



March 17, 2011

Via Email
Piedmont City Council
Piedmont Planning Commission
Piedmont Parks Commission
Piedmont Recreation Commission

Attn: John Tulloch, City Clerk
Piedmont City Hall
120 Vista Ave.
Piedmont, CA 94611
Email: jtulloch@ci.piedmont.ca.us

RE: Moraga Canyon sports field habitat protection measures

Dear City Council Members & City Commissioners:

I am writing on behalf of the nearly 10,000 members of the Golden Gate Audubon Society, many of whom live in Piedmont, as a follow-up to our letter dated January 19, 2011. In that letter, we expressed strong opposition to the proposed Moraga Canyon sports field project based on natural habitat destruction for birds and other wildlife. Our position remains the same and we urge you not to act in haste, but to explore alternates to the Blair Park site.

Please note that Piedmont's lease with the City of Alameda's soccer fields does not expire until September 30, 2012, which gives the City plenty of time – an entire year and a half – to explore more suitable in-fill sites, rather than taking up the last open space in Piedmont.

Should development of a soccer field of any scale proceed at the Blair Park site, we have outlined important steps below that must be taken at a minimum to reduce significant negative impacts to the environment. We urge you to ensure that these are taken in the event of any alteration of the landscape.

I. The Project Will Have Clear Environmental Impacts that Must Be Properly Addressed.

A review of the project proponents' plans A & B clearly indicate that there will be significant environmental impacts to the Moraga Canyon site's biological resources from the construction and installation of the play fields and related activities; and from the affects of human interaction due to playing sports, driving cars and eating in the area.

A. The Project Will Have Direct Negative Environmental Impacts that Are Not Adequately Addressed in the EIR.

These negative impacts include:

- Significant increases in human activities and traffic in the area;
- Significant alteration of the grass field, which currently provides foraging habitat for many species of birds, including Yellow-Rumped Warblers, Dark-eyed Juncos, White-crowned Sparrows, Golden-crowned Sparrows, California Towhees and American Robins;
- Increased automobile traffic, which will increase local air pollution, noise levels, and risks to other park users;
- Excessive cut and fill of up to 60 feet into the hillside of the oak woodland in Moraga Canyon, which serves as a vital wildlife corridor and provides habitat for a diverse array of species that include woodpeckers, Great Horned Owls and wild turkeys;
- The possible installation of 45' to 60' -tall lights at the site, which will affect local wildlife and fundamentally change the night sky character in the area;
- The removal of grass turf and the replacement with synthetic turf, which contains zinc, cadmium, lead and mercury at levels that may exceed state and national safety levels for drinking water, storm water, and direct exposures;
- Currently, synthetic turf must be replaced every 8-10 years and must be disposed of as hazardous materials;
- Likely increases in populations of animals attracted to food waste and trash, such as ravens crows, feral cats, raccoons, rats and other animals that prey upon native birds and other wildlife; and
- Increased noise from humans, public announcer systems and other loudspeakers that may cause disturbance to wildlife in the area and affect the natural aesthetic value of the area.

B. The Project Will Have Specific Negative Impacts to Biological Resources in Moraga Canyon.

In addition to the negative impacts outlined above from field construction, the project will have the following negative specific impacts:

- Retention ponds at Mt. View Cemetery are a water source for wildlife (especially the first unfenced pond that drains from Coaches Field). Contaminated runoff and drainage into those ponds will negatively affect wildlife;
- Coaches Field already compromised the Moraga Canyon oak woodland; a Blair Park sports field will cause further fragmentation of the oak woodland;

- The EIR states that the canyon below Coaches Field is isolated from Blair Park by Moraga Avenue. However, residents witness the wildlife corridor crossing at Moraga Avenue daily. This is further evidenced by the two fox and one fawn that have been hit and killed by cars in the past 6 months crossing Moraga Avenue. Clearly, wildlife move through the area. Increased fragmentation and obstructions to movement will pose additional risks to wildlife.
- The project will result in substantial loss of oak trees and Moraga Canyon's oak woodland habitat. The planting of trees is not an adequate mitigation measure. Mature trees provide important habitat values and replacement trees can take decades to reach maturity. Moreover, the removal of mature trees will likely remove cavities and snags, which provide essential habitat for cavity-nesting birds and habitat for other wildlife.

II. Measures Must Be Taken to Reduce the Environmental Impacts of the Project.

Even a cursory review of available information provides ample evidence that potential impacts are real and significant. (*See, e.g., U.S. Environmental Protection Agency, The Use of Recycled Tire Materials on Playgrounds & Artificial Turf Fields*, available at http://www.epa.gov/nerl/features/tire_crumbs.html). The impacts must be honestly assessed and properly addressed to provide as much habitat protection as possible.

