



s a v e M O U N T D I A B L O

Board of Directors

Malcolm Sproul
President

Arthur Bonwell
Allan Prager
Vice Presidents

David Trotter
Secretary

Frank Varenchik
Treasurer

Burt Bassler
Don de Fremery
Dana Dornsife
Charla Gabert
Claudia Hein
Scott Hein
Michael Hitchcock
David Husted
John Mercurio
Amara Morrison
David Sargent
Sharon Walters
Directors

Staff

Ronald Brown
Executive Director

Seth Adams
Director, Land Programs

Monica E. Oei
Finance & Administrative Manager

Julie Seelen
Development Manager

Mailing Address

1901 Olympic Blvd., #220
Walnut Creek, CA 94596
Tel: (925) 947-3535
Fax: (925) 947-0642

Website

www.savemountdiablo.org

Founders

Arthur Bonwell
Mary L. Bowerman

November 6, 2007

Mr. Jason Burke
Planning and Building Department
City of Pittsburg
65 Civic Avenue
Pittsburg, CA 94565-3814

Re: comments, James Donlon Boulevard Extension Project
Notice of Preparation of Draft EIR

Dear Mr. Burke,

Save Mount Diablo (SMD) is a non-profit conservation organization founded in 1971 which acquires land for addition to parks on and around Mt. Diablo, and monitors land use planning which might affect protected lands. We build trails, restore habitat, and are involved in environmental education. In 1971 there was just one park on Mt. Diablo totaling 6,788 acres; today there are thirty-eight parks and preserves totaling almost 90,000 acres. We include almost 7000 donors and supporters.

James Donlon Boulevard Extension Project

We appreciate the work of staff on the James Donlon Boulevard Extension Project (Buchanan Bypass) and the opportunity to provide information on the project EIR's Scoping.

Save Mount Diablo does not yet have a position on the James Donlon Boulevard Extension Project (Buchanan Bypass) but we have many concerns.

1. We're interested in whether traffic studies will show that this project might benefit Pittsburg residents, or whether it will simply relocate bottle necks while inducing growth which will quickly overwhelm any congestion relief.
2. At first blush, the project seems simply to benefit Seeno Company developments to the east and west while opening up the Thomas Ranch to development, potentially eliminating agriculture on the Ranch's northernmost lands.
 - a. At one time the proposed Bypass started further east on lands now developed by the Seeno companies. As part of their development of the Black Diamond and Sky Ranch II projects they included or have

- proposed arterial level segments of this corridor—which clearly benefit their developments—where the Bypass had previously been proposed.
- b. Why should the city subsidize further development by undertaking additional segments?
3. The project would degrade views from Pittsburg, nearby public lands, and surrounding communities.
 - a. Significant visual analysis should be undertaken.
 4. It's important that a fiscal analysis be conducted for this project.
 - a. What priority does the project have in Contra Costa Transportation Authority lists?
 - b. Why was the project given this level of priority?
 - c. How much would the project cost?
 - d. How would the project be funded?
 - e. How does the project compare with other Pittsburg and regional transportation relief projects?
 - f. What would be the relative benefits of allocation of funding for this project compared to other projects being contemplated?
 5. The proposed project appears to be located further south than on the City's General Plan Map. This would greatly affect development implications for the Thomas Ranch.
 - a. Is the city contemplating a General Plan amendment?
 - b. How would such an amendment conflict with the voter-adopted Measure P?
 - c. Would the project have to go back to the voters?
 6. What is the position of the Thomas family on construction of this project almost entirely within their ranch? Much of the Thomas Ranch is Williamson Act Agricultural Preserve
 - a. What is the development potential of the Thomas Ranch?
 - b. How would this project support or inhibit development of the Thomas Ranch?
 - c. What would be the impacts on the viability of agriculture on the Thomas Ranch and in the area?
 7. Building this project has the potential to make the Thomas Ranch highly developable, and suggests the extension of city streets downhill into existing Pittsburg neighborhoods.
 - a. What would be the traffic impacts of these neighborhood connections?
 8. The project would affect Black Diamond Mines Regional Preserve in terms of proximity to the preserve, effects on views and resources, light & glare, traffic impacts on the Somersville entrance and the Nortonville easement.
 - a. How would impacts on Black Diamond Mines Regional Preserve be mitigated?

