Keep Crocker Real

Public Safety · Public Health · Urban Nature · Healthy Play

Project: Crocker Amazon Baseball and Softball Fields Renovation

Lead Agency: San Francisco Recreation and Park Department

Dear City Leaders:

Keep Crocker Real respectfully submits these formal public comments pursuant to the California Environmental Quality Act (CEQA), Public Resources Code §21000 et seq., and the CEQA Guidelines, 14 Cal. Code Regs. §15000 et seq. We urge the Planning Commission to recognize Crocker Amazon is eligible for protection under CEQA and requires the preparation of a full Environmental Impact Report (EIR). No categorical exemption or Negative Declaration should be issued until all significant environmental effects documented herein have been fully analyzed.

I. Project Description

The proposed project would demolish and renovate 20 acres of Crocker Amazon to include five new athletic fields surfaced with artificial turf and a sixth partially surfaced with artificial turf; an artificial turf dog park; an expanded outdoor plaza; a doubled parking lot footprint; 1.5 additional miles of paved paths; tournament-quality stadium lighting; a batting cage surfaced with artificial turf; a restroom facility; a new retaining wall; and extensive regrading. The project requires removal of 105 trees — including 42 Monterey Cypress and 6 Monterey Pine (California native species) — and replaces approximately 20 acres of natural grass with synthetic plastic turf containing per- and polyfluoroalkyl substances (PFAS) that will shed microplastic fibers for over a decade until the fields are sent to the landfill.

II. Historic and Cultural Resources

A. The Crocker Amazon Landscape Is a Significant Historic Resource

Crocker Amazon represents one of San Francisco's most significant New Deal-era public works landscapes. From 1934 to 1937, workers from the Works Progress Administration (WPA) and the State Emergency Relief Administration (SERA) developed the site from an agricultural reservoir into a public recreational facility — grading 11 baseball diamonds, installing 23,050 feet of water pipe, constructing 72 rock steps and copings, 15,455 lineal feet of rock gutters, 6,000 square feet of log retaining walls, 50 lineal feet of rubble wall, 1,500 lineal feet of paths, and surfacing 132,960 square feet of paths. The site was planted with Monterey Cypress trees expressly chosen by Superintendent John McLaren to serve as windbreaks enabling the recreational use he envisioned for the southern neighborhoods of San Francisco.

The site is significant under multiple criteria of the California Register of Historical Resources (CRHR) and the National Register of Historic Places (NRHP):

- **Criterion A / 1 (Events):** Crocker Amazon is directly associated with the Works Progress Administration and the New Deal era, representing the federal government's most significant peacetime investment in public infrastructure and social welfare. The WPA's construction of this site is documented in federal and city records and listed in the Living New Deal database.
- **Criterion A / 1 (Additional Association):** The site served as the location of the U.S. Naval Receiving Hospital during World War II, a distinct period of significance tied to the war effort and San Francisco's role as a Pacific embarkation point.
- **Criterion B / 2 (Person):** The landscape embodies the vision of John McLaren, Superintendent of Golden Gate Park and a person of unambiguous historical significance to San Francisco. McLaren specifically requested the development of a large park with windbreak trees in the southern part of the city. The Monterey Cypress grove proposed for removal is the direct physical expression of that vision.
- **Criterion C / 3 (Design/Master Architect):** The site represents the comprehensive recreational site planning work of William G. Merchant, a Master Architect of recognized significance in San Francisco's architectural history. Crocker Amazon is documented as Merchant's largest playground design and a rare surviving example of his comprehensive site planning work for New Deal-era recreation facilities. The bleacher buildings, stairways, stone gutters, paths, and field layouts constitute an integrated designed landscape of distinctive character.

The integrity question raised in prior correspondence — whether the site retains sufficient integrity to convey its significance — must be formally evaluated by the Historic Preservation Commission before any CEQA determination is issued. We note that integrity is assessed across seven aspects (location, design, setting, materials, workmanship, feeling, and association), and that a site may retain significance under Criterion C at the local level even where some aspects of integrity are compromised. The original WPA-constructed stairways, bleacher buildings, stone copings, and 90-year-old tree canopy planted to Merchant's design specifications are all at risk of demolition under the proposed project. Previous parts of the WPA-era design were demolished for a 12-acre artificial turf soccer field.

B. The Marino Pieretti Murals

The murals on the exterior of the bleacher building at Diamond #1 (known as "Pieretti Field") hold significant cultural and historical value as tributes to Marino "Chick" Pieretti (1920–1981), an Italian-born, North Beach–raised pitcher who became a beloved figure in San Francisco's baseball history. Pieretti overcame repeated rejections due to his small stature to achieve a distinguished professional career, winning a league-leading 26 games for the Portland Beavers in 1944 before pitching for the Washington Senators, Chicago White Sox, and Cleveland Indians over six major league seasons. The field and its murals commemorate not only Pieretti's personal perseverance but also the broader legacy of San Francisco's Italian-American community, which produced a remarkable constellation of major league players — including the DiMaggio brothers, Tony Lazzeri, and Frankie Crosetti — many of whom grew up in North Beach and settled in the Excelsior and Crocker Amazon neighborhoods. The murals serve as a tangible, community-rooted expression of this history and of Pieretti's post-playing devotion to youth baseball clinics and coaching, for which the field was named in his honor. Their demolition as part of the proposed renovation would constitute an irreversible loss of a cultural resource

that reflects the ethnic heritage, recreational traditions, and neighborhood identity of San Francisco's Outer Mission and Excelsior districts.

C. Article 10 Landmark Eligibility

The Crocker Amazon Park and its designed landscape appear to qualify for landmark designation under Article 10 of the San Francisco Planning Code on the basis of its association with the WPA, its design by William G. Merchant, and its embodiment of New Deal-era recreational planning values. The Planning Commission and Historic Preservation Commission should evaluate landmark eligibility before approving any project that would substantially alter the site's character-defining features.

D. Project Impacts on Historic Resources Are Significant Under CEQA

Under CEQA Guidelines §15064.5, a project that causes a substantial adverse change in the significance of a historical resource constitutes a significant effect on the environment. The proposed removal of 42 Monterey Cypress trees averaging 33 inches DBH — the trees planted to Merchant's and McLaren's design specifications as the site's primary windbreak — constitutes a substantial adverse change to the character-defining features of this WPA-era cultural landscape. The replacement of natural grass fields with synthetic turf, the doubling of the parking lot, the addition of 8,500 linear feet of viny-clad chain-link fencing and the addition of 1.5 miles of new paving further alter the pastoral, naturalistic character that defines the site's historic integrity.

