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Bay Area birds since 1917*

January 19, 2011

Via U.S. Mail

Piedmont City Council  
Piedmont Parks, Planning and Recreation Commission  
Attn: John Tulloch, City Clerk  
Piedmont City Hall  
120 Vista Ave.  
Piedmont, CA 94611

Re: Moraga Canyon sports field project

Dear City Council members and City Commissioners:

I am writing on behalf of the nearly 10,000 members of Golden Gate Audubon Society to express our opposition to the proposed Moraga Canyon sports field project in the city of Piedmont. Since 1917, Golden Gate Audubon has been working to protect and conserve wildlife and their habitats throughout the Bay Area. Many of our members also live in Piedmont and use and enjoy this area.

Golden Gate Audubon's opposition is based in part on the destruction of natural habitat for birds and other wildlife, particularly the removal of 155 healthy trees, including 55 mature live oaks. The EIR found this to be a "significant impact" and states: "This would substantially reduce the habitat quality of the woodland by permanently removing trees that provide foraging, roosting and nesting habitat for a variety of native wildlife. Removal of the oaks would also conflict with Policy 13.4 of the City's General Plan regarding conservation of native vegetation." (EIR, pg. 170)

Indeed, it is clear from the EIR that if the proposed project goes forward as planned, it will result in the destruction of a great deal of natural terrain, removal of native trees, clearing of hillside underbrush, and construction of an artificial turf field, parking lot and other paved surfaces. It will introduce additional lighting, noise, trash and human-caused disturbances into the area. In short, it will ruin forever this quiet, secluded open space that is a haven for birds and other wildlife and will contribute to their continued decline in the Bay Area.

The proposed mitigation to replant 101 oaks primarily off-site —most likely outside Piedmont city limits — and to require the City to be responsible for "funding the planting, maintenance and monitoring of off-site replacement oaks" is, in our opinion, impractical, unsuitable and ineffective mitigation. Oak trees take decades to grow. Moreover, planting young trees in on land already protected and managed by the East Bay Regional Park District does not compensate for habitat lost at Blair Park (or within Piedmont). It is likely EBRPD land is already managed, at least somewhat, for the benefit of wildlife, meaning little benefit will accrue to wildlife. Even off-site plantings were successful, the project effectively removes available habitat from birds and other

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species for several generations while the replanted oaks grow. Meanwhile, many local and migratory bird populations will continue to decline.

The EIR identified 27 bird species found during only two surveys of wildlife in Blair Park. By constraining the wildlife survey window to such a short time, the EIR consultants failed to account for the variety of wildlife that use the site throughout the year. For example, on Dec. 19, 2010, members of Golden Gate Audubon's Annual Christmas Bird Count identified five species not included in the EIR list: Nuttall's Woodpecker, Red-breasted Nuthatch, Yellow-rumped Warblers, Oregon Juncos, and White Crowned Sparrows. Great Horned Owls have also been observed (and photographed) nesting in Blair Park. We are certain additional species would have been found had the EIR consultants conducted surveys during the fall migration period. Clearly, the EIR provides an incomplete picture of the site's importance for wildlife.

The EIR's unsupported contention that these bird species have adapted to "human-modified habitat" demonstrates a willful disregard for the reality faced by wildlife species struggling to survive in urban environments. Many of the songbird species found in Blair Park are declining in the Bay Area, primarily due to loss of habitat. For example, Nuttall's Woodpecker, like many woodpecker species, have decline as native trees—such as the 55 mature oaks proposed for removal in this project—have been removed. Frankly, the blithe conclusion that the species have "adapted" to suffering generation after generation of decline due to human activities undermines the credibility of the entire EIR.

Golden Gate Audubon urges the City Council NOT to approve this project as designed and to find an alternative solution. It is obvious that the topography of Blair Park is unsuited for large sports fields. The need for youth athletic fields is a regional issue and requires a regional solution. It requires cities working together to find large, flat, spaces that can be converted from other uses, such as parking lots or buildings no longer in use. In our increasingly urbanized area, the need to protect, preserve and maintain parks and remaining natural open space for future generations is as strong, if not stronger, than the need to build more sports fields.

Thank you for your consideration. If you would like to discuss this matter further, please do not hesitate to contact me at (510) 843-6551.

Sincerely,

A handwritten signature in blue ink that reads "Michael Lynes". The signature is written in a cursive, flowing style.

Michael Lynes, Conservation Director  
Golden Gate Audubon