

August 9, 2010

City of Piedmont
120 Vista Avenue
Piedmont, California 94611
Attention: Ann Swift, City Clerk
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Response to Moraga Canyon Sports Fields Project Public Review Draft EIR

TRAFFIC

1. Background

In an attempt to save money, the City of Piedmont has received an inadequate traffic study. The original bid of \$59,000 from Fehr and Peers was rejected as too expensive. Piedmont asked LSA to add "traffic studies" to its existing EIR contract for the lowest cost possible. LSA agreed. Fee for traffic studies: \$23,000. (*March 15, 2010 city council staff report.*)

Traffic data collection in this low-cost EIR was insufficient, as explained below.

The Traffic Impact Analysis (contained in Appendix C to the Draft EIR) was written by a traffic engineer in Southern California. I had stressed in a public hearing that it is important for the EIR preparers to drive (and walk) Moraga Avenue and the side streets in order to understand traffic conditions in this canyon. Maps, photos and data are not sufficient.

Unrealistic assumptions have been made about possible traffic mitigation measures, possibility from lack of familiarity with Moraga Avenue, and are noted below.

Harbord Drive, Oakland, is the nearest street crossing Moraga Avenue from Blair Park toward the east. The EIR is extremely dismissive of any traffic problems that new sports fields will cause in Oakland, despite the fact that Blair Park is at the edge of the Piedmont-Oakland city limits. There was NO consultation with the City of Oakland during the preparation of the EIR, despite the December 17, 2009 letter from Wladimir Wlassowsky of the City of Oakland and letters of concern from Oakland Vice Mayor Jean Quan and Oakland City Council President Jane Brunner.

The failure to consult with the City of Oakland has produced problems with the EIR, as explained below. Accidents on Moraga Avenue in Oakland were not included in the EIR analysis; they should be included.

2. Projecting the Safety of Proposed Project for Drivers, Pedestrians and Bicyclists

The EIR states: The proposed project **is not expected to increase the accident rate** observed along Moraga Avenue. The majority of the accidents noted in the project area were related to driver behavior. (*Appendix C, Executive Summary, page 3*) Most all accidents are related to driver behavior.

The EIR assumes that these problems cited with the project will not increase the accident rate:

- a. Entering and exiting Moraga Canyon sports fields parking lots
- b. Children and adults crossing Moraga Avenue
- c. Line of sight. Traffic Impact Analysis, Appendix C, page 1 "The Blair Park driveways would not have adequate sight distance if the speed along Moraga Avenue continues to be 35 mph."
- d. Side street traffic attempting to enter Moraga Avenue from Maxwellton, Harbord and Masonic
- e. Drivers coming from the east attempting a left turn into Blair parking lots
- f. Impatient drivers waiting to exit the parking lots to turn left

3. Pedestrian Safety – How to Cross Moraga Avenue

The project includes a pedestrian bridge across Moraga Avenue to provide a safe crossing in a dangerous location. The bridge was intended to be ADA compliant, with an elevator and a ramp.

The EIR notes that the pedestrian bridge “has the potential to increase safety hazards for pedestrians...” and I am aware of the “darting” studies of human behaviour that lead to this conclusion.

Is a crosswalk, no matter what features it carries, feasible in this location? If so, why was it not originally proposed? The curves in the road, the slope of the canyon road, approaching lines of sight blocked by cliff sides and possibly berms, and speeding drivers will leave pedestrians at a crosswalk exposed to being hit by a car, even with a red light and cross walk. The fact that many of the pedestrians will be children heightens the risk to public safety.

“In the existing condition, there are residents who regularly utilize Blair Park for walking, exercising their pets, and other passive park uses. Some residents walk from their nearby homes and cross Moraga Avenue on foot to reach Blair Park. Because the roadway is relatively narrow, it is a short crossing and not necessarily dangerous if the pedestrian is aware of oncoming traffic.”
(Draft EIR page 256 paragraph 3.)

I find this statement outrageous. I am a pedestrian who refuses to walk across Moraga Avenue at Coaches Field because of traffic speeding around the curves. Trying to minimize the danger of the location is like a drunk thinking it is ok to drive if he doesn't get caught.

Where is the data that a pedestrian crossing is feasible and safe at this location?

The City of Oakland should be consulted regarding its experience with a lighted crosswalk on Moraga Avenue, near Montclair Park, to ascertain effectiveness and reliability.

