



## Candlestick Windsurfing



# 1 Introduction

Shifting now to the primary focus of these Comments, this part will examine the potential impacts of the proposed Project on the recreational windsurfing Resource at CPSRA.

The Waterfront Preservation District development pattern would strongly encourage and cultivate a truly remarkable and unique activity that currently coexists with the Baylands. Presently no consideration whatsoever is included for preserving the windsurfing Resource at CPSRA that has existed for 30 years.

The current DEIR claims “no significant impact” would take place on the Resource despite a wall of buildings some 200’ above sea level possibly being constructed just 500’ immediately upwind along the extent of the shore where windsurfing takes place.

## 1.1 Embrace Natural Resources

At the very outset and without first discussing technical errors and omissions in the Analysis, we believe the Project should strive to go above and beyond the very minimum of what is required by law in terms of natural resource preservation. The Project should embrace the adjacent recreational activities including the windsurfing Resource.

This Project is not located hundreds of miles inland amidst a sprawling uniform desert landscape. The Baylands is an incredible dynamic and sensitive area full of natural transition at the intersection of mountain, ocean, valley, and bay. It is a rare location with valuable recreational opportunities that exist no where else.

Presently, no consideration and mitigation whatsoever is included for windsurfing. The Project should go out of its way to avoid unforeseen or underestimated impacts to this and other resources and activities. It should voluntarily adopt a margin-of-error to avoid underestimating the risks to present natural and recreational resources. There is no reason why development cannot coexist with these activities and why both users of the natural resources and private project sponsors cannot benefit and prosper together.

The City of Brisbane should not accept highly questionable justification for “no significant impact” while completely ignoring the potential errors or understatements in the Analysis that may very well render the windsurfing Resource at CPSRA unusable or usable merely at a substantially reduced fraction of the present condition.

<b>Once development is in place, whatever damage may occur to natural resources either through known or unforeseen consequences will be practically irreversible.</b>
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## 1.2 Unique, Valuable, and Scarce Resource

These Comments were prepared by many for whom a very important part of their most passionate lifelong interest is in danger. Over 30 years of continual use and history at CPSRA has marked it as one of the premier windsurfing resources in the San Francisco Bay, if not the entire continental United States.

It is one of only three suitable windsurfing locations in San Francisco County, one of four locations regularly used on the Western side of the Bay north of CA-92, and one of the only locations in the entire Bay Area that is not subject to tidal restrictions, boat traffic hazard, or danger of stranding.

It is ideally suited to all skill levels and is routinely used by beginners as well as top-ranked world competitors. The unique topography and siting creates wind flow that is much more regular than anywhere else in the Bay Area. Finally, it is one of the only off-shore wind locations in the Bay making the water condition substantially devoid of wind swell even during periods of high wind.

An Internet forum at iWindsurf.com provides a community where people may post about windsurfing experiences. From 5/22/2008 to 6/19/2013, 4,372 such posts were recorded and analyzed for these Comments. Based on a keyword search over all of the Bay Area windsurfing sites, Candlestick was the second most frequently discussed site, trailing only Berkeley.

### 1.3 Unrealistic and Incomplete Thresholds, Assumptions, and Methods

Given their dedication to this unique and valuable Resource, the frustration and disappointment among those of the interested public who reviewed the proposed Project and Analysis was staggering. It is unfathomable to imagine that a possible virtual wall of 4,200' of construction up to 200' above sea-level in some areas along the Western edge of the Practical Sailing Area would have "no significant impact" on wind-flow on a site that begins just 500' downwind.



Figure 4: Existing Dirt Walls from Soil Processing on Baylands

Dirt mounds that rise some 50' to 70' above surrounding grades already border portions of the Western area of CPSRA [11]. The proposed Project could expand intense development North and South for a total length of perhaps 4,200' and increase the effective height of obstructions along this Western shore up to 200' above sea level in some portions. This figure is provided for scaling reference.

