

Section X

ENVIRONMENTAL ANALYSIS

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ENVIRONMENTAL ANALYSIS SUMMARY

Introduction

This section of the Clayton 2000 General Plan provides an analysis of the potential significant effects that may occur as a result of the plan implementation. Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15166, the Environmental Impact Report (EIR) has been included within the Comprehensive Plan. No separate EIR is required. The purpose of this section is to outline how the Comprehensive Plan addresses the required issues for EIR's as defined in Article 9 of the CEQA Guidelines.

Description of the Project

The project is the completed draft of an update to the City of Clayton General Plan. The description of the City and the planning issues are included in Section I. Environmental issues are discussed on a section-by-section basis. There is no project requiring an EIR currently before the City.

Description of Environmental Setting

Each element in the City General Plan contains a review of the existing conditions. More specific information is available in the respective elements and reference documents in the areas of land use, circulation, housing, geological conditions, and biological resources.

Environmental Impact

The provisions of the CEQA Guidelines required by Section 15126 are included as part of the following section titled Environmental Analysis and Mitigation.

Degree of Specificity

Section 15146 (b) of the CEQA Guidelines states the following:

“An EIR on projects such as the adoption or amendment of a comprehensive zoning ordinance or a local General Plan should focus on the secondary effects that can be expected to follow from the adoption, but the EIR need not be as detailed as an EIR on specific construction projects that might follow.”

The analysis discusses the secondary effect of the plan implementation and does not attempt to discuss project-level impacts or mