



San Francisco Group of the San Francisco Bay Chapter

Reply to:  
Sierra Club, San Francisco Group  
1474 Sacramento St., #305  
San Francisco, CA 94109

September 5, 2017

V. Fei Tsen  
Chair, TIDA Board of Directors  
One Avenue of the Palms, Suite 241  
San Francisco, CA 94130

Dear Chair Tsen:

I write on behalf of the San Francisco Group, Sierra Club regarding proposed development of Clipper Cove and particularly the recent marina expansion proposal presented by Treasure Island Enterprises (TIE) at the TIDA Infrastructure and Transportation Committee on February 15, 2017. We strongly urge you to reject the current marina proposal submitted by Treasure Island Enterprises.

The San Francisco Group has considered this proposal and found that the scale of the marina as currently proposed is much greater than can be accommodated without significant negative impact on public recreation on the San Francisco Bay. A report issued by the Treasure Island Sailing Center (TISC) in May of 2017 details how the proposed marina would incur significant negative impacts on public access, including a dramatic reduction in access to the Cove for youth.

The Club is also deeply disturbed by potential impacts on the eelgrass beds on the south side of Clipper Cove, the potential impacts on views of open water, and the potential restriction of space for anchor-outs.

An April 2017 assessment of the TIE marina proposal by the California Division of Boating and Waterways revealed, for the first time on record, that the wave attenuator wall proposed for the marina might change siltation patterns in the Cove. **The Club notes that changing siltation in Clipper Cove could dramatically impact existing eelgrass beds on the south side of the Cove.** Wave attenuators and even marina docks and boats in the marinas have the well-documented potential to affect eelgrass adversely.<sup>i,ii</sup> This risk and potential outcome does not appear have been considered or evaluated in any way by the 2005 project EIR for the proposed marina.

The DBW assessment notes that the seawall attenuator proposed by TIE “typically results in the deposition of silt,” and estimates maintenance dredging

for an entrance channel will cost \$150,000 yearly and further notes that the San Francisco Marina now spends \$500,000 annually to resolve unanticipated silting that occurred after the installation of a wave attenuator there.<sup>iii</sup> Silting is also now occurring in the inner basin of the San Francisco Marina posing additional significant costs.

DBW reports that two other DBW loans in the Bay Area have “defaulted due to improper proper budgeting for siltation. DBW also notes that in an earlier financial pro forma submitted to DBW in December 2015, TIE estimated maintenance dredging at \$374,000 annually.

In response to this DBW finding, the developers formally responded to DBW by stating: "TIE is unable to provide DBW with a cost estimate or rate of occurrence for future dredging given the fact that it is impossible to know how slow or fast siltation may occur at Clipper Cove and other intangibles that will only be proven over time."<sup>iv</sup>

This is a clear and documented admission by the project developers that they have not properly considered, identified, nor provided mitigation measures for changing siltation patterns in Clipper Cove due to development of the proposed marina. No marina development of any scale should proceed in Clipper Cove until the risk of changing siltation is properly evaluated and the necessary mitigation measures identified.

The Treasure Island Sailing Center developed two alternate scenarios to illustrate different options for development of a marina in Clipper Cove. We have reviewed these scenarios as well as various proposals by the developers. The Group has endorsed the Sailing Center’s minimum impact option as the best proposal presented for development of a marina in Clipper Cove. The minimal impact option is designed to allow for a doubling of the number of berths in the marina, and an increase in the average berth length from 31’ to 42’. While this expansion is dramatic, the impact on current use of the cove would be minimized.

On behalf of the SFGGroup’s 9600 members and countless others who use Clipper Cove, I urge you to reject the current marina proposal submitted by Treasure Island Enterprise and turn instead to consideration of the minimal impact proposal.

Sincerely,



Becky Evans  
Chair, San Francisco Group

CC:

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<sup>i</sup>Merkel, K.W. 1991. Identifying impacts and developing mitigation for eelgrass (*Zostera marina*) meadows within developing and expanding marina. In: Ross, N.W. (ed.). 1991 Marina Research Reprint Series. International Marina Institute, Wickford, RI

<sup>ii</sup> Keith Merkel, Merkel and Associates, August 2017: email communication on file.

<sup>iii</sup> See pages 3 and 12 of DBW report "Treasure Island Marina Feasibility Report," April 5, 2017.

<sup>iv</sup> See page 3 of DBW report "Treasure Island Marina Feasibility Report," April 5, 2017.