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From: Ken Koretz  
Date: August 9, 2010  
Re: **Comments on Draft EIR – Moraga Canyon Sports Field Project, Piedmont, CA**

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The Moraga Canyon Sports Field Project (“Project”) and the Draft Environmental Impact Report (“DEIR”) of the Project prepared by LSA Associates, Inc., dated June 2010 reach the following flawed conclusions:

1. Though traffic safety and congestion at the Piedmont-Oakland border are material problems, their solution can be deferred until after the Project is approved and built
2. The Project design and mitigations should appease Piedmont constituents

In fact, traffic safety and congestion deserve resolution before incremental canyon use exacerbates conditions. The Project’s effort to appeal to a broad range of Piedmont constituents will over-develop the site with consequences affecting both Piedmont and nearby Montclair (Oakland) residents. Mitigations proposed by LSA are insufficient.

### **I. Public Safety and Traffic Congestion at the Piedmont-Oakland Border is Urgent**

The ‘7-1/2 Second’ Window Applies to Cars and Pedestrians: Caltrans estimates “that a driver turning out of [a site into traffic] requires 7.5 seconds to complete the necessary maneuver.” (p. 253 footnote) The DEIR reports (p. 253) that on peak field use days there are – on average – 50 gaps in traffic per hour greater than 7-1/2 seconds that would permit safe egress onto Moraga Avenue. 85% of the time when cars are not speeding above 35 mph, a sophisticated driver exiting a Project parking lot or neighboring driveway has 7-1/2 seconds to look both ways, do the mental calculus of approaching car speed and distance and decide when to advance. (p. 254)

The City of Piedmont’s Policy 10.3 (p. 87) “to improve safety and ease of crossing Piedmont’s arterial streets on foot or by bicycle” and its Policy 12.2 (p. 87) to “maintain visibility and clear sight lines at intersections and driveways” do not legislate that child pedestrians must have the mental maturity to make these street crossing calculations.

The DEIR concludes that “Implementation of Mitigation Measure TRAFF-2A to meet Policy 12.2’s goals “does not mitigate the sight distance inadequacy at the proposed west Blair Park driveway exit to a less than significant level.” (p. 87) However, “Implementation of Mitigation Measures TRAFF-2B and TRAFF-3 would reduce ...operation period traffic and pedestrian safety impacts to a less than significant level.” (p. 257)

Project proponents bet that youth on foot, skateboard and bicycle will either climb stairs or take an elevator to a bridge, or if an illuminated crosswalk is installed in lieu of a bridge, resist the temptation to cross Moraga Avenue outside the approved crossing. Outside of the approved crossing, a dropped ball, lost shoe, run-away skate-board or approaching car speed misjudgment must be resolved within 7-1/2 seconds, on average, to prevent fatality.

Any one fatality of a child crossing Moraga Avenue where sight lines are impaired is ‘significant’. Could the DEIR drafters have set a higher fatality threshold to conclude that safety impacts are “less than significant”?

Harbord / Moraga Intersection: It's Not Just an 'Oakland Problem':

Land Use Policy 5.1 of the City of Piedmont – 2009 (p. 83) states that the “City would continue to monitor the intersection of Harbord Drive/Moraga Avenue” to see if a traffic signal is warranted. Policy 8.8 addresses 25-year increases in traffic.

Nevertheless, the DEIR states (p. 245) “When the four intersections” [including Harbord/Moraga] “are evaluated using the average delay experienced by all vehicles” [= 10.6 seconds] “rather than the worst case delay on the stop controlled approaches, the four intersections are forecast to operate at acceptable LOS” (level of service).

The current through-traffic on Moraga Avenue past the Harbord intersection is 19 cars per minute, forecast to grow to 23 cars per minute when Blair Park opens. (derived from vehicles per hour, p. 243, Table 4.7F) At one ‘through traffic’ car every three seconds, there aren’t – and likely won’t be – many 7.5 second gaps in traffic for northbound or southbound Harbord traffic to safely cross or turn onto Moraga, per Caltrans guidelines. Periodic higher-than-average through-traffic volumes further reduce the safe gaps.

How can the DEIR conclude, therefore, that a forecast *average* traffic delay of 134 seconds (= 2-1/4 minutes when the Project is complete) is satisfactory at the controlled approaches – with poor sight lines – on Harbord Drive at peak afternoon hours? Waiting that long certainly changes this driver’s psychology of risk. Inexperienced and elderly drivers who have also become impatient are at even greater risk of impulsive or flawed judgment.