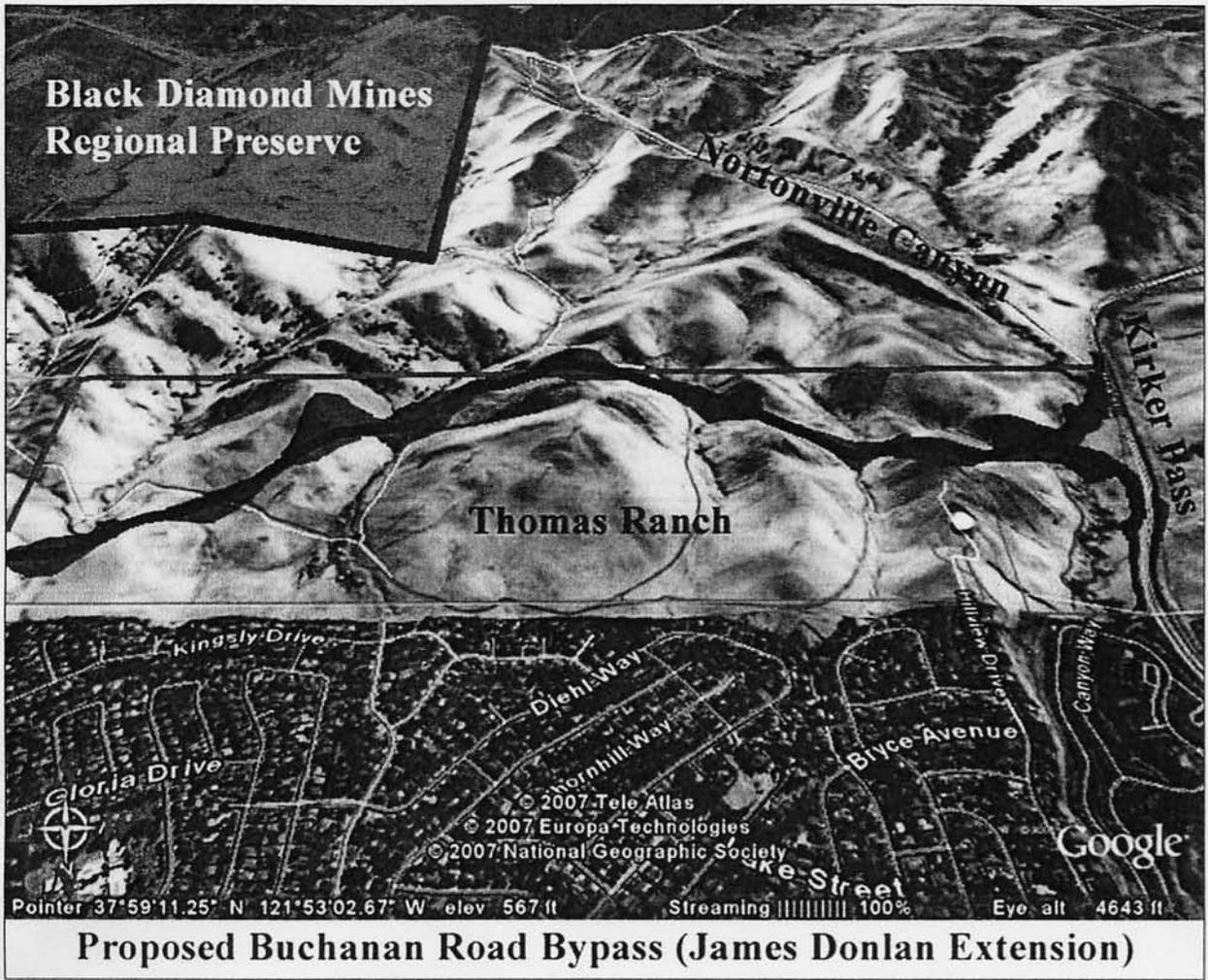
9. Construction of the project could create a barrier for wildlife traveling along an open space corridor stretching from Concord to Livermore, and on smaller corridors along drainages. The project would destroy the habitats of special-status species.
 - a. What design standards would be used to preserve wildlife corridors? For example, the Contra Costa Water District incorporated wildlife protection features in its relocated Vasco Road but its mitigations were ineffective; the wildlife road crossings there appear to have been a failure.

10. The project is subject to Regional Water Quality Control Board regulation and appears to be located in both the San Francisco Bay region and the Central Valley region.
 - a. What are the regulatory considerations?

11. The project could create further slope instability in the hills. The project is on unincorporated land controlled by Contra Costa County. We believe the city has understated the acreage which will be affected, given that the project would cross seven drainages in highly erodable and landslide prone hills.
 - a. How was the acreage figure calculated in the absence of geotechnical & soils analysis?