If the crosswalk will make sounds of any kind to signal pedestrians, that sound should be included in Noise Studies because of the echo and amplification of noise in the canyon.

If Moraga Avenue must be re-graded to create a flat ADA-compliant crosswalk, the cost should be included in cost projections.

The EIR does not include what effect pedestrians crossing Moraga Avenue in a crosswalk will have on slowing traffic and closing the “gap” when cars can exit the sports fields parking lots and when cars waiting at Harbord Drive and Masonic Avenue can turn into Moraga Avenue.

4. Parking Lots

When the parking lot at Coaches Field is full, drivers will probably park in Blair parking lots and walk across Moraga Avenue to Coaches Field. This should be acknowledged in the EIR regarding pedestrian safety and parking capacity.

The parking at Coaches Field is too limited to meet the demand. The parking demand at Blair cannot be based on the size of the parking lots at Coaches Field and the limited data collected for this purpose in the EIR.

Parking projections for Blair parking lot should include an allowance for anyone who uses the proposed “dog run.”

How will “convenience” parkers be handled – those who may wish to meet a car pool in the Blair parking lot, for example? This should be made clear as part of the parking study so that sports fields drivers will not be forced to park in front of homes on Moraga Avenue.

5. Projecting the Effect of Proposed Sports Fields on Oakland Traffic

Acknowledging that the proposed sports fields will create additional traffic on the nearby Moraga Avenue/Harbord Drive intersection, the EIR notes:

“The unsignalized intersections do not meet the signal warrant in the a.m. and p.m. peak hours for all conditions with the exception of the intersection of Harbord Drive/Moraga Avenue, located in the City of

Oakland, during the opening year plus project condition (i.e., the anticipated baseline project.) The increase in project traffic in the east and westbound directions during the p.m. peak hour **would increase the southbound delay at this intersection.**

"This delay triggers Signal Warrant Rule #1 (delay based on vehicle hours). As noted in the Manual on Uniform Traffic Control Devices (MUTCD), "the satisfaction of a traffic signal warrant or warrants shall not in itself require the installation of a traffic control signal."

"Prior to installation of a traffic signal, further study including the overall location, operation, safety, and traffic flow should be conducted. The decision to install a traffic signal should be based on a number of factors, including the satisfaction of signal warrants. Other concerns, such as delay throughout the day, pedestrian volume, and crash history, should be monitored and evaluated prior to the installation of a traffic signal. **In consultation with the City of Oakland, the City should continue to monitor the intersection of Harbord Drive/Moraga Avenue for conditions that would indicate a traffic signal is needed**, such as an increased crash rate, use of the intersection by pedestrians and sustained traffic volumes throughout the day." *(Appendix C, page 3 and repeated on page 56)*

Where is the data that a traffic signal is feasible at this location? Does the topography and line of sight permit a traffic signal? Does it permit a stop sign on Moraga Avenue?

Why was the City of Oakland not consulted regarding feasibility, accident history, and cost?

Which city would pay for the suggested traffic signal? There is a long list of other intersections in Oakland that have been waiting years for a traffic signal. If the City of Piedmont proceeds to build a sports field in Blair Park, the City of Piedmont should install the traffic signal at Moraga and Harbord, before the sports fields are installed.

The EIR is deficient in dismissing this significant traffic problem with the phrase "should continue to monitor."

6. Traffic Data Collection

The extremely limited collection of data is insufficient to provide adequate information on which to draw conclusions regarding the proposed project.

Traffic data was collected on:

Tuesday, November 3, 2009 –7 am – 9 am and 4 pm to 6 pm – car counting and intersection turn volumes, *Appendix C page 14* (Maxwelton was conducted one week later, Nov 10, 2009.)

Wednesday November 4, 2009 3:40 pm to 4:10 pm - in 5-minute intervals – counted the seconds between cars passing by, seeking the number of 7.5 second intervals

Wednesday November 4, 2009 – Sunday November 8, 2009 – counted cars passing Coaches Field (via line across the street?)

Saturday, November 14, 2009 8:30 am to 5:15 pm, Coaches Field – counted number of people driving and parking at Coaches Field, number of people dropped off, number of people walking and number of people at the skate park. *Appendix C page 28.*

From these counts in November 2009, and inclusion of limited information from 2004 and 2008, conclusions were made about impact of the proposed sports project. I note that Dracena Park preferential parking for a few residents on Artuna Avenue (as evidenced by the discussion at the August 2, 2010 Piedmont city council meeting) was the subject of more traffic and parking analysis that is being paid to the large, permanent proposed Moraga Avenue sports complex.