III. Biological Resources

A. California Threatened Species: Tricolored Blackbird

The Tricolored Blackbird (Agelaius tricolor) is listed as a Threatened species under the California Endangered Species Act (CESA) since 2019. CDFW requires pre-construction surveys with a minimum 500-foot buffer around project areas, and prohibits work within 500 feet of an active nest without written CDFW approval. Any project that could result in take of this species requires a Section 2081 Incidental Take Authorization.

The Tricolored Blackbird is documented as using McLaren Park and the surrounding southern San Francisco corridor. The 105 trees proposed for removal include the precise type of habitat — mature conifer groves adjacent to open grassland foraging areas — that this species uses for colonial nesting.

The Monarch butterfly (Danaus plexippus), whose West Coast overwintering and migration route is critically imperiled, has been photographed at Crocker Amazon Park. Occurrence records are publicly visible on iNaturalist.org. The Monarch is a candidate for state and federal listing and its presence at this site must be considered in a full biological resources assessment. The loss of natural vegetation through replacement with artificial turf and removal of trees would eliminate foraging and resting habitat for this at-risk species along its migration corridor.

Crocker Amazon Park serves as a critical habitat linkage between San Bruno Mountain — one of the most biologically significant open spaces in the Bay Area and home to several federally

listed butterfly species — and McLaren Park. This green corridor function is not replaceable by plastic turf and must be analyzed as part of any CEQA review of this project's biological impacts.

B. Additional Bird Species of Local Concern

The San Francisco Urban Forestry Council and Cornell Lab of Ornithology's eBird database record 162 species of birds using McLaren Park. The Monterey Cypress trees proposed for removal provide documented nesting habitat for:

- Nuttall's Woodpecker — Species of Local Concern, dependent on mature tree cavities, confirmed nesting at Crocker Amazon
- Pygmy Nuthatch — Species of Local Concern, dependent on mature conifer canopy, confirmed nesting at Crocker Amazon
- Red-tailed Hawk — documented nesting in Monterey Cypress, McLaren Park
- Red-shouldered Hawk — Bird of Local Concern
- Great Blue Heron — documented nesting in Monterey Cypress, San Francisco, frequently photographed feeding in Crocker Amazon meadows
- American Kestrel — declining urban raptor
- Western Red Bat (Lasiurus blossevillii) — California Species of Special Concern; the Crocker Amazon Monterey Cypress grove is a documented bat migration and roosting site whose destruction would eliminate irreplaceable urban bat habitat

All of the above are protected under the federal Migratory Bird Treaty Act and California Fish and Wildlife Code §§3503–3513. The arborist report itself acknowledges compliance with these statutes is required, stating that breeding bird surveys must be conducted prior to tree removal. That acknowledgment, in the project's own technical documents, constitutes substantial evidence that nesting species are present and that take is possible — a mandatory trigger for CEQA biological review.

C. Adjacency to a Designated Natural Area

The Crocker Amazon site abuts a designated Natural Area within McLaren Park. The proposed project — including expanded parking, tournament lighting, and 1.5 miles of new paved paths — would generate edge effects, increased human activity, noise, light pollution, and invasive species pressure that extend well into the adjacent Natural Area. These impacts have not been analyzed.

D. Cumulative Loss of Urban Wildlife Corridor

The Keep Crocker Real letter documents that the Crocker Amazon tree canopy forms part of a green corridor for resident and migratory birds and mammals across southern San Francisco. Cumulative artificial turf installations (athletic fields, dog parks, playgrounds, driving range) across 48 acres of city parks — concentrated disproportionately in the southeastern

environmental justice communities — are eliminating foraging habitat, green corridors, and natural ground cover that urban wildlife depend upon. The cumulative biological impact of these successive projects must be analyzed in a program-level EIR.

IV. Hydrology, Water Quality, and Historic Waterways

A. Loss of 5.4-Million Gallons of Annual Stormwater Infiltration

The replacement of 20 acres of natural grass with nine acres of impermeable synthetic turf is projected to eliminate approximately 5.4 million gallons of annual rainfall infiltration. Natural grass absorbs and transpires stormwater; synthetic turf sheds it. This eliminated infiltration will be routed to the combined sewer system to avoid artificial turf chemical contamination of groundwater — increasing sewer treatment costs, contributing to combined sewer overflow events during heavy rains, and adding infrastructure burden to a district already experiencing flooding problems.

The calculation: Rec/Park has stated it will install 393,093 square feet of new artificial turf at Crocker Amazon Park. This plastic surface is impermeable, diverting rainfall that would otherwise percolate into the ground into the combined sewer system. Based on San Francisco's annual average rainfall of 22.28 inches, the computation below demonstrates that approximately 5.4 million gallons of water per year will be diverted to the sewer rather than recharging groundwater:

Step 1: Convert sq ft to sq inches: 393,093 × 144 = 56,605,392 sq in

Step 2: Cubic inches of rain: 56,605,392 × 22.28 = 1,261,128,173.76 cu in

Step 3: Convert to gallons: 1,261,128,173.76 × 0.004329 = 5,460,183 gallons/year

This 5.4-million-gallon annual diversion has not been analyzed for its impacts on the combined sewer system, on downstream receiving waters, or on the elimination of groundwater recharge that the existing natural grass currently provides. CEQA requires this analysis.

The addition of a doubled parking lot and 1.5 miles of new impermeable paving compounds this impact by creating substantial new impermeable surface area in a neighborhood with documented flooding concerns. The CEQA analysis must quantify the increase in impermeable surface area, model stormwater runoff volumes, and analyze impacts to the combined sewer system under both normal and storm conditions.

B. The Historic Crocker Amazon Creek and Hummingbird Farm Waterway

Historical creek mapping (Oakland Museum of California, Topographic Map of San Francisco, 1895; Joel Pomerantz, "The Clean Secret," joelpomerantz.com) documents that a natural creek originated at the Hummingbird Farm site in the eastern portion of McLaren Park, flowed down Geneva Avenue, and drained through the Visitacion Valley area. This waterway, now largely culverted, continues to flow through Hummingbird Farm — an active urban farm and ecological resource within the park.

The elimination of 5.4 million gallons of annual groundwater recharge will reduce the water available to feed this historic waterway and the ecological community of Hummingbird Farm that depends on it. The microplastic and PFAS contamination shed by the plastic turf fields will enter the watershed through stormwater runoff, potentially reaching the farm's soil and plantings. CEQA requires analysis of these impacts to a waterway of potential historic and ecological significance.

Note: The Cultural Landscape Report prepared by Architectural Resources Group includes a small section of the 1861 Wackenreuder Map of San Francisco that incorrectly depicts the location of the headwaters of the creek and also omits the creek that flowed from McLaren Park down Sunnydale Avenue. See the Pomerantz Seep City map available online at the David Rumsey Map Collection and the Flooding (Stormwater) map layer on the San Francisco Property Information Map - Map Viewer.