Who exactly is inconvenienced at the northbound stop sign on Harbord? There are roughly 150 homes in the Montclair neighborhood south of Moraga Avenue (on Harbord, Wood, McAndrew, Lane and Marr) that are closer to the Harbord/Moraga intersection than to the adjacent Estates/Moraga intersection. At peak times, according to the DEIR, there are 30 northbound cars approaching Harbord/Moraga, and by extension 60 cars in 2-hour spans around peak times. These represent one-third of the nearby homes. With many residents still at work in the late afternoon, it’s illogical that a driver emerges from one-third of these Montclair homes in a 2-hour window. A probable alternate explanation, supported by observation from our vantage point at the crest of Harbord Drive, is that dozens of Piedmont residents funnel up Harbord Drive daily from and through the Blair Reservoir area towards Moraga Avenue, Montclair Village and Highway 13.

The delays at the Harbord Drive / Moraga Avenue intersection equally affect Piedmont residents. Before dismissing the waiting times at this intersection as ‘Oakland’s problem’ to be considered by the two cities’ Traffic and Safety Departments after Project development and only after crash statistics mount, both cities should commit now to permanently regulating traffic at one or more of the several intersections east of the proposed Project.

## **II. Project Design and Mitigations Don't Meet the Public's Needs**

### Moraga Tunnel Vision:

The DEIR states (p. 153) “Currently, the road corridor has very limited views [to motorists and other travelers] that include the northern slope above the roadway and mature trees lining the perimeter of the park.” This is not true! Views are not limited.

1,172 cars at peak morning hours and 1,143 cars at peak afternoon hours (p. 235) have an expansive view of calm open space in the Moraga Canyon park along the 3/10 of a mile stretch slated for conversion to the Project. Drivers, passengers, walkers and joggers currently see the 150 trees that will be removed and others that would be blocked from view by street-side berms and concrete retaining walls.

Instead of an open space view and use enjoyed by many, only several dozen soccer players, coaches and spectators would see the re-plantings at the field level on practice and game days. With Project development, drivers will forever see a 500-foot long almost continuous tunnel, 8-foot high at the east end to 25-foot high at the west end. The DEIR states (p. 7) that “the planting of replacement trees on and offsite would not replace the habitat values of the removed trees for at least several decades.”

A six-foot wide, ADA compliant public sidewalk, touted in the Project plan (p. 43), is not visible in any DEIR drawing or elevation. Given that the sidewalk is elevated to field level (8 to 25 feet above street level), it's hard to believe that passing vehicles will have unobstructed views along its full length to help ensure pedestrian safety on the sidewalk. And the 20-foot setback regulation for parks (City Code Section 17.11 for Zone B properties, pp. 75-76) that might provide drivers a clearer angled view of pedestrians on the sidewalk seems to have been ignored, or a waiver presumed.

The choice raised in Chapter 5 of the DEIR between “No Project” and some variation of fields behind a camouflaged tunnel is a false one.

Open space doesn't have to be occupied to be appreciated. Moraga Canyon can be jointly beautified for passers-by and users by the cities and residents of Piedmont and Oakland by removing invasive plants, maintaining existing trees, leveling small patches of land for picnics, installing safe playground equipment, and adding sculptural signage that welcomes residents and visitors to both Piedmont and to Oakland.

Parking Lots or Parking Littles?: The DEIR notes that Coaches Field has 44 spaces: 13 paved spaces in the main lot, 12 spaces opposite the main lot, 14 auxiliary spaces in the Corporation Yard for overflow on week-ends and during peak use periods, and 5 spaces along the drive. Project proponents argue that if 33 (of the 44) parking spaces are sufficient for one soccer field at Coaches Field, 66 spaces for Blair Park is ‘conservative’. (pp. 241, 242, 255)

The Project design provides 40 parking spaces in two lots. The DEIR lays the responsibility to create 26 additional spaces in the City of Piedmont’s lap.

Consider this:

- Coaches Field is designed for U8 and U10 games (see Appendix for dimensions) and therefore for team sizes up to 13 per side. U12 to U19 games that would be played on the Large Field at Blair Park could have rosters of 15 to 18 players per side, suggesting greater parking requirements.
- A minimum of one licensed referee and two club linesmen is acceptable for U9 through U15 games, per CYSA North - District IV rules. For U16 to U19 games, licensed assistant referees are recommended or required along the touchlines in addition to the licensed referee. Since soccer rules require that referees must be older than the players on the field, the assistant referees would be driving age and may need parking spaces, not factored into the Coaches Field calculation of one referee per team.
- Coaches Field has no staffed concession stand. Project concession stand staffing would add parking demand.
- Coaches Field has no restrooms. Project restrooms would enable more spectators (specifically seniors) to attend games, which would further increase parking demand.