7. Traffic Circulation – Returning to Piedmont from Blair Park

"The most direct route from the Blair Park site to central Piedmont would be to turn left from Blair Park onto Moraga Avenue...

"If, because of excessive through traffic on Moraga Avenue, it is not possible to turn left from the Blair Park driveways, then project traffic destined for central Piedmont may choose to turn right onto Moraga Avenue to Harbord Drive or Estates Drive, then navigate the various residential streets ...that lead from Harbord Drive or Estates Drive to central Piedmont. To determine whether a driver can safely turn left out of the Blair Park driveways, the gaps in traffic on Moraga Avenue were analyzed.

"The EIR consultants conducted timed gap surveys at the proposed project site on (Wednesday) November 4, 2009. The survey was conducted in 5-minute **intervals for a total of 30 minutes between 3:40 and 4:10 p.m.** According to the schedule for Coaches Field, sports practices begin at 4:00 p.m.; therefore, the 3:40 to 4:10 p.m. survey time is estimated to be a typical time when parents would drop off children for practice and leave the Blair Park driveways. (When would parents pick up their children? During rush hour?)

"The results of the timed gap surveys are provided in Table J. As shown in the table, there are approximately 50 opportunities (i.e., gaps greater than 7.5 seconds) within the 30-minute interval where future traffic can manage a left turn out of the Blair Park driveways.

"The highest left-turn volume out of each driveway is 44 p.m. peak-hour vehicles. Therefore, based on the gap survey data, there are adequate gaps to accommodate the left-turn forecast outbound volume of the proposed Blair Park sports fields.

"Therefore, the need to negotiate a windy, narrow, longer, and slower route to southerly destinations would not be necessary. Cut-through traffic does not present an attractive alternative given the empirical evidence to the contrary.

"The project traffic will not significantly increase cut-through traffic along Harbord Drive and Estates Drive in the City of Oakland."

How is that conclusion derived when compared with the EIR note that drivers exiting Blair parking lots and making a left turn will experience delays resulting in an unacceptable LOS. (*Appendix C page 29 and 36*)

To base conclusions on future traffic patterns based on **one 30-minute observation on a Wednesday at 3:40 pm is extremely insufficient.** The reason given for the time period measured is that it is based on a 4:00 pm practice time scheduled at Coaches Field.

What about the 5 pm pick up time at Blair Park? How much time is there to make a safe left turn out of Blair parking lots to return to Piedmont?

What is the effect of drivers exiting two Blair parking lots and attempting a left turn during rush hour? On a weekend?

Drivers attempting to turn left from the parking lots will have to wait for sufficient lack of traffic coming uphill from the left and downhill on the right in a twisting canyon road notorious for speeding traffic. Is 7.5 seconds adequate to make a safe left turn under these circumstances?

Would not impatient drivers decide to make a right turn out of the parking lot instead of waiting for a clearing to turn left? Such a maneuver would require the driver to either turn right on Harbord and enter residential neighborhood or perhaps attempt a U turn on Moraga Avenue to return to Piedmont.

Observation and testing during rush hour is necessary before the following three conclusions are valid for drivers exiting Blair parking lots and trying to make a left turn safely:

a. "Queuing of vehicles waiting to turn left out of the Blair Park driveways was examined to ensure that excessive stacking of vehicles within the parking areas would not occur. According to the queues calculated

during the LOS analysis, the maximum queue would be two vehicles at the west driveway and three vehicles at the east driveway. The site plan provides adequate distance without significantly affecting on-site traffic operations."

b. "Previously, mitigation was recommended to alleviate the LOS deficiency observed at the Blair Park driveways. The mitigation measure would require that the schedules of the two proposed fields be staggered by at least half an hour so that drop-off and pick-up operations occur throughout the hours that the fields are utilized rather than in a single 15-minute period each hour."

c. "Implementation of this mitigation would also increase the gaps available to exiting vehicles, as the vehicles would be spaced throughout the hour. As a result, use of the cut-through route through local neighborhoods to travel from the Blair Park site to central Piedmont would not be warranted, as sufficient gaps in traffic would be available for making left turns out of the site."
(Appendix C Pages 52 – 54)

What is the safety level if a driver is trying to make a left turn while exiting the east Blair parking lot and a driver on Maxwellton turns either right or left to Moraga Avenue? This area is already the site of automobile crashes and the traffic complications of this project will increase the danger.