C. PFAS and Microplastic Contamination of Water and Soil

Artificial turf systems contain PFAS (per- and polyfluoroalkyl substances, so-called "forever chemicals") in the turf plastic grass blades and backing materials. PFAS chemicals have also been found in Brock shock pads, the material underlying artificial turf fields that softens falls. PFAS are persistent bioaccumulative toxins with no safe exposure threshold established by current science. Rainfall on artificial turf fields leaches PFAS chemicals into stormwater, which then enters the combined sewer system or groundwater depending on drainage design.

California's regulatory framework increasingly treats PFAS and microplastics from synthetic turf as priority pollutants requiring formal CEQA analysis. The California Department of Toxic Substances Control (DTSC) now regulates PFAS as a chemical class at the parts-per-quadrillion (PPQ) level. DTSC has added microplastics to its Priority Chemicals List (May 2023) and is actively bringing PFAS and other chemicals in artificial turf under regulation through its 2021–2023 Priority Product Work Plan. Senate Bill No. 1263 (Chapter 609, 2018) established California's Statewide Microplastics Strategy. In December 2023, the California Coastal Commission issued a conditioned permit for the UCSB Cesar Uyesaka Baseball facility requiring natural grass only — citing microplastic pollution concerns — and also conditioned no removal of trees. The Commission's conclusion that artificial turf is incompatible with environmental protection standards in a sensitive context applies with equal or greater force here. Artificial turf is not eligible for categorical exemptions under CEQA for various reasons, including multiple and cumulative effects and greenhouse gas emissions.

Additionally, artificial turf sheds microplastic particles continuously throughout its lifespan. Wind and fog transport of microplastics from the fields will deposit contamination in the adjacent La Grande Community Garden and Hummingbird Farm — active food-producing urban farms within or immediately adjacent to the project site — as well as in residential areas downwind such as Sunnydale and Visitacion Valley. The exposure pathway is particularly acute given that this site is in a designated Air Pollutant Exposure Zone with documented Sensitive Receptors.

V. Air Quality, Public Health, and Environmental Justice

A. Air Pollutant Exposure Zone with Sensitive Receptors

Crocker Amazon is located in a Bay Area Air Quality Management District (BAAQMD) Air Pollutant Exposure Zone, meaning it already experiences elevated concentrations of particulate matter and other pollutants from adjacent freeway emissions. The surrounding neighborhoods are low-canopy, underserved census tracts with documented health burdens including elevated asthma rates.

The 42 Monterey Cypress trees proposed for removal — evergreen conifers with dense year-round foliage — are among the most effective urban trees at intercepting and removing particulate matter from the air. The USDA Forest Service's i-Tree analysis of San Francisco's urban forest found the city's trees remove approximately 260 tons of air pollution annually, valued at $1.3 million per year. Removing 105 mature trees from a site already in an Air Pollutant Exposure Zone, serving children and elderly users who are Sensitive Receptors, constitutes a potentially significant adverse public health impact that requires full CEQA analysis. Planting dozens of saplings and shrubs around the artificial turf fields won't compensate for this loss. The maturity and circumference of the trees lost has a significant effect on the community and wildlife.

B. Crystalline Silica Sand Infill – Suberosis and Respiratory Disease

The project proposes to use sand from G3 Enterprises as infill material between the artificial turf blades. Natural sand infill contains respirable crystalline silica, listed under California Proposition 65 as a chemical known to the State of California to cause cancer via the inhalation route, and regulated by Cal/OSHA (8 CCR §5204) as a respiratory hazard requiring exposure monitoring and medical surveillance for workers. When athletes play on a synthetic turf field with sand infill, the sand is disturbed and becomes airborne. Groundskeepers who rake, groom, and maintain the infill face the highest sustained occupational exposure. Neighboring residents are also exposed via wind-borne dispersal of silica dust, and infill migrates off the field on shoes and clothing into homes and vehicles.

C. Cork Infill – A Prop 65 Carcinogen

If cork is used as infill — as is reportedly planned for this project — it introduces a distinct and documented respiratory hazard. According to the Massachusetts Toxics Use Reduction Institute (TURI) report Athletic Playing Fields: Choosing Safer Options for Health and the Environment (TURI Report #2018-002, December 2018, updated April 2019), respiratory disease has been documented in cork workers exposed to cork dust. TURI cites a 1973 peer-reviewed study (Pimentel JC and Avila R, "Respiratory disease in cork workers ('suberosis')," Thorax 28:4, 409–423) that concluded: "workers in factories where cork is processed and transformed into commercial products may acquire incapacitating disease of the respiratory tract." The respiratory disease associated with cork dust exposure is known as suberosis, and fungi that frequently colonize cork appear to play a role in the disease, although the mechanism is not fully understood.

Cork infill for synthetic turf fields is typically granulated from cork bark, generating fine particulate dust during installation, maintenance, grooming, and play. This dust is analogous in its inhalation hazard to the occupational exposures that cause suberosis in cork industry workers. The distinction between occupational and recreational exposure thresholds has not been analyzed for this project. Groundskeepers maintaining the fields, children playing on the surface, and neighbors downwind of the park face a potentially significant and wholly unanalyzed respiratory exposure pathway. Moreover, cork infill is typically harvested and processed overseas, raising lifecycle GHG concerns addressed in Section V below.

The CEQA record contains no analysis of either the crystalline silica or the cork dust inhalation pathways. Either one, in the context of this community's documented respiratory disease burden, would constitute a potentially significant environmental impact requiring full EIR analysis. Together, they compound an already serious public health concern.

D. Community Respiratory Health Baseline – Among the Highest Asthma Rates in the City

According to the San Francisco Health Improvement Partnership Community Health Needs Assessment (2016), published by the San Francisco Department of Public Health (available at https://www.sfgov.org/sfc/sites/default/files/Asthma/2016%20CHNA%20Asthma%20(1).pdf), the ZIP codes surrounding Crocker Amazon Park have among the highest asthma and COPD hospitalization rates in San Francisco:

- ZIP 94134 (Visitacion Valley / Sunnydale / Crocker Amazon): adult asthma hospitalization rate of 7.50 per 10,000 residents — the second highest in the city — and COPD hospitalization rate of 8.33 per 10,000.
- ZIP 94112 (Excelsior / Ocean View / Ingleside): adult asthma hospitalization rate of 4.48 per 10,000 residents.
- The CHNA report states that "COPD and asthma hospitalization rates are highest in the eastern and southeastern sections of the city coinciding with areas of lower socioeconomic status and higher proportion of minority populations."
- Black/African American adults in San Francisco have asthma hospitalization rates nearly nine times higher than white adults. Black/African American high school students have an asthma prevalence of 37.6% — the highest of any demographic group in the city.

