

## **ATTACHMENT F (A) Supplemental Public Comment on Initial Study and Negative Declaration**

Dear Mr. Jackson.

I am a Piedmont resident, and I write to you in utter disbelief regarding the Housing Element Initial Study-Negative Declaration which absolutely defies reality and common sense and utilizes disingenuous double-speak to obscure very significant impacts, especially to the Moraga Canyon community. Are we to believe that adding 575 housing units (+-1,500 people) with +-1,000 additional cars to a town of 11,270 people in 1.7 square miles will have NO major negative impacts?

How can you, in all sincerity and with honorable intentions as our City Planning and Building Director, declare that there will be “no impact” as building in Moraga Canyon relates to earthquake and wildfire dangers, transportation problems, traffic & safety issues and loss of wildlife habitat. The Housing Element Initial Study-Negative Declaration is inherently misleading, perhaps intentionally misleading, especially since no “studies” were actually conducted.

Looking at the Impact Analysis of the Negative Impact Declaration of the Housing Element Update, I would like to address each issue that should have been given a proper analysis:

### **1) Earthquake/Geologic Hazards**

The Hayward Fault and Chabot Fault Zones are approximately 1 mile from the Moraga Canyon area. It is absolute ridiculous and pollyannish to assert that damages from earthquakes are strictly limited to a 1-mile radius. No geologist would ever support this assumption which is inherent in declaring “no impact” considering the expectation for an upcoming 6.9 magnitude earthquake. Policy 18.1 of the Environmental Hazards Element of the Piedmont General Plan serves to restrict development on unstable sites, so how can the assertion be made of “no impact” without doing the proper studies to determine the stability of the Moraga Canyon site?

### **2) Emergency Response and Evacuation Plan**

Above Moraga Ave, the streets of Maxwellton Road, Echo Lane, Abbott Way, and Nelly Avenue are narrow, curvy and have no sidewalks for pedestrians. As it is, if there are two cars parked across from each other on those streets, emergency response vehicles have no access to fit through. In an emergency situation, while residents try to escape the neighborhood, they will likely block access for emergency vehicles attempting to get through.

My understanding is that the Housing Element Plan will not involve the construction of new roads, however it isn't feasible for Piedmont to provide safe evacuation routes in Moraga Canyon without building new roads. There will be so many additional vehicles as a result of new housing which will certainly increase delays for emergency response vehicles. With the addition of 130 new housing units in Moraga Canyon, how can anyone think that emergency response vehicles will have access on the existing narrow roads, especially when people are frantically trying to evacuate.

While the new structures may be built to meet fire code requirements, the fact is that the additional housing, residents and vehicles will hinder evacuation. The Oakland Hills fire in 1991 went up to the end of the cul-de-sac of Abbott Way. Given fast moving wind conditions, additional housing in this particular area will create disastrous and heartbreaking loss of lives in the future. It's not a matter of if another wildfire will happen, but when.

### **3) Environmental Setting**

Blair Park is a designated City Park and is not an “appropriately zoned vacant site.”

The development is NOT near public transportation, schools and retail, and it goes against the ethos of this plan by segregating low-income housing to the outskirts of town, completely ignoring multiple viable sites spread throughout Piedmont, especially in the center of town.

The Specific Plan is supposed to provide improvements to pedestrian and vehicular circulation. We know there will be an increase in traffic with additional housing units, and Moraga Ave already has fast moving, high traffic volume. Additionally, there is no safe pedestrian access to Piedmont City Center for school, retail, other services or public transportation. How can these issues be rectified without building new roads, which conflicts with a statement made in the Housing Element Plan.

The unspoiled natural environment remains a habitat for deer, fox, coyotes, turkeys, owls, red tail hawks, turkey vultures, etc. While this project may be exempt from CEQA regulations, it is heartbreaking to see development disregard the environmental impact to the area and to the wildlife that live here.

These are just some of the reasons I am urging reconsideration of putting high density housing in Moraga Canyon. This location does not serve existing or future residents. There are much better locations than the remote and dangerous Moraga Canyon for new housing!

Daphne Albert  
Abbott Way

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