8. Volume of Traffic Now

EIR page 236: "Historical traffic volume counts indicate a reduction of approximately 2 – 3 % per year from 2007 to 2009... The historic traffic count data, reflecting a decline in daily traffic, conflicts with the ACCMA growth forecasts ...To account for the differing sets of data, and to more accurately reflect the actual potential growth rate of traffic along Moraga Avenue, the two data sets were interpolated."

Very recent trends should not be extrapolated into the future, unless the causal factors are well understood.

I have observed the decrease in traffic on Moraga Avenue. It is now easy to park on the streets in nearby Montclair Village; it was often impossible to find parking two years ago.

The unemployment rate in Alameda County is 11% now. Two years ago it was 5%. There has been no significant local change which would suggest that ACCMA's long-range projections be tampered with - no loss of local housing, no closing of major employers, etc.

The EIR traffic assumptions should adhere to ACCMA's traffic growth projections and those contained in Piedmont General Plan.

9. Volume of Traffic If the Project Is Built

There are no true projections of the expected traffic to be generated by sports fields in Blair Park. Instead of drawing up a calendar, with realistic assumptions about the numbers of games and practices each day for an entire year, the reserved time at Coaches Field has been used.

"Scheduled" simply means the field was reserved. I have seen records from several years ago where the Coaches Field was reserved 9 am to 5 pm every day – and not used.

The City of Piedmont has not produced an actual "use" log.

If future traffic assumptions for Blair are based on Coaches Field, how does one know if only one game was played at Coaches Field on that day of data collection?

As far as I can determine, all of the future Blair Park traffic projections were to be based on what happened at Coaches Field on Saturday, November 14, 2009.

"On that Saturday, the Piedmont Soccer Club was scheduled to use Coaches Field from 9 am to 5 pm." *(EIR pages 241 and 242)*

The field was reserved – we do not know what the actual USE was, but it appears that only one game was played that day, attended by about 100 people.

The EIR goes on “The existing counts taken in 2008 at Coaches Field are slightly higher than the (2009) operational analysis due possibly to the influence of the skate park, the number of games played on the day the counts were taken, or the overlap of parents picking up and dropping off children. Using the highest observed volumes (in this case, the 2008 counts...) provides for a conservative analysis of the proposed project.”

EIR page 241

Clearly, this project is trying to proceed without adequate traffic and use data.

The EIR is deficient in that it does not clearly state the assumptions about Blair Park:

1. Number of people who will be using the proposed fields each day, by month
2. Will all of the users be Piedmont residents? If not, from where will they be driving?
3. What is the maximum number of people using two fields at Blair Park, be it soccer, baseball, lacrosse or any other sport which could use the fields? Concession workers, spectators, dog walkers, and all other visitors should be included to derive a “worst case” for automobile traffic and parking.
4. Some soccer clubs split the field to get double use during practices. What is the “worst case” if this were to occur?
5. “Worst case” assumptions cannot all be based on the experience of one day’s soccer game at Coaches Field.
6. The DEIR states “based on correspondence from coaches whose teams practice at the existing facility, the average team size is approx 15 players.” One can assume there will be other teams using this higher capacity, larger field complex in the future, so analyzing only current conditions at Coaches is insufficient.
7. As indicated on EIR page 240, the project has the potential to ‘exceed the capacity of the existing circulation system.’ Proposing that one field alternative will be sufficient mitigation is only a claim, and not supported or fully developed with the points raised above.
8. What is the assumption concerning long term traffic growth after sports fields are built?

Here are the assumptions contained in the EIR regarding hours of use at Coaches Field:

“Existing Use. The field provides recreational facilities for youth sports and league play associated with baseball, softball, lacrosse, flag football, and soccer. Coaches Field is also used for various summer recreational programs and sports camps. The field does not have lighting and closes at dusk.

“In accordance with the use restrictions outlined in Section 3.9.3 of the City’s Municipal Code, games and practices begin no earlier than 8:00 a.m. and end no later than 8:00 p.m. Monday through Friday.

“On Saturday, games and practices begin no earlier than 9:00 a.m. On Sunday, games and practices begin no earlier than 12:00 noon. Games and practices end at 7:00 p.m. or dusk, whichever comes first, on Saturday and at 6:00 p.m. or dusk, whichever comes first, on Sundays.

