



San Francisco Group, SF Bay Chapter
Serving San Francisco County

Date: July 27, 2021

To: SF Municipal Transportation Authority Board (SFMTA)
SF Recreation and Park Commission (SFRPC)

Re: Upper Great Highway - Need for an Environmental Impact Report (EIR) evaluating the five Pilot Project options

The Sierra Club has been following the public process for the future of the Upper Great Highway. We do not as yet have a position on this project. We understand that the City will soon be choosing one of five options for a Pilot Project, which would run for up to two years. This would be in addition to the over 16 months that the Highway has already been closed to car traffic. However, to date there has been no environmental analysis of either the past 16 months' impact or of the five proposed options and their potential impacts.

It is tempting to look at the Upper Great Highway as an isolated roadway. On the contrary, the Upper Great Highway is just one piece in the overall ecosystem that includes Ocean Beach, the dunes between the Upper and Lower Great Highway, the Lower Great Highway, parts of the Outer Sunset and Golden Gate Park. The City's five options may have both negative and positive impacts on these areas. We are asking that an Environmental Impact Report (EIR) be written that takes into account both the individual and the cumulative impacts on all of these areas.

The purpose of performing a CEQA review is, "to inform decision makers and the public about the potential environmental impacts of proposed projects, and to reduce those environmental impacts to the extent feasible."¹ Some areas that should be covered in an EIR are:

- What will be the net increase or decrease in greenhouse gases caused by eliminating cars and increasing bicycle use on the Upper Great Highway vs. causing an increase in stop and go traffic through the neighborhoods?
- What will be the impacts of the increase in human encroachment with increased use and unregulated crossings on the dune habitat on both sides of the Upper Great Highway vs. the impacts of the lack of cars on wildlife fatalities?
- The western end of Golden Gate Park is designated to be the wildest section of the Park and provides a sylvan respite for humans. What will be the impact of the increase in the amount of rerouted traffic through Chain of Lakes Drive, the possible introduction of urban style traffic lights, and the possibly of channeling of heavy traffic onto Martin Luther King Drive within the Park?

¹ <https://opr.ca.gov/ceqa/>

- The Recreation and Park Department has already proposed introducing a skatepark, food trucks and entertainment to the Upper Great Highway. What activities will be installed or supported in each option and what will be the impacts of each of those activities?
- What will be the increase in artificial lighting, and what will be the impact on both wildlife and Dark Skies?

These are not all of the possible impacts --a Notice of Preparation and a Scoping Session would bring out the various issues that should be covered in an environmental review.

Evaluating environmental damage after a Pilot Project has been in place for two years - or in this case a potential total of over 3 years - is a bit like closing the barn door after the horse has escaped. Therefore, the Sierra Club requests that there be an Environmental Impact Report (EIR) as soon as possible and before a Pilot Project is selected and implemented.

Sincerely,

Becky Evans

Becky Evans, Chair
SF Group Executive Committee

cc: Board of Supervisors
Department of Recreation and Park
Planning Commission
Planning Department
California Coastal Commission