The CEQA Guidelines require that a lead agency assess the vulnerability of sensitive receptors — defined to include children, the elderly, and persons with pre-existing respiratory conditions — when evaluating toxic air contaminant impacts. A community already bearing among the highest respiratory disease burdens in the city is a population of sensitive receptors whose existing health baseline renders additional toxic air contaminant exposure more significant, not less. The deliberate introduction of Proposition 65-listed crystalline silica and documented respiratory hazards from cork dust into a public park in this community, without any CEQA air quality or public health analysis, cannot be justified under any categorical exemption.

E. Microplastic, Nanoplastics and Volatile Organic Compound Inhalation

Artificial turf fields in active use — particularly during athletic events in warm weather — release microplastic particles and volatile organic compounds (VOCs) into the breathing zone of players

and spectators. Children engaged in strenuous exercise at Sensitive Receptor status inhale at elevated rates. If the project intends to concentrate tournament events at this location, it will substantially increase the number of child-hours of exposure per year. This hazardous materials and air quality pathway has not been analyzed in any CEQA document. SFRPD says they have a directive per the Park Code to double the hours of play, thus doubling exposure to artificial turf harms.

A peer-reviewed 2025 scientific review published in Environments (Harusato A. and Kato M., "Mechanisms of Generation and Ecological Impacts of Nano- and Microplastics from Artificial Turf Systems in Sports Facilities," *Environments* 2025, 12(4), 109; https://doi.org/10.3390/environments12040109) documents that artificial turf systems are a significant and quantifiable source of nano- and microplastics (NMPs) generated specifically from the breakdown of synthetic grass fibers and backing materials — not only from rubber infill.

The review documents the following findings that are directly applicable to the Crocker Amazon project:

- Scale of emission: A single full-size synthetic turf sports field can release several hundred kilograms of plastic particles annually from fiber and backing degradation alone, accounting for approximately 38% of total estimated microplastic release in European urban environments. The proposed five-field-plus installation at Crocker Amazon would multiply this emission rate substantially.
- Generation mechanism: Combined mechanical stress from foot traffic and play, UV radiation from sunlight, and weathering processes cause the breakdown of synthetic grass fibers and backing materials, generating particles ranging from nanometer to millimeter scales continuously throughout the life of the turf. This process is independent of infill type.
- Nanoplastics — a distinct and more severe hazard: The review specifically documents the generation of nanoplastic particles (below 1 micrometer) from turf fiber degradation. Nanoplastics are a qualitatively distinct hazard from microplastics: they are small enough to cross biological membranes, penetrate lung tissue, and translocate to other organs. Chronic inhalation of airborne NMPs has been associated in recent studies with respiratory inflammation, pulmonary stress, and systemic toxicity. The prior CEQA comment letter addressed microplastics primarily through the regulatory framework. This study adds the specific mechanistic and health evidence that nanoplastics from turf fibers represent a distinct and unanalyzed inhalation exposure pathway for athletes, groundskeepers, and neighboring residents.
- Direct human exposure documented: Higher concentrations of NMPs have been detected in the saliva of athletes competing on synthetic turf surfaces, providing direct evidence of human exposure during ordinary play.
- Atmospheric transport beyond field boundaries: Polyethylene particles — the primary material used in synthetic turf fibers — are transported atmospherically beyond the field boundary, meaning neighboring residents, not only athletes, are exposed to NMPs generated by the turf.
- NMPs as chemical vectors: NMPs from turf fibers adsorb heavy metals, polycyclic aromatic hydrocarbons (PAHs), and persistent organic pollutants (POPs) from the environment, concentrating and transporting these co-contaminants into the bodies of those who inhale or ingest them. This compounds the PFAS and phthalate exposure pathways documented in the original comment letter.

- EU regulatory response: The European Union has banned crumb rubber infill as a microplastic source and the scientific community has called on other nations to follow. The scientific basis for that action — plastic particle generation from turf systems — applies equally to plastic grass blade fiber and backing degradation, which is the source of NMPs in the absence of rubber infill.

The combination of crystalline silica dust from sand infill, fine cork dust from cork infill, and nano- and microplastic particles continuously generated from turf fiber and backing degradation creates overlapping, compounding, and wholly uncharacterized inhalation exposure pathways for children, athletes, groundskeepers, and neighboring residents in a community with among the highest respiratory disease rates in San Francisco. This cumulative inhalation hazard has received zero analysis in the CEQA record and cannot be dismissed through a categorical exemption.

F. Chemical Hazards

The CEQA hazardous materials analysis must address the full suite of chemical additives present in the artificial turf blades themselves. Synthetic turf blades manufactured from polyethylene or nylon contain the following classes of chemical additives with documented hazard traits, none of which have been analyzed in the CEQA record:

- Ortho-phthalates: Phthalate plasticizers, including DEHP, DBP, and BBP, are added to turf components to maintain flexibility. These compounds are regulated under California's Proposition 65 as reproductive toxicants and are on DTSC's Priority Chemicals List. They leach from turf materials into soil and stormwater and are absorbed dermally by children playing on the surface.
- Colorants and pigments: Artificial turf blades are colored with pigments that may contain heavy metals including lead, cadmium, and chromium — Proposition 65-listed toxicants. UV degradation of pigments releases these compounds into the environment.
- Antioxidants: Chemical antioxidants are added during manufacturing to prevent turf polymer degradation. These compounds, including hindered phenols and phosphite antioxidants, leach from turf materials over time and have not been assessed for ecological or human health impacts at this site.
- UV light stabilizers (HALS — Hindered Amine Light Stabilizers): UV stabilizers are added to extend turf blade life under sun exposure. These compounds are persistent in the environment, have been detected in stormwater runoff from synthetic turf fields, and have not been assessed for toxicological impacts at this site.

Taken together with PFAS, crystalline silica, and nano- and microplastics, these chemical hazards represent multiple, overlapping, and largely uncharacterized exposure pathways for children, athletes, groundskeepers, and neighboring residents in a community with documented high rates of respiratory and chronic disease. A full EIR must characterize all relevant exposure pathways and assess their significance against the baseline health conditions of this community.

G. Stadium Lighting into the Neighborhood

The proposed project includes tournament-quality stadium lighting. Community members report that existing field lighting already spills into the surrounding neighborhood until approximately 10:00 PM. Tournament use would extend and intensify this light pollution, affecting the sleep and health of residents in adjacent homes, degrading the dark sky environment for wildlife, and altering the character of a residential neighborhood whose homes directly abut the park. Light intrusion impacts on neighbors and on nesting birds have not been analyzed.