“Based on a review of the 2007, 2008, and 2009 use calendars, **scheduled** use hours for the field average approximately 1,130 hours annually, factoring in field maintenance and rest periods for muddy conditions and restoration, which occur during much of January/February, July/August, and mid-November through December.

A summary of the scheduled use hours by month for each of these years is included in Table 3.A below.”
(EIR page 29 and 62 -63)

This data is insufficient - it is lacking information on when Coaches was actually used. Traffic cannot be projected based on what has been provided to date.

10. Direction of Traffic Arriving at and Leaving Blair Parking Lots

What will be the effect of driver's arriving from the east and attempting a left turn into the Blair parking lots during peak traffic hours? This cannot be determined unless a gap analysis is conducted at peak traffic hours.

The EIR notes that drivers exiting Blair parking lots and making a left turn will experience delays resulting in an unacceptable LOS. (*Appendix C page 29 and 36*)

The EIR refers to Figure 9 in Appendix C but it is unclear if the projections include assumptions about the proposed change at the east parking lot exit/Maxwelton.

The trip distribution analysis should not have split trips evenly between two parking lots but should have accounted for the difference in the sizes of the lots and the proposed passenger drop off area.

11. Unexplained Assumptions

EIR Appendix C, page 13: "It should be noted that the east driveway exit will reconstruct the intersection on Maxwelton Road/Moraga Avenue to include a south leg." Where is the design shown? How will a parking lot exit on one side of Moraga interact with Maxwelton on the other side of Moraga Avenue? What is a "south leg"? Has a pedestrian crossing been considered to provide a safe crossing for residents living on Maxwelton and nearby streets?

EIR page 59: "Right-turn deceleration lanes are provided at both inbound driveways." Where are the illustrations? It is difficult to imagine an additional lane provided for the west parking lot since the approach from Piedmont is on a curve.

Appendix C pages 221 – 225: Photographs of "field visit" show that there were large "SLOW" traffic signs and orange cones in Moraga Avenue alongside Blair Park that day. What was the date and purpose of the field visit? Was traffic data collected on the day that traffic was being slowed by signs and cones?

12. Analysis of the Reduced Blair Park Development Alternative

Apparently additional traffic modeling was conducted in June 2010, after Piedmont received the Administrative copy of the draft EIR in late May. (*EIR page 353.*) This change suggests that the 14-space parking lot at the west end of Blair Park remain as proposed but that the second parking lot of 26 spaces be moved to "east of the park building."

These statements (*EIR page 353*) are not supported by data and are insufficient:

- a. "Therefore, the significant and unavoidable impact related to outward bound left turns at these driveways would be eliminated under the reduced development alternative.
- b. "...it may be possible to reconfigure the driveways to allow for adequate site (sic) distance if the speed along Moraga continues to be 35 mph."
- c. "This (driveway changes) would eliminate the significant and unavoidable impact related to site (sic) distance.
- d. "One field, as opposed to two, could potentially reduce pedestrian safety impacts if less foot traffic is generated." (Fewer pedestrians may be hit if there are fewer pedestrians available to hit? This does not address safety of location and design.)

The vague "Reduced Blair Park Development Alternative" has inadequately presented, described and studied.

Moraga Avenue for Emergency Purposes

The Draft EIR is unresponsive to questions and concerns raised in the public scoping meeting and in written correspondence regarding this project's impact on Moraga Avenue as a designated emergency route for another wildfire in the hills, a 7.0 earthquake on the Hayward Fault and other disasters. A sample of those comments is listed below.

The City of Oakland has designated all of Moraga Avenue as an Emergency Evacuation Route in its General Plan. Why was the City of Oakland not consulted about the project's impact on their Emergency Response Plan? Piedmont, surrounded by Oakland, is also partially dependent on Oakland's disaster plans.

Blair Park is on my block. My neighborhood group of residents on Moraga Avenue, Harbord Drive and Templar Place has designated Blair Park as a staging area during a severe emergency if the destruction of homes and streets is too great. Removing a street level park and installing a high, fenced, locked sports facility effectively removes Blair Park as another staging site in this residential area.

Here is an example of public comments made in response to the Initial Study:

1. Public Response to Initial Study by Dan Marks

The statement in this section that the proposed project would not "impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan" is perhaps one of the more **egregious and clearly incorrect statements** in the IS. The preparers of the IS did not look at the city that surrounds Piedmont and which may be more affected by this project than Piedmont.