To reduce potential impacts, the City should review the 2008 *Synthetic Task Force Findings and Department Recommendations* report which was submitted to the San Francisco Recreation & Parks Department and provided 34 recommendations and tasks that were intended to guide all artificial turf conversion projects in San Francisco. The findings and recommendations clearly anticipate that environmental and public health impacts are likely to occur as a result of grass to synthetic field conversions.

Recommendations in the report include:

- Prior to installation of synthetic turf, the agency should review all studies regarding toxic contaminants released by synthetic turf materials or created during installation;
 - The agency should track California EPA's studies regarding the effects of particulates from synthetic fields;
 - The agency should test runoff from the turf field and ensure compliance with the Clean Water Act, the California Safe Drinking Water Act, and other applicable laws and regulations;
 - The agency should keep abreast of studies regarding the safety and health effects of synthetic turf fields;
- The agency should coordinate with the California Environmental Protection Agency to conduct air testing at the site before and after the installation of the synthetic turf field;
- The agency should investigate options for turf products that do not contain zinc, lead or other heavy metals;

- When purchasing products, the Department should request full MSDS sheets from the manufacturers and share them with public health and environmental agencies and the public;
- The agency should not install the fields in areas that are prone to flooding;
 - All fields should be installed above the water table and feature state of the art drainage systems;
- The agency should include provide appropriate landscape and irrigation improvements around field projects;
 - The agency should consult with native landscape specialists to plant native, drought-tolerant and wildlife-friendly plants near field projects;
- Installation of the synthetic turf fields and associated infrastructure should be conducted in a manner that does not disturb wildlife.
- Removal of trees should be minimized, especially native tree species and trees with snags or cavities that provide habitat for birds and other wildlife.
 - Trees should not be removed during the bird breeding season (March 1 – July 31st of each year);
 - Trees should be monitored to detect potential disturbance impacts before they occur;
 - Construction crews and responsible agency supervisors must be educated that birds in the area, including the Red-tailed Hawk and the Great-horned Owl, are protected under the federal Migratory Bird Treaty Act, which makes it illegal to destroy their nest or otherwise kill native birds in the area.

In addition to the steps outlined above, the City should:

- Develop a Habitat Management Plan for the entire area that identifies impacts, proposed mitigations for the project, and ensures funding for native plantings and management to ensure impacts are adequately mitigated;
 - The Habitat Management Plan should forbid the creation of feral cat feeding stations in the area and designate that off-leash dog walking or play may only be conducted in designated, fenced areas;
- Fund biological monitoring in the area prior to and after construction to document changes in wildlife and habitat availability in the area;
- Reduce impacts installed lighting by requiring light poles be as short as possible and include only “cut-off” light fixtures, which minimize light spill and light pollution;
- Assure regular and efficient garbage collection at the site, including picking trash up from the ground and emptying containers, to prevent attracting non-native predatory animals and scavengers at the site; and

- Including water quality protections, such as swales and filtered storm drains, to remove trash, oils, sediment (including discharged rubber crumb from the fields), and heavy metals from being discharged from the site, especially in parking areas.

III. Conclusion

The California Environmental Quality Act is intended to ensure that a community that is potentially affected by a project is given adequate information to assess and comment on the environmental, social and cultural impacts of the project. To date, there has been no objective review of the extensive impacts of the Blair Park conversion project and the local community has been deprived of receiving adequate information to assess the benefits and costs of this significant change to Piedmont's last open space.

We ask only that the City of Piedmont be forthright with the community about the potential impacts of the project and make informed decision about shared open space. While we understand that financial and political incentives making this project appealing to the City, such pressures do not provide an excuse to deprive stakeholders of an extensive and comprehensive exploration of sound alternatives that could provide a win-win-win solution rather than cause untold damage to the natural surroundings and create animosity amongst the local residents.

Therefore, we ask that the City Council:

- Make a commitment to preserve and protect the last open space in Piedmont
- Designate a committee of seven people, with representation from Friends of Moraga Canyon, Piedmont Recreational Facilities Organization (PRFO), the Golden Gate Audubon Society and neutral members of the community to explore, identify and analyze preferred alternate sites over the next 2-3 months and present to the City Council at a future meeting for serious consideration. An open and transparent process of this kind must be put into place in order to be accountable to the public.

Thank you for your consideration of our comments. If you would like to discuss this matter further, please do not hesitate to contact me at (510) 843-6551 or mlynes@goldengateaudubon.org

Sincerely,



Michael Lynes
Conservation Director
Golden Gate Audubon