

July 31, 2015

Tim Ramirez, Director of Natural Resources, Water Enterprise  
San Francisco Public Utilities Commission  
525 Golden Gate Avenue  
San Francisco, CA 94102

*Re: SFPUC's Proposed Sunol Corp Yard Expansion into the AgPark*

Dear Tim:

This letter is written on behalf of Save Our Sunol, Alameda Creek Alliance, SAGE and the Sunol AgPark farmers. We are writing to ask the San Francisco Public Utilities Commission (SFPUC) to reject any proposed amendments to the Preliminary Mitigated Negative Declaration (PMND) for the Sunol Long Term Improvements Project (Planning Department Case No. 2012.0054E) that involves significant impacts which cannot be adequately mitigated. At a community meeting on July 22, SFPUC announced its intention to expand the Sunol corporation yard footprint into the AgPark in order to expand the vehicle and fuel storage yard. The proposed expansion would take 200-300 feet (approximately 4.5 acres) of prime agricultural land out of production.

This sudden announcement and disregard for the social, ecological and economic importance of the lands surrounding the Sunol Water Temple stands in stark contrast to the last five years of community involvement and planning related to the development of the land, including renovations to the Corp Yard. We oppose the ad hoc amendment to the approved plan because it will consume irreplaceable resources, and reasonable alternatives exist. We understand that since the July 22 community meeting and due to input at that meeting, SFPUC staff is undertaking a review of alternative options. We also understand – and appreciate - that this review is being expedited and we can reasonably expect an update from the SFPUC with preliminary results from this review by the second week of August.

The 18 acre organic AgPark provides significant social, economic, and ecological benefits that clearly outweigh the value of the land as a parking lot. The farmland in question is irreplaceable. According to the 2013 Alameda County Crop Report, there are 81 acres of vegetable crops farmed in Alameda County (down two acres from 2012) with an average value of \$12,500 per acre. Thus losing 4.5 acres would represent an economic loss of over \$50,000. Further, this farmland gives 12 farmers a place to develop farm businesses that serve markets in three major metropolitan areas. SAGE and the farmers were heartened by SFPUC remarks in meetings earlier this summer to the effect that the SFPUC is inclined to continue the AgPark model.

The 4.5 acres the SFPUC Corp Yard proposes to annex have been cultivated using sustainable agriculture practices over the past nine years. As a result this land now provides far more ecological benefits than when it was managed as a hay field. Under continued organic management as productive farmland these acres will continue to increase in soil fertility and to provide ecosystem services including pollinator and wildlife habitat and carbon sequestration and water retention attributes. These ecological benefits also translate into increased economic value for current and future farmers.

The organic farm land at the Sunol AgPark not only feeds families throughout the greater East Bay area; it also allows for opportunities for learning and connection for thousands of school children and community members. The SFPUC itself, by providing an annual grant for the Sunol AgPark education programs, has been a foremost proponent of this central AgPark function.

We are confident the SFPUC will not approve the proposed annexation of prime farmland at the Sunol AgPark. The City of San Francisco Charter governing the SFPUC states as an explicit goal that the SFPUC shall “Protect and manage lands and natural resources used by the Commission to provide utility services consistent with applicable laws in an environmentally sustainable manner.” The SFPUC has publicly committed, through its published Strategic Sustainability Plan and Strategic Sustainability Annual Report, to manage to measurable sustainability indicators including increase in habitat, and decrease in storm water run-off.

Removing habitat to create a parking lot would be a step back from the SFPUC’s proposed goals. Further, through soil building techniques such as cover cropping and mulching, farmers have significantly increased the rate of water retention in the soil. According to a paper published by the NRCS, a one percent increase in soil matter can hold an additional 19,000 gallons of water. How much water can a parking lot retain, even if graveled? This expansion would significantly negate the sustainability indicators which the SFPUC put forth in their sustainability plan.

Lastly, with close to five years of intense planning by countless staff and community members, it remains unclear as to why suddenly this expansion has been proposed. With all that stands to be lost with the conversion of this prime farm land to storage space, and the loss of good faith with the community, the question begs to be asked, why? If storage space is such a critical need that it warrants sacrificing a portion of a scarce resource and community good will, why wasn’t this recognized earlier? The SFPUC has not quantified these new vehicle storage needs, nor has it demonstrated that these additional space needs cannot be accommodated on the current Corp Yard site plan, through an alternative, more space-efficient site plan, or in another area managed by the SFPUC.

For these reasons, we ask the SFPUC to develop an alternative plan for parking, one that does not involve the conversion of prime farm land. Re-design options include: consolidating single-story structures into two-story structures; siting buildings to minimize footprint and maximize the space for additional outdoor storage needs; and utilizing additional small spaces along the entry road and the strip of land on the adjacent SFPUC Hanson quarry lease west of the berm surrounding the active quarry area. These ideas, and likely others, should be carefully considered in order for the SFPUC to avoid the proposed expansion and to demonstrate its commitment to manage resources to the criteria in its published Strategic Sustainability Plan. Were the SFPUC to re-design the project in this manner, our organizations would support issuance of an addendum to the existing PMND to incorporate these design changes. We are confident the community can work together with the SFPUC to develop a re-design that satisfies all parties.

If the SFPUC is unwilling or unable to make design changes such that the project footprint will not encroach into the AgPark, the impacts to prime farmland will be significant and cannot be mitigated. A Mitigated Negative Declaration (MND) would clearly be inadequate under CEQA and the Planning Department would be legally required to prepare an Environmental Impact Report (EIR) for the Sunol Yard improvement project. In this instance, our organizations would request that the SFPUC bifurcate the

Watershed Center portion of the project and proceed under a separate MND for the Watershed Center, and prepare a separate EIR for the Sunol Yard improvements.

This letter provides you with substantial evidence that significant effects may occur as a result of changes to the design and footprint of this project and the project has not yet been revised to avoid these significant effects or mitigate them to a level of insignificance. An EIR must be prepared when there is substantial evidence in the record that supports a fair argument that significant effects may occur (PRC §21080(d)).

We request that you respond to this letter by August 10, with an update on the SFPUC process and findings to date, and with a specific date by which you expect a final draft determination will be issued for the Corporation Yard site plan.

Sincerely,

Jim O'Laughlin, Sunol Resident and Vice-President, Save Our Sunol

Jeff Miller, Executive Director, Alameda Creek Alliance

A handwritten signature in cursive script, appearing to read "Sibella Kraus".

Sibella Kraus, President, Sustainable Agriculture Education, and the Sunol AgPark farms (Baia Nicchia, Happy Acre Farm, Namu, Blooma, Feral Heart Farm, Root & Bloom, Jellicles and Majid's Farm)