The Musco Lighting engineering plan (Design No. 192347D, January 30, 2026) for Crocker Amazon — a plan obtained by community members — confirms that the proposed lighting system includes 156 fixtures on poles up to 80 feet tall, with a total connected load of 158.89 kW across two baseball fields and three softball fields. The Musco photometric maps show light values at the property line and at the 150-foot spill boundary, and candela values reaching as high as 6,977 per lightbank along the property line perimeter. These figures confirm that stadium-level illumination will spill significantly into the surrounding residential neighborhood. The full lighting impact analysis required by CEQA — including effects on neighboring residents, nesting birds, Monarch butterfly migration behavior, and the park's existing nocturnal character — has not been prepared.

H. Environmental Justice and Cumulative Artificial Turf Impacts

The CEQA Guidelines require analysis of environmental justice impacts and disproportionate effects on low-income and minority communities. The concentration of 48 acres of artificial turf installations in city parks — spanning athletic fields, the driving range, playgrounds, and dog parks, with a documented disproportionate share in the southeastern environmental justice communities of San Francisco — represents a cumulative pattern of replacing natural green infrastructure with fossil fuel-derived plastic surfaces in communities that already bear disproportionate pollution burdens. A program-level EIR is warranted to analyze these cumulative environmental justice impacts.

I. Toxic Vinyl-Clad Chain-link Fencing

The project proposes approximately 8,500 linear feet of vinyl-clad chainlink fencing surrounding the athletic fields. Vinyl (polyvinyl chloride, or PVC) fencing contains and releases phthalate plasticizers — endocrine-disrupting chemicals regulated under California’s Proposition 65 as reproductive toxicants and on DTSC’s Priority Chemicals List. PVC manufacturing and degradation also releases dioxins and lead stabilizers that accumulate in soils and stormwater. UV-exposed vinyl fencing degrades over time, releasing microplastic particles and chemical leachate into surrounding soil and stormwater.

The California Department of Toxic Substances Control (DTSC) is actively regulating phthalates and related plasticizers under its Safer Consumer Products program. No CEQA analysis of these chemical exposure pathways has been provided. A full chemical hazard assessment of the proposed PVC fencing, including exposure pathways for park users and neighboring residents, and an evaluation of non-toxic alternatives such as galvanized or powder-coated steel fencing, is required.

The project is partially funded by a voter-approved San Francisco City bond measure. The installation of 8,500 linear feet of toxic vinyl-clad PVC chainlink fencing — a material associated with chemical hazards, microplastic generation, and a degraded park environment — is difficult

to reconcile with the purposes for which voters approved park bond funding. CEQA's alternatives analysis requirement compels evaluation of non-toxic fencing alternatives that would achieve the project's security objectives without these chemical risks.

VI. Climate Change, Greenhouse Gas Emissions, and Urban Heat

A. Carbon Storage and Sequestration Loss

The 90-year-old Monterey Cypress trees at Crocker Amazon represent irreplaceable stored carbon. USGS research demonstrates that large mature trees store the most total carbon and remove the most carbon per year on an exponential curve — trees that have grown for nearly a century cannot be replaced by saplings within any relevant planning horizon. Removal delivers a double climate negative: carbon emissions from felling, plus permanent loss of future sequestration capacity. This is in direct conflict with San Francisco's Climate Action Plan and California's Nature-Based Solutions Climate Targets under Assembly Bill 1757, which require conservation of existing urban tree cover.

B. Urban Heat Island Effect

Plastic turf surfaces can reach surface temperatures of 160-200°F on warm sunny days — significantly hotter than natural grass or bare soil. The replacement of 20 acres of natural grass and a mature tree canopy with artificial turf will intensify the urban heat island effect in a neighborhood that already experiences elevated temperatures relative to San Francisco's fog-cooled northern neighborhoods. The Keep Crocker Real letter documents that during the March 2026 heat dome event, the park's southern location and low tree canopy already created dangerous heat conditions on the artificial turf soccer fields. Removing the Monterey Cypress canopy and replacing natural grass with heat-amplifying artificial turf will worsen these conditions for a community that has the fewest resources to adapt. Using cork infill has a negligible impact on reducing the heat island effect.

C. Plastic Turf Off-Gassing — Methane and Ethylene, Greenhouse Gas Emissions

Artificial turf off-gases both methane and ethylene continuously — day and night, and in ever-increasing amounts throughout the approximately 1,000 years it takes for the plastic to fully decompose. Methane traps 90% more heat than carbon dioxide and is 21 times more potent as a greenhouse gas. Research demonstrates that land-based plastics produce 2 times more methane and 76 times more ethylene than equivalent plastics found in waterways and oceans. These off-gassing impacts are not trivial and must be quantified in any greenhouse gas emissions analysis as required by Cal. Code Regs. tit. 14 § 15064.4 (effective December 28, 2018), which mandates a good-faith effort, based to the extent possible on scientific and factual data, to quantify greenhouse gas emissions resulting from a project. The analysis must also consider a timeframe appropriate to the project and must reasonably reflect evolving scientific knowledge and state regulatory schemes. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide or global emissions. San Francisco has adopted a Climate Action Plan aimed at reducing greenhouse

gas emissions, with targets to cut emissions significantly below 1990 levels. The city is committed to achieving net zero emissions by 2050.

The lifecycle GHG footprint of the proposed 9 acres of artificial turf is substantial and encompasses every phase of the supply chain:

- Petroleum extraction and refining to produce the petrochemical feedstocks (polyethylene, polypropylene, nylon) from which turf fibers and backing are manufactured;
- Energy-intensive manufacturing of turf components overseas, involving significant industrial energy consumption and associated GHG emissions;
- Processing of cork infill, which is typically harvested and processed overseas, generating transportation and processing emissions;
- International and cross-country shipping of finished turf products and infill materials to San Francisco, generating substantial freight GHG emissions;
- Installation operations including site preparation, removal of 20 acres of natural grass and trees — eliminating their carbon sequestration function — and excavation and paving for new concrete paths and a doubled parking lot; and
- End-of-life disposal, including transportation of spent turf to landfill every 8–10 years, where the plastic continues to off-gas methane and ethylene for approximately 1,000 years.

