existing fencing would have a less-than-significant impact on the Beach Chalet Athletic Fields as a historic resource.

Spectator Seating, New Plaza, and Expanded Parking

Other significant additions to the Beach Chalet Athletic Fields includes spectator seating, a new plaza surrounding the Restroom Building, expanded parking, and a maintenance shed. The spectator seating would accommodate up to 1,046 people, and would be located in the northern, central, and southern portions of the field. The new concrete plaza surrounding the Restroom Building would be approximately 775 feet square feet in size, and would include a small playground to the south of the restroom, as well as picnic tables and permanent barbeque pits. Finally, the existing 50-space parking lot would be renovated and expanded by approximately 33% to include a drop-off area adjacent to the location of the existing Restroom Building, and approximately 20 additional parking spaces.

According to the Standards, when alterations to a cultural landscape are needed to assure its continued use, it is most important that such alterations "do not radically change, obscure, or destroy character-defining spatial organization and land patterns or features and materials." The Standards provided the following recommendations when adding new structures into a cultural landscape:

Recommended: Designing and installing a new structure, furnishing or object when required by the new use, which is compatible with the preservation of the historic character of the landscape.

Not recommended:

- Placing a new structure, furnishing, or object where it may cause damage, or is incompatible with the historic character of the landscape.
- Locating any new structure, furnishing or object in such a way that it detracts from or alters the historic character of the landscape.
- Introducing a new structure, furnishing or object in an appropriate location, but making it visually incompatible in mass, scale, form, features, materials, texture or color.

Discussion: The new spectator seating, however, would alter the historic character of the landscape by introducing permanent new structures that are incompatible with the landscape's mass, scale, form, features, materials, texture and color. Seating for over 1,000 people located in three distinct areas on the field would be highly noticeable new elements on the landscape; a landscape which never contained formalized spectator seating during its period of significance or afterwards. Bleacher seating would be made of modern materials (concrete with wood slat seats), would be approximately 3-4 feet tall depending on their location on the field, and would contrast with the form, features, materials, texture, and color of the existing environment. As described above under the heading *Spatial Organization*, the installation of spectator seating would also alter

the spatial organization of the fields by bisecting it into two halves, and 'bookending' the northern and southern ends of the fields, where currently it blends in with the surrounding landscape.

In conclusion, the addition of spectator seating at the Beach Chalet Athletic Fields would have a significant impact to historic resources under the CEQA definition of material impairment because it would alter in an adverse manner the character defining features that convey the property's historical significance and justify its inclusion in the California Register, and would not meet the general recommendations provided in the Secretary of the Interior's Standards with Guidelines for the Treatment of Historic Landscapes. As such, this component of the proposed project would have a significant impact on the environment. Since there are no mitigation measures that would avoid the use of spectator seating while meeting the objectives of the proposed project (since increased seating is a requirement of the project), this impact is considered significant and unavoidable. Only selection of a no-project alternative would avoid the impacts of the proposed project.

Neither the parking lot nor the landscape immediately surrounding the Restroom Building are considered character defining features of the historic landscape. The parking lot, specifically, was constructed in 1968-69, outside of the period of significance, and its expansion of new paved areas would not remove any character defining features of the landscape. The asphalt pavement around the Restroom Building was expanded the 1980s, and replacement of pavement with a concrete plaza would also not remove any character defining features of the landscape. Alterations to these areas would have a less-than-significant impact on Beach Chalet Athletic Fields as a historic resource.

Circulation – New Concrete Paths

The proposed project would alter onsite circulation at the field level by including a new concrete pathway that would encircle the four fields and provide players, spectators, and maintenance staff access to each of the fields, as well as provide connection with existing pedestrian circulation routes within the park and to the pathway at the Great Highway.

In terms of CEQA's definition of material impairment, the installation of new concrete pathways would alter in an adverse manner a character defining feature that conveys the Field's historical significance and justifies its inclusion in the National Register (and therefore the California Register) as a contributor to the Golden Gate Park National Register Historic District. In terms of the Secretary's Standards, the Secretary of the Interior's Standards with Guidelines for the Treatment of Historic Landscapes (NPS, 1996) provides the following applicable guidance about alterations to historic circulation patterns. In general, this portion of the proposed project would not meet the primary recommendations set forth by the NPS, as described below.

Recommended: Designing and installing compatible new circulation features when required by the new use to assure the preservation of historic character of the landscape.

Not Recommended:

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- Placing a new feature where it may cause damage, or is incompatible with the historic circulation.
 - Locating any new circulation feature in such a way that it detracts from or alters the historic circulation pattern.
 - Introducing a new circulation feature which is in an appropriate location, but making it visually incompatible in terms of its alignment, surface treatment, width, edge treatment, grade, materials or infrastructure.