Only a handful of newly measured impact points specifically tied to the Project were even made in the Practical Sailing Area in the Analysis. The Practical Sailing Area is a fraction of the overall CPSRA, the

area most critical and regularly used, and the area closest to the Project and most susceptible to impact.

No measurement points were made in this Practical Sailing Area closer than at least 1,500' from the Project itself. Nonetheless, 58% of the sparse few newly measured Analysis points in this area were projected to be at levels that would contribute to a substantial loss of availability of the Resource as shown herein (greater than a 5% mean wind speed reduction). Furthermore, the unexamined portion of the Practical Sailing Area would be even more impacted as it is closer to the Project and its wind impacts.

The Analysis itself begins with the statement: "there appear to be no specific criteria for minimum wind speeds to support 'good' sailing." With this caveat as a basis, how can the public have any confidence that this is a faithful examination of the potential impacts? If such a statement were true, then how would windsurfers decide where and when to go windsurfing? Do they simply flip a coin? What about professional forecasters? Does the same logic hold true for all sailing vessels? What about for any other weather or natural resource-dependent activity?

Not only is such a statement misleading, it effectively relieves the analyst from justifying the significance threshold used in calculating impacts. In fact, no justification is given in the Analysis for why the selected threshold used is appropriate for this location and how it translates to an actual change in availability of the Resource based on current established conditions for use of the Resource.

With no understanding of what constitutes specific criteria to support "good" sailing tied specifically to this site and its existing conditions and no justification for why the significance threshold is appropriate or meaningful for this location, one should reasonably question how the conclusions of the Analysis could be anything other than arbitrary.

In preparing the Analysis, it seems as though much work went into applying methods used in other projects having a fraction of the scale and much more detail than this Project. The Project and its surrounds encompasses thousands of acres and none of the building footprints, heights, orientations, finished elevations, site plan details, landscaping specifications, or other information is firmly known at this time.

Though the Analysis attempts to model a "worst case" impact scenario, it never explains the methods or justifications for why its chosen assumptions and shortcuts truly fit such an objective. Is it more conservative to model the whole project as a maximum height wall? What about the increased turbulence caused by surface roughness from gaps between buildings and varying building heights?

While work was going into building something that could be placed into a wind tunnel, no primary research was conducted to answer the basic question: "what constitutes minimum specific criteria for "good" sailing at Candlestick Park State Recreation Area?"

No surveys of users of the Resource were conducted, no exploration of existing data sources meaningful to users of the Resource, and no meaningful field tests were conducted or real-world observations made as far as we are aware. While field tests are not specifically required by CEQA, there is a requirement that the impact Analysis bear some realistic and demonstrable direct connection to the potential change in availability of the actual Resource concerned.

## 1.4 Goal of Comments

It is hard to read the Analysis and not objectively feel through the stark lack of detail and incompleteness as though it was but a token effort to "check the boxes" and placate the public interests with the minimum possible level of thoroughness. Much of the Analysis consists of cut-and-paste reductions of previous EIR even so far as to include substantial data from another EIR that did not even model the Project as far as we know.

We hope these Comments will assist the City of Brisbane and others in making sure that all practical diligence is pursued in evaluating the potential impacts of the Project in the focus of these Comments as with

the other potential impacts examined elsewhere in the DEIR.

Though this Project is arguably one of the largest and most ambitious in Brisbane's recent history, we are confident that Brisbane has every desire and all capabilities to meet and exceed the highest standards of excellence for considering and protecting public natural resources.

These Comments start from where the Analysis leaves off. They highlight critical assumptions and potential effects on the Analysis. They attempt to establish a conservative, realistic, calibrated, and actionable criteria for "good" sailing at CPSRA. They examine the potential Project impact on the actual usability and availability of the Resource in concrete absolute terms that are meaningful to the lay public.

Based on this work, these Comments demonstrate that the potential impact due to this Project on the Resource is unsurprisingly quite significant.