12. The city suggest that 2.7 million cubic yards of soil would be graded to complete this project.
 - a. How was the grading figure calculated?

13. We're curious why the city has renamed a project which has long been known as the "Buchanan Bypass."



Description

The James Donlon Boulevard Extension Project (Buchanan Bypass) Area is located in unincorporated Contra Costa County south of the City of Pittsburg and west of the City of Antioch. The project consists of a 1.98-mile extension of James Donlon Boulevard west to Kirker Pass Road through undeveloped, privately owned, agricultural land.

Large tracts of open space used for agricultural and recreational purposes are adjacent to the project area and stretch to the south and the west.

The area is high in biological resources and contains a variety of habitats suitable for a number of different special status species.

According to the City, the project requires approximately 100 acres of right-of-way easements to be acquired by the City of Pittsburg from private property owners through eminent domain.

The James Donlon Boulevard Extension project (Buchanan Bypass) is located in an important and environmentally sensitive stretch of land. If approved, the project would have significant impacts on

1. visual resources
2. agricultural resources

3. a major wildlife corridor and a variety of minor corridors but with cumulatively significant impacts
4. listed endangered species and their habitats
5. cultural resources
6. unstable slopes
7. creeks, hydrology, water quality
8. land use designations
9. noise
10. public services.

Issues to Consider

Aesthetics

Despite dense development to the north, the James Donlon Boulevard Extension Project (Buchanan Bypass) Area would be located within a large area of undeveloped ranch land.

To the west, and south of the project site are expansive stretches of open space offering a beautiful landscape of rolling hills and sweeping canyons that serve as the backdrop for east Contra Costa County.

The project site's landscape includes dramatic slopes and drainages that enhance the aesthetic resources of Pittsburg and neighboring communities. As is stated in the Initial Study, Kirker Pass has been designated as a Contra Costa County scenic route and Highway 4 has been proposed as a State designated scenic route. The project site is visible from two scenic routes and development would impact views from these commuter corridors.

The project area is less than half a mile from Black Diamond Mines Regional Preserve and is visible from a number of trails within the Preserve. The amount of grading required for this project and the construction of a major road in the middle of open space is bound to have significant impacts on the aesthetic values of the area and look out points from Black Diamond Mines.

The project site is visible from two scenic routes, public recreational trails, and various other points throughout eastern Contra Costa County. Road construction has the potential to degrade aesthetic resources for people living in and traveling through the area. The EIR should include analysis about the effects on aesthetics and mitigations for impacts on these visual resources.

Agricultural Resources

As stated in the Initial Study comments, the parcels through which the proposed extension would be built are Williamson Act parcels and used primarily for cattle grazing. The proposed extension would divide a century old cattle ranch impacting cattle movement throughout the ranch. In addition, many of the surrounding properties are Williamson Act parcels used primarily for grazing cattle as well.

How would this project undermine agricultural uses in the area? How would this project affect the long-term agricultural viability of the many Williamson Act preserves in the area? Potential impacts on the agricultural uses of the lands surrounding the project should be considered in the EIR.

Air Quality

Residents, commuters, at risk populations, plant and some animal species are affected by adverse changes in the air quality. The EIR should consider how construction of the project and addition of another major commuter artery would impact air quality in the region.

How would this project contribute to air pollution?

How would it contribute to production of greenhouse gases and global warming?

Biological Resources

Wildlife Corridor

The project area is part of an open space wildlife corridor stretching south from Suisun Bay and North Concord to Livermore and the rest of the Diablo Range. Unfortunately, as Central and Eastern Contra Costa County continue to develop, open spaces and wildlife corridors are becoming increasingly fragmented and cut off from one another. Each development approval in this region creates greater fragmentation and narrows a major wildlife corridor. Approval of this project would continue the encroachment of development into an open space corridor and have negative impacts on wildlife dispersal.

Habitat and Special-Status Species

The project area is dominated by sloping grasslands with a few scattered oaks and is crossed by multiple creeks. The property appears to be high in biodiversity given onsite habitats. The creeks crossing the property provide riparian and wetland habitat and wildlife corridors for a variety of species, including the California red-legged frog.

The scattered oaks offer nesting sites and the open spaces provide perfect hunting habitat for many raptors including the golden eagle, which prey mostly upon small rodents common in grasslands. The open grassland provides suitable habitat for a number of different species, including California tiger salamander. Potential significant impacts to onsite habitats should be evaluated.