Discussion: The introduction of new, formalized, concrete pedestrian pathways encircling the field and connecting to existing pathways within the park and to the pathway at the Great Highway would be incompatible with the informal and unpaved pathways that currently exist within the historic landscape. While the existing pathways would be largely unaltered, the proposed new pathways would detract from the historic circulation pattern and would be visually incompatible in terms of surface treatment, width, edge treatment, and materials because it would add concrete materials and patterns which are incongruous with the landscape's historic character of a grassy field set within the park's woodland. The paths alone would add approximately one acre of new impervious surface material to the Field.

In conclusion, the alteration to the pedestrian circulation patterns and materials would have a significant impact to historic resources under the CEQA definition of material impairment, and would not meet the general recommendations provided in the Secretary of the Interior's Standards with Guidelines for the Treatment of Historic Landscapes. As such, this component of the proposed project would have a significant impact on the environment.

The impacts from the installation of concrete pedestrian paths that would encircle the Field could be reduced to a less-than-significant level by replacing the paving materials with decomposed granite (DG) or compacted earth, as well as the use of informal edge treatments. In this way, the proposed new circulation paths would blend in with the existing circulation paths, and the visual impact of the new circulation features would be decreased. However, the use of DG or compacted earth for public pathways does not meet the City of San Francisco's code requirements for ADA accessibility, especially for slip-resistance, and is therefore considered an infeasible as a substitute surface material. Other materials should be investigated, such as colored and textured concrete or NaturePave (a DG product with a resin binding agent); however, these materials are a hard impermeable surface and would not reduce the impact of the pedestrian paths on the Informal edge treatment for the paths is also infeasible as a rigid termination point is required for attachment of the synthetic turf to the edges of the Field. As such, the impact is considered significant and unavoidable. Only a no-project alternative would avoid the significant impacts of the proposed project.

Conclusion

The Beach Chalet Athletic Fields Renovation Project would materially impair in an adverse manner many of the character defining features of two contributors to the Golden Gate Park National Historic District; the Beach Chalet Athletic Fields and the Beach Chalet Athletic Fields Restroom Building. Alterations to the Fields, including the addition of synthetic turf, spectator

seating and field lights, would be a significant impact under the CEQA definition of material impairment and would not meet the recommendations provided in the Secretary of the Interior's Standards for the Treatment of Cultural Landscapes. As the addition of synthetic turf, spectator seating and field lights are crucial to the implementation of the proposed project, there are no mitigation measures for these elements which would reduce the level of impact to the less-than-significant level while continuing to meet the objectives of the project. As such, the impact is considered significant and unavoidable. Only a no-project alternative would avoid the significant impacts of the proposed project.

The impacts from the installation of concrete pedestrian paths that would encircle the Field cannot be reduced to a less-than-significant level by replacing the paving materials with pervious substitute materials while meet ADA requirements for slip resistance, and an informal edge is infeasible due to the requirements of the synthetic turf attachment methods. As such, this impact is considered significant and unavoidable. Only a no-project alternative would avoid the significant impacts of the proposed project.

Proposed alterations to the Restroom Building would be minimal, and would be restricted to the minor replacement of three windows with new pedestrian doors to access new interior spaces, and the installation of a new concession window. This would result in the loss of 20% of the windows and about 5% of the wall surfaces. These activities would have a less-than-significant impact to historic resources under the CEQA definition of material impairment, and would generally meet the general recommendations provided in the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. No mitigation measures would be required.

After completion of the project, the Beach Chalet Athletic Fields would no longer be a contributor to the Golden Gate Park National Historic District, although the Restroom Building would continue to be a contributor as the proposed changes to it would be minimal. Considering there are 137 contributing resources to the District, the potential loss of one contributors or about 0.7% of the total would not constitute a significant impact to the District as a historic resource. In terms of size, the loss of the 6.8 acre Fields and Restroom in the context of the 1,000-acre Golden Gate Park Historic District would represent approximately less than 1% of the total acreage of the park. The loss of the Fields as a contributor to the District could not be perceived by the individual given the size of the District and the fact that the project site is relatively obscured from view along public roadways due to the intervening vegetation. As such, the District would remain eligible for listing in the National Register after completion of the project.

Cumulative Analysis

This analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, would result in cumulatively significant impacts on historical resources (based on the significance criteria and thresholds presented earlier). This analysis then considers whether the incremental contribution of the Beach Chalet Athletic Fields Renovation Project, in combination with other past, present, and reasonably foreseeable projects, would have a potential cumulatively considerable impact to the Golden Gate Park National Register Historic District.