D. CEQA Legal Requirements — Feasible Alternatives and Mitigation

Section 21080.5(d)(2)(A) of CEQA prohibits approval of a proposed development if there are feasible alternatives or feasible mitigation measures available that would substantially lessen any significant adverse effect which the activity may have on the environment. Natural grass renovation is a feasible alternative that has not been analyzed. Cal. Pub. Res. Code § 21000(g) further requires that all state agencies regulating activities that affect the quality of the environment give major consideration to preventing environmental damage. An awareness of legislative and regulatory schemes is a requirement under Title 14, Natural Resources, Division 6, California Natural Resources Agency, Chapter 3 (Guidelines for the Implementation of CEQA), Article 1, General § 15004 (Time of Preparation): public agencies shall not undertake actions concerning a proposed project that would limit the choice of alternatives or mitigation measures before completion of CEQA compliance.

The fact that three existing youth athletic fields sit within half a mile of Crocker Amazon Park that could absorb the increased baseball and softball demand the project cites as its primary justification is another feasible alternative that wasn’t considered:

- Herz Playground — an existing youth athletic facility within the project’s immediate service area;
- Alice Chalmers Playground — an existing field within half a mile of Crocker Amazon Park; and
- Excelsior Playground — an existing field within half a mile of Crocker Amazon Park.

Each of these facilities could potentially be upgraded or scheduled more intensively to meet additional baseball and softball demand without installing 9 acres of artificial turf, removing 20 acres of trees and natural grass, adding new concrete paths, or doubling the parking lot at Crocker Amazon Park. The failure to analyze these nearby alternatives — or any alternatives — is an independent and sufficient basis for requiring a full EIR. A categorical exemption cannot be justified when obvious, nearby, feasible alternatives capable of meeting the project's stated objectives without significant environmental impacts have not been considered.

E. Artificial Turf Waste — Nearly 200,000 Pounds Every 10 Years

Plastic turf has a functional lifespan of approximately 8-10 years, after which it must be replaced. The turf cannot be recycled and must be landfilled. Notably, Verde Design — SFRPD's own design contractor for this project — has publicly admitted that artificial turf cannot be recycled. Each replacement cycle for 393,000 square feet of plastic turf at Crocker Amazon will generate approximately 200,000 pounds of unrecyclable plastic waste. CEQA requires analysis of solid waste generation, greenhouse gas emissions from turf manufacturing and disposal, and the absence of any viable end-of-life recycling pathway. This ongoing waste generation cycle — repeating indefinitely — constitutes a significant environmental impact. SFRPD considers future replacements to be "routine maintenance" and doesn't invite public scrutiny of additional replacement plastic once the first installation is complete.

Here's the math:

- Rate: 40,000 lbs ÷ 80,000 sq ft = 0.5 lbs per square foot
- Scaled up: 393,000 sq ft × 0.5 lbs/sq ft = **196,500 lbs** of mixed plastic turf

Under California Public Resources Code § 40191 (PRC § 40191), material constitutes "solid waste" the moment a public agency such as the San Francisco Recreation and Parks Department discards it because it is no longer fit for its intended use at the project site. Crucially, the intent to recycle, repurpose, or transform the material does not negate the act of discarding. Recycling and other diversion strategies are merely methods of managing waste — and under California's mandatory waste management hierarchy, they occupy a lower tier than Source Reduction.

California's Integrated Waste Management Act (Public Resources Code §40000 et seq.) establishes a mandatory waste management hierarchy that prioritizes, in descending order: (1) Source Reduction; (2) Reuse; (3) Recycling; (4) Composting; and (5) Transformation and Disposal. Source reduction — meaning not generating the waste in the first place — is the highest-priority obligation under California law. The installation of 9 acres of artificial turf that will become hundreds of thousands of pounds of solid waste every 8–10 years, indefinitely, bypasses Source Reduction entirely in favor of a waste stream that the project's own contractor (Verde Design) has admitted cannot be recycled. The failure to consider Source Reduction — i.e., retaining and improving the existing natural grass fields — as the legally preferred alternative violates both CEQA and the Public Resources Code.

VII. Tribal Cultural Resources and Ohlone Heritage

The Crocker Amazon site, as a former proposed reservoir and agricultural land developed in the 1930s, includes subsurface soils that have not been systematically evaluated for the presence of Ohlone Native American cultural resources. Extensive trenching for utilities, irrigation, drainage, and the new retaining wall proposed by the project carries a risk of encountering archaeological deposits, shell midden material, or burial sites associated with the Ohlone peoples whose territory encompassed the San Francisco Peninsula.

The San Francisco Estuary Institute places Tubsinte village on the southern side of McLaren Park in the vicinity of Crocker Amazon Park.

CEQA requires consultation with the appropriate Tribal Historic Preservation Officers and a Phase I archaeological survey before ground-disturbing activities commence. No such consultation or survey is reflected in the current CEQA record. Under AB 52, the lead agency is required to engage in formal government-to-government consultation with California Native American tribes that have requested consultation regarding projects that may affect tribal cultural resources.

VIII. Neighborhood Character, Access, and Recreation Conversion

A. Conversion from Pastoral Park to Regional Tournament Venue

The proposed project would fundamentally transform the character of Crocker Amazon from a neighborhood recreational facility serving local residents — walkers, dog owners, informal ball players, seniors, families — to a regional tournament venue attracting large numbers of non-resident visitors for competitive events. This transformation implicates traffic, parking, noise, lighting, and access in ways that constitute a significant change in the park's use and its relationship to the surrounding residential neighborhood that have not been analyzed.

B. Loss of Meadow, Windbreak, and Sound Barrier

The Monterey Cypress grove serves as both a windbreak — critical in a park where winds regularly reach 15-20+ mph — and a sound barrier between the athletic fields and adjacent residential properties. Neighbors currently enjoy views of a pastoral, naturalistic landscape. The proposed project would replace this with tournament lighting towers, artificial turf, fencing, and an expanded parking lot. These changes to views, sound environment, and wind exposure for adjacent residents constitute aesthetic and quality-of-life impacts that must be analyzed under CEQA.

C. Loss of Public Access Through Fencing and Privatization

Tournament use and private club use of athletic fields typically requires closure of the fields to the general public during events. The proposed conversion to tournament-quality facilities raises concerns about public access to parkland that is held in the public trust. The project's CEQA analysis must address how public access will be maintained, how frequently the fields will be closed for private or semi-private tournament use, and whether the project constitutes a

conversion of public parkland to a use that primarily serves non-resident organized sports interests rather than the surrounding community.

D. Increased Traffic from Tournament Events

Tournament athletic events generate substantially more vehicle trips than neighborhood recreational use. The doubling of the parking lot reflects an expectation of significantly increased vehicle traffic. Traffic analysis, air quality modeling for vehicle emissions, and noise analysis for this increased traffic load have not been provided as part of the CEQA record.