As stated in the Initial Study, the project area offers suitable habitat for a number of special status species, including California red-legged frog, California tiger salamander, Alameda whipsnake, white-tailed kite, golden eagle, Western burrowing owl, loggerhead shrike, California horned lark, and San Joaquin kit fox. The EIR should include an environmental study to determine what other special-status species may be present in the project area.

Special-status species and their habitats will be significantly impacted by the project. Riparian and wetlands habitats especially will be impacted due to tree removal, erosion caused by grading and soil instability, and increased runoff and point source pollution from the road. Fragmentation of wildlife corridors due to the road will create more barriers for animals traveling throughout the area. The EIR should evaluate how the project will impact special-status species due to loss of habitat.

Cultural Resources

Numerous Native American historical sites have been recorded in Mt. Diablo State Park and throughout the surrounding foothills and flatlands. A variety of tribes lived and gathered food in and around the area and their history is a significant part of the region's heritage. According to the Initial Study, one known pre-historic site has been recorded in the project area. The EIR should include a study of the entire area to determine whether more Native American sites may be present.

The Thomas Ranch is another important historical and cultural resource located in the project area. The Ranch represents the history of Eastern Contra Costa County dominated by cattle ranching. Preservation of the Ranch helps to maintain the heritage of the region as development replaces many of the area's historical resources. The Initial Study acknowledges that the Thomas Ranch is eligible for the National Register of Historic Places. The EIR should evaluate how the road extension project would impact the Thomas Ranch and other important historic resources in the area.

Geology and Soils

Activities that expose and disturb soil, such as construction and development, could impact soil resources and increase soil erosion, soil compaction, loss of soil productivity, etc. Implementing appropriate erosion control measures will help maintain soil resources, water quality, protect property from erosion damage, and prevent accelerated soil loss.

The topography of the area presents concerns about the grading and road construction required by the project. Hilly terrain covers the parcel with slopes rising and dropping from drainages throughout the project area. The area is known to be unstable and has suffered from landslides in the past.

How will grading and road construction impact slumps and slides in an area that is already prone to such occurrences? The EIR should include an analysis of the project's impact on surrounding soils and whether measures to limit negative impacts are in place.

Hydrology and Water Quality

The project area includes several intermittent streams and drainages with wetlands characteristics. Impacts on these drainages and creeks will impact any species that use these creeks and drainages as corridors or habitat.

Grading and road construction have the potential to impact the water quality of the streams throughout the property. Intense grading can cause a significant increase in soil erosion in the area. Potential erosion of soil near wetlands would have impacts on wetlands habitats. The construction of a new road will create an impermeable surface in the area. This change has the potential to increase runoff and impact drainage into the creeks.

Wetlands delineation and impacts on riparian habitat from the project should be assessed in the EIR

Land Use Planning; Cumulative & Growth Inducing Impacts

The EIR should consider the land uses throughout the area in analyzing how this project will add to cumulative impacts on agricultural and open space resources, and how it might be growth inducing.

The parcels through which the proposed extension would be built, and each of the parcels adjacent to the south of the project area, are Williamson Act preserve agricultural lands. Constructing a major road through these agricultural lands conflicts with the land use plan as designated by the County.

The James Donlon Extension project (Buchanan Bypass) has the potential to have significant growth inducing impacts. Construction of a major road through this area increases the likelihood

that the open space would be subdivided and developed. The extension would provide an access road for any potential development of the open land that it dissects. The EIR needs to consider the potential growth inducing impacts of constructing a major transportation corridor through open land.

Noise

Construction of the James Donlon Boulevard Extension (Buchanan Bypass) and future traffic along the road would increase the amount of noise in the area. The increased noise levels would impact neighborhoods to the north of the project area. The habitats and daily habits of animal species can be severely affected by increased ambient noise levels. The EIR should consider the impacts an increase in noise would have on neighboring communities and wildlife in the area.

Public Services

The James Donlon Boulevard Extension (Buchanan Bypass) would connect with Kirker Pass Road near the intersection of Kirker Pass Road and Nortonville Road. East Bay Regional Parks District (EBRPD) uses Nortonville Road for emergency vehicle access into Black Diamond Mines Regional Preserve. Increased traffic at this access point could interfere with EBRPD emergency services within the Preserve. The EIR should consider what impacts the James Donlon Extension would have on public services for Black Diamond Mines, as well as on the park itself.

Thank you for the opportunity to make comments on this project. SMD requests to receive notice of any further filings and SMD will provide further comments and questions at that time.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Bristol', with a stylized flourish at the end.

Troy Bristol
Land Conservation Associate