The City of Oakland has designated all of Moraga Avenue as an Emergency Evacuation Route in its General Plan (Figure 2.1, Public Safety Element).

As is acknowledged elsewhere in the IS, this area is subject to wildland fire hazard. I stood on my porch some years ago and watched with horror as a fire blazed through the Cemetery towards my home on Moraga Avenue. With different winds direction or a spark in a different location, a fire quickly sweeping through this canyon is not hard to imagine. The Oakland Hills fire of 1991 showed how fast such a fire can travel and move from wildlands into urbanized areas.

Clearly, the EIR needs to consider what happens when parents are desperately trying to reach their children playing in this isolated and steep canyon at the same time as it is crowded with vehicles using a designated evacuation route. The "no impact" statement here must be revised to a potentially significant impact. The City of Oakland should be consulted in regard to the impacts the project would have on its designated evacuation route.

Even if the preparers of this IS only looked at Piedmont, the "no impact" statement is clearly incorrect. The same paragraph claiming "no impact" states that arterial routes such as Moraga Avenue are likely to be designated evacuation routes depending on the nature of the disaster. The IS cannot have it both ways: indicating that the City is likely to designate Moraga Avenue as an evacuation route on the one hand, and saying that it need not evaluate the impact of the project on that route on the other.

2. Public Response to Initial Study by Susan Kahn

This item is wrongly rated as "No Impact." The Initial Study reads: *There are no designated evacuation routes in Piedmont.* Moraga is a major east-west traffic corridor. It is not solely for the use of Piedmont. The Initial Study does not appear to even *consider* the emergency needs of its neighboring city, Oakland. Blair Park is bordered on the north by the Cemetery and the Claremont Country Club, which means there are no through streets in those very large tracts of land, and therefore few side streets as well. On the south side of Moraga, the steep hill that borders the park means that there are no side streets for a very long stretch. Moraga Ave. is a vitally important evacuation route in the east-west direction for the Montclair area. It is dangerous and foolhardy to ignore that because it is not a "designated evacuation route" for *Piedmont*.

3. Public Response to Initial Study by Joannie Semitekol

Blair Park is logically a location to be utilized for emergency services after a disaster (earthquake). Currently emergency vehicles could drive onto site for staging. Proposed development would preclude this. Note that the adjacent Corporation Yard is 1 of the 4 location of emergency supplies for the City of Piedmont. Traffic congestion during peak sports times could seriously impede emergency vehicles through this major thoroughfare to Kaiser Hospital.

4. Public Response to Initial Study by Jane Brunner, President of Oakland City Council

* Impact on traffic circulation, including the major upstream and downstream intersections at Pleasant Valley Avenue, Highway 13 and Thornhill Avenue.

* Impact on emergency vehicles using Moraga Avenue of increased traffic and new turning movements at the proposed parking lots.

5. Public Response to Initial Study by Jean Quan, Vice Mayor and Oakland City Council

* Emergency Access-what measures can be instituted to assure safe access and egress in emergencies and disasters along this narrow, two lane road.

* Parking-is the parking sufficient for the anticipated usage of the fields. If not, where would the overflow parking go-and what is that impact on the surrounding neighborhoods?

* Public Safety- As the space is currently configured, it makes a natural staging site for post disaster activities. How can the proposed project accommodate this type of use and how will residents gain access to the site in a disaster situation'?

6. Public Response to Initial Study by Oakland Residents

PUBLIC SAFETY IN THE EVENT OF AN EMERGENCY

• Note: Moraga Canyon is a main thoroughfare for residents of upper Montclair to get to safety in the event of another major fire or earthquake.

• Moraga Avenue already has a very high level of vehicular traffic. What would happen in the event of an emergency when there is even more traffic?

• Ambulances, fire trucks and other public safety vehicles may not be able to get through Moraga Avenue in a sufficient amount of time to respond in an emergency situation on the playing fields, streets, homes and Highway 13 if traffic levels increase as a result of the project.

• Will converting the existing large space of Blair Park into an elevated area with fences and locked gates, stairs and elevator remove a critical staging area for emergency vehicles and services in case of earthquake, fire and other disasters?

The Draft EIR was unresponsive to questions and concerns listed above regarding this project impact on emergency access. The questions are still relevant and need to be addressed in a Supplement to the Draft EIR.

This letter has listed some of the Traffic Studies deficiencies which must be addressed, based on facts and data, in a Supplement to the Draft EIR.

Sandra Pohutsky