E. Noise Impacts from Public Address Systems to Aluminum Bleachers in a Neighborhood Setting

The CEQA Guidelines identify noise as a category of environmental impact requiring analysis when a project would expose persons to substantial increases in ambient noise levels or generate noise in excess of applicable local standards. No noise analysis has been provided for this project.

The project proposes tournament-level athletic facilities, including public address systems for competition use and new aluminum bleacher seating. Both will generate significant noise impacts on the immediately adjacent residential neighborhood:

- Public address systems: Tournament-level PA systems at baseball and softball facilities project announcer commentary, music, and crowd management instructions at volumes audible above ambient crowd noise. In a residential neighborhood where homes directly abut the park boundary, PA system noise during evening and weekend tournament events will constitute a significant and recurring disturbance that has not been analyzed.
- Aluminum bleachers: New aluminum bleacher installations generate characteristic impact noise from spectator movement, stomping, and percussion that carries significant distances in outdoor settings. Aluminum bleachers are substantially noisier than comparable wood or plastic seating. The cumulative noise impact of PA systems, aluminum bleacher noise, crowd noise, and extended evening use under stadium lighting has not been assessed.

San Francisco's General Plan Noise Element establishes standards for protecting residential neighborhoods from excessive noise. The project's failure to assess whether tournament-level operations — including PA systems and aluminum bleacher noise in the evening hours enabled by the proposed stadium lighting — will exceed these standards is a significant omission from the CEQA record.

F. Fire Hazard – Combustible Artificial Turf in a Residential Area

The project proposes to install 9 acres of synthetic turf in a park that directly abuts residential neighborhoods. Synthetic turf is a petroleum-based plastic product that is combustible and, once ignited, does not self-extinguish. When synthetic turf burns, it releases toxic combustion

products including hydrogen cyanide, dioxins, furans, and particulate matter — the same classes of compounds associated with structure fires involving plastic materials.

The proximity of 9 acres of combustible synthetic turf to residential structures is a land use compatibility issue that CEQA requires the lead agency to analyze under its hazards and hazardous materials impact category. Additionally, the replacement of 20 acres of natural grass and trees — which function as a firebreak and maintain soil moisture — with combustible synthetic turf, new concrete paths, and a doubled parking lot fundamentally alters the fire behavior environment in the vicinity of the park in ways that have not been assessed.

IX. The Project Is Ineligible for Categorical Exemption

A. No Exemption Class Applies

The project does not qualify as a minor alteration under Class 1, replacement of existing structures under Class 2, or minor alteration to land under Class 4 of the CEQA Guidelines. The removal of 105 mature trees averaging 35 inches DBH, replacement of 20 acres of natural grass with plastic turf containing forever chemicals, doubling of a parking lot, addition of 1.5 miles of impermeable paving, installation of tournament lighting, and transformation of a neighborhood recreational facility into a regional tournament venue are not "minor" alterations. They are fundamental changes to the physical and functional character of a historically and ecologically significant site.

B. The Unusual Circumstances Exception Applies (§15300.2(c))

Even if a class facially applied, at least six separate unusual circumstances independently trigger the exception to any categorical exemption:

- The site is in a designated Air Pollutant Exposure Zone with Sensitive Receptors including children in an already high-asthma neighborhood.
- The Tricolored Blackbird — a California Threatened Species under CESA — potentially nests in the trees proposed for removal, requiring Section 2081 Incidental Take Authorization.
- The site is a significant WPA-era cultural landscape designed by Master Architect William G. Merchant, potentially eligible for San Francisco Article 10 landmark status.
- Zero of the 309 trees assessed received a risk rating of 9 or above (the city's own abatement threshold), yet 82 are proposed for removal solely due to construction conflicts — not safety.
- The project replaces natural grass with PFAS-containing synthetic turf, generating nearly 200,000 pounds of unrecyclable plastic waste every 10 years and creating inhalation and water contamination pathways for Sensitive Receptors.
- The project abuts a designated Natural Area and destroys documented habitat for multiple Bird Species of Local Concern and a California Species of Special Concern (Tricolored Blackbird) and a Species of Special Concern (Western Red Bat).

C. The Cumulative Impact Exception Applies (§15300.2(b))

Successive artificial turf installations across 48 acres of city parks — concentrated in southeastern environmental justice communities — constitute a pattern of incremental but cumulatively significant impacts to air quality, biological resources, stormwater, and urban heat that require program-level analysis. Additionally, an estimated 28 trees documented in the 2021 HortScience arborist report are absent from the 2026 report without explanation, suggesting prior removals at this site that were not subjected to CEQA review.

D. The Sensitive Environment Exception Applies (§15300.2(a))

The site is environmentally sensitive in multiple, overlapping respects: Air Pollutant Exposure Zone designation; adjacency to a designated Natural Area; presence of California Threatened Species; active food-producing farms (La Grande Community Garden and Hummingbird Farm) that will receive microplastic and PFAS deposition; and a historic waterway (Crocker Amazon Creek) feeding Hummingbird Farm that will be deprived of groundwater recharge.

E. The Mandatory EIR Standard

CEQA Guidelines §15065 requires a lead agency to prepare an EIR whenever substantial evidence in the record supports a fair argument that the project may have a significant effect on the environment. The evidentiary record here — including the technical arborist report, the Keep Crocker Real scientific letter, species databases, historical records, BAAQMD Air Pollutant Exposure Zone designation, peer-reviewed research on synthetic turf chemicals, and resident testimony — constitutes substantial evidence supporting fair arguments for significant impacts across at minimum: historic resources, biological resources, air quality, hydrology, hazardous materials, noise, aesthetics, greenhouse gas emissions, tribal cultural resources, and environmental justice.

X. The Project Fails to Consider a Harm-Reduction Alternative

CEQA requires analysis of a reasonable range of alternatives that would achieve the project's objectives while reducing environmental impacts. No harm-reduction alternative has been analyzed or presented to the public. A harm-reduction alternative could include:

- Renovation of baseball and softball fields using modern natural grass infrastructure, leveraging the SF Giants' documented expertise in natural grass field maintenance at Oracle Park.
- The redistribution of play to nearby underutilized fields at Herz Playground, Alice Chalmers Playground and Excelsior Playground.
- Preservation of all Monterey Cypress, Coast Redwood, Torrey Pine, and Coast Live Oak trees rated Moderate to Excellent condition by the 2026 arborist report, through field re-orientation and adjusted grading plans.
- Elimination of the artificial turf component and retention of natural grass surfaces.
- A reduced parking footprint that does not double existing impermeable surface area.

- Lighting design that prevents spillover into the residential neighborhood.
- Field layouts that preserve the WPA-designed stairways, bleacher buildings, and historic landscape features.

The failure to analyze any alternative to the proposed design is itself a basis for requiring an EIR, which must include a meaningful analysis of alternatives under Public Resources Code §21002.

XI. Quantified Value of Trees Proposed for Removal

Using the CTLA Trunk Formula Method (ISA Guide for Plant Appraisal, 10th ed.) applied to the actual DBH measurements in the April 2026 HortScience arborist report, the replacement value of the 105 trees proposed for removal is estimated at $2,336,104 at a base rate of $45 per square inch of trunk cross-sectional area. This figure represents the cost to replace these trees with equivalent nursery stock — a cost that is functionally impossible to realize given that 100-year-old specimens cannot be replicated.

Removal Category	Trees	Native CA Species	CTLA Value
Within / adjacent to grading	76	36	$1,757,215
Poor condition / low suitability	22	9	$245,660
Other (plaza, retaining wall, etc.)	7	3	$333,229
TOTAL	105	48 (46%)	$2,336,104

Five of the highest-value trees proposed for removal were individually rated Good to Excellent condition by the same arborist recommending their removal, and received High suitability-for-preservation scores — they are being removed not because of arboricultural concern but because they fall within the construction footprint. This is a planning choice, not a safety necessity, and it is directly reversible through alternative design.

XII. Formal Requests

Keep Crocker Real respectfully requests that the SF Planning Department:

- Evaluate the Crocker Amazon Park and designed landscape for landmark designation eligibility under Article 10 of the San Francisco Planning Code.
- Direct staff to assess the Marino Pieretti murals for individual landmark eligibility and require analysis of construction impacts on those murals.
- Demand the preparation of a full Environmental Impact Report under CEQA, citing the extensive evidence of significant impacts to historic resources, biological resources (including CESA-listed Tricolored Blackbird), air quality, hydrology, PFAS/microplastic

hazardous materials, hydrology, Ohlone tribal cultural resources, greenhouse gas emissions, urban heat, and environmental justice.

- Request that the EIR include: (a) a cultural landscape assessment and integrity analysis; (b) a biological resources assessment with pre-construction breeding bird surveys including a 500-foot buffer for Tricolored Blackbird per CDFW protocols; (c) a PFAS and microplastic health risk assessment for Sensitive Receptors; (d) a stormwater analysis quantifying impermeable surface addition and sewer system impacts; (e) a tribal cultural resources assessment and AB 52 consultation record; (f) a cumulative impacts analysis for the citywide artificial turf program; and (g) a meaningful alternatives analysis including a natural-grass renovation alternative.
- Confirm the disposition of the approximately 28 trees documented in the 2021 HortScience report that are absent from the 2026 report, and whether any prior removals at Crocker Amazon were subjected to CEQA review.
- Recommend that no permits for tree removal, grading, or construction be issued until CEQA review is complete and all potentially significant impacts have been mitigated to less-than-significant levels.

Respectfully submitted,

Keep Crocker Real

Public Safety · Public Health · Urban Nature · Healthy Play

Appendix A: Tree Removal Data — HortScience April 2026 Arborist Report

All 105 trees marked "Remove" in the Tree Disposition attachment. CTLA values at $45/sq in, location class 0.90, species class and condition class per standard CTLA/ISA methodology.

Species	Count Removed	Avg DBH	CTLA Value	Key Facts
Monterey Cypress	42	34.8"	$1,021,086	Critically imperiled CA native; WPA-era planting; 0 trees at risk threshold 9+
Blue Gum Eucalyptus	43	41.2"	$1,072,169	Non-native; majority removed due to grading conflicts
Monterey Pine	6	47.3"	$192,075	Rare CA native; 100–150 yr lifespan
Blackwood Acacia	11	19.4"	$42,270	Non-native; all within grading footprint
Other	3	varies	$8,504	Lemon-scented gum, river red gum, turpentine tree
TOTAL	105	35.3"	$2,336,104	48 trees (46%) are California native species

Five highest-value trees rated Good–Excellent by HortScience yet proposed for removal:

Tree #	Species	DBH	Condition Rating	Suitability	Removal Reason	CTLA Value
#433	Monterey Cypress	54"	Good (4)	HIGH	Within grading	$68,452
#430	Monterey Cypress	65"	Fair (3)	Low	Within grading	$84,667
#485	Monterey Cypress	52"	Good (4)	Moderate	Adj. parking grading	$63,476
#488	Monterey Cypress	52"	Good (4)	Moderate	Within outdoor plaza	$63,476
#476	Monterey Cypress	58"	Fair (3)	Moderate	Adj. parking grading	$67,413

Appendix B: Risk Rating Distribution — No Trees Meet Abatement Threshold

Source: HortScience | Bartlett Consulting, April 2026. SF RPD may abate risk for trees rated 9 or greater. Zero trees reached this threshold.

Risk Rating	Category	Trees	Percent	Meaning
3–5	Low 1–3	207	67%	Insignificant — no concern for many years
6	Moderate 1	86	28%	Retain and monitor — not a problem for 10+ years
7	Moderate 2	13	4%	Retain and monitor — not a problem for 5–10 years
8	Moderate 3	3	1%	Retain and monitor — not a problem for 1–5 years
9–12	HIGH/EXTREME	0	0%	Abatement threshold — NOT REACHED by any tree

Appendix C: California and Federal Regulatory Hooks

Statute / Regulation	Applicability to This Project
CEQA §21084.1; Guidelines §15064.5	Substantial adverse change to historical resource (WPA landscape, Merchant design) = significant effect; EIR required
CEQA Guidelines §15300.2(c)	Unusual circumstances exception: Air Pollutant Exposure Zone, CESA-listed species, WPA historic site, Sensitive Receptors
CEQA Guidelines §15300.2(b)	Cumulative exemption exception: 48 acres citywide artificial turf + prior unexplained removals at this site
CEQA Guidelines §15065	Mandatory finding of significance: substantial evidence supports fair argument of significant impacts across 10+ categories
California Endangered Species Act §2081	Tricolored Blackbird (Threatened): Incidental Take Authorization required; no surveys conducted
CA Fish & Wildlife Code §§3503–3513	Migratory bird nesting protection: breeding bird surveys required before tree removal (acknowledged in arborist report)
AB 52 (Tribal Consultation)	Government-to-government consultation with Ohlone tribes required before ground disturbance
SF Planning Code Article 10	Landmark eligibility: Crocker Amazon Park and designed landscape (Merchant; WPA); Pieretti murals
AB 1757 (Nature-Based Solutions)	Conflict with state climate targets: Conservation of existing urban tree cover; prioritize low-canopy EJ communities
Migratory Bird Treaty Act	Federal protection for all migratory nesting birds; no take without federal permit

For further information, please contact Keep Crocker Real.