Forty-four – not 33 – parking spaces available for one U8/U10 field at Coaches Field should be the starting point for Project analysis. One could argue that safe, peak parking demand approaches 90 spaces, not 66, even before considering incremental demand by players arriving early to warm-up for up-coming games. The parking shortfall to the Project design, therefore, would be 50 spaces, not 26.

Cupcake Traffic Jam: The DEIR offers Mitigation Measure TRAFF-1 to stagger practice and game activities on each field by at least 30 minutes to ease traffic congestion through, in and out of the parking areas. The level of service (LOS) for traffic smoothly entering Moraga Avenue would theoretically improve to 'E', still unsatisfactory. (p. 257) Unfortunately, strict interval enforcement for parking and drop-offs won't work.

A quick glance at the Appendix shows how minimum game intervals vary by age bracket from 60 minutes for U8's to 110 minutes for U19's. One assumes there would always be an U8 game on the Small Field and an older group on the Large Field. Also, according to JLYSL rules, teams forced to start late (or to take injury time-outs) have the right to finish full games, and therefore fall out of pattern for parking rotation.

Players must also discuss roster assignments and stretch before and after games. They gather gear, tape ankles and pick-up litter. There's a social aspect that can't be ignored. Spectators hang around to watch neighbors' kids on other fields. Young teams enjoy post game cupcakes.

Staggering games and practice is nice in theory, but there's no easy calculus for planners to get it right. Enforced car departures are impractical.

Health Risk: Notwithstanding signs for dog owners to clean up solid waste, wedging a Dog Run Area between the western parking lot and Large Field – exactly where kids will gather before games to dress and warm-up and to sit after games for snacks – displays gross disregard for human health.

Non-Conforming Field: Piedmont Soccer Club is one of six clubs that comprise the Jack London Youth Soccer Sports League, guided by common Rules of Play.

Coaches Field is 110 feet wide by 190 feet long, suitable for U8 and U10 games. For safe play and competitive reasons, JLYSL specifies the minimum field size for U8's as 90' x 150'. (see Appendix)

Coaches Field complies, but the Small Field at Blair Park is designed to be 75' x 150' and does not. The Small Field may be suitable for pre-game warm-ups for players assigned to the Large Field or other sports, but it is 15 feet too narrow for JLYSL inter-club play and therefore will not help alleviate Piedmont's acute field shortage.

## APPENDIX

### FIELD SIZE, ROSTER SIZE AND GAME LENGTH ASSUMPTIONS

The Jack London Youth Soccer Sports League (JLYSL) Rules of Play, dated August 1, 2009, and the California Youth Soccer Association (CYSA) North District IV Procedures, Rules and Regulations govern play, coaching and technical aspects of the game. Of import to Blair Park plans are field and roster sizes and game intervals.

#### Field Size (width x length, in feet)

	<u>Recommended</u>	<u>Minimum</u>	<u>Blair Park Specs</u>
U8	106 x 160	<b>90 x 150 *</b>	<b>75 x 150 (non-conforming)</b>
U10	150 x 210 **	108 x 180 *	150 x 300
U12	150 x 300	150 x 300	150 x 300
U14	150 x 300	150 x 300	150 x 300
U16	150 x 300	150 x 300	150 x 300
U19	150 x 300	150 x 300	150 x 300

\* JLYSL Rules including Appendix B - Rules for U-8's

\*\* CYSA Rules for Division III (competitive, not recreational) teams

#### Maximum Players

	<u>Roster</u>	<u>On-Field</u>
U8	11	7 *
U10	13 (14 – Dev III)	8
U12	15	11
U14	16	11
U16	18	11
U19	18	11

\* JLYSL Rules

#### Game Lengths and Intervals

All games have 5-minute half-times and no extra time added in the event of a tie, unless for lost time at referee's discretion. Full length games may be played at referee's discretion, even if started late.

	<u>Minutes Of Play</u>	<u>Game Interval - Minutes</u>
U8	4 x 10*	60
U10	2 x 25	70
U12	2 x 30	80
U14	2 x 35	90
U16	2 x 40	100
U19	2 x 45	110

\* For U8's, Piedmont Soccer Club differs from JLYSL guidance of two 20-minute halves