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John O. Tulloch  
Interim City Clerk  
City of Piedmont  
120 Vista Ave  
Piedmont, CA 94611

**RE: Comments on Next Steps for Blair Park**

Dear Mayor and City Council:

I have sent as a separate letter my technical comments on the adequacy of the EIR. As set forth in those comments, I believe the EIR fails to meet the minimum standards of adequacy and needs significant additional work prior to certification. This letter is not intended to supplement those comments, but is focused on the overall process and some recommendations as you move forward to the next step which, as I understand it, is to refer the EIR to various commissions for comment and a recommendation.

As I have previously said to you, preparing an EIR is not a substitute for a planning process. Unfortunately, the EIR before you bears out my concerns. The EIR is about identifying the significant environmental impacts of the project. And while it does do that to some degree – albeit highly inadequately – it helps very little to resolve the fundamental issues that are associated with this project. Many of the most important questions have yet to be answered. Before you send this on to your commissions, I urge you to obtain some essential information and provide direction in regard to the choices that must be made. There are three basic questions which I urge you to answer before sending this on to the City's commissions:

- What is the "preferred project" that you would have the commissions evaluate?
- How much does the project cost and who pays?
- What is the range of alternatives that they can consider?

I have elaborated on each of these points below.

Project Definition

As someone who is following this project fairly closely, I no longer have any real information as to what "the Blair Park project" is – and also questions as to the Coaches Field project. The EIR defined a project that includes a bridge, an inadequate parking lot and artificial turf. The project with mitigation now includes a crosswalk that has yet to be definitively located (and its safety evaluated), a new walkway, and 22 new parking spaces which we are assured all can be fit into this highly constrained site without any significant changes to the proposed site plan. The pretty picture being used by the project advocates does not seem to be the same picture as the one in

the EIR. And the water quality and other toxic impacts of using artificial turf seem to call into question whether this element is viable.

While the Commissions will want to consider these issues on their own, the parameters for the project description should be better defined: what is on the table, and what is off. To the degree that significant elements have changed, I urge the Council to have the project design team modify the design and provided the community with a revised "preferred project" design so that the rest of us have some opportunity to comment on the project that will go forward for commission consideration.

### What does the Project Cost?

Once the Council has better defined the parameters of the project and there is a new schematic design, please obtain an independent cost estimate. The fact that this is a so-called gift does not reduce the need to consider this issue - in fact, it makes it even more imperative. There is a huge difference between raising \$5 million and \$20 million. At this point, there is no information as to what the cost of this project will be. There is a great deal of dissension in the community over this project, and it would be extraordinarily unfortunate if we continue down this path and find at the end that there is little or no hope of raising the amount of money necessary to build it through donations. There are many serious reservations about the meaning of this "gift" in relation to the degree the public will have access to this public park. But putting aside those reservations, if the cost to build it is so high that additional city funds will be necessary to build it, then this project must be weighed against the other needs of this community - a weighing that the Council has chosen not to do because it is an alleged gift.

Finally, in considering the cost of this project, please also obtain estimates of the cost of maintenance. Because of the design of this project, the recommendations of the Regional Water Quality Control Board for a less expensive landscape-based treatment system for stormwater is not being implemented, and instead the project includes a very expensive to build and maintain mechanical treatment system (Draft Response to Comments, letter A-2). Rather than other means of holding water on site, the site plan proposes massive underground storage tanks that will also have to be maintained. The restrooms will need regular maintenance, and the artificial turf will need to be maintained and repaired and eventually replaced, requiring a long-term replacement fund. The crosswalk and warning signals will have maintenance costs. There is no indication that the sports clubs will pay for this maintenance. Even if they did agree, they have no idea what that cost may be. If they do not pay, how will maintenance of these facilities affect other city parks and open space at this time of limited public resources? In this budget climate, it would not be prudent to construct a facility without a clear source of funding for maintenance.

### Range of Options

When this EIR began, we were assured by the then Mayor that the EIR would consider a range of alternatives. It did not. No off-site options were explored in any serious way. Even some in-Piedmont options that might satisfy some of the advocates needs were not fully considered - and knowledgeable community members are still generating options. While we do not yet have a financial cost estimate, we do know that this project is dividing the community and has significant environmental costs that cannot be mitigated. Once there is a cost estimate for building and maintaining this project, the community will have a better understanding of what can be feasibly constructed on this site. I urge you to continue to leave open the option that

commissions consider other ways of addressing the need for sports fields, including outside Piedmont options.

Thank you for considering my suggestions and I look forward to your response.

Sincerely,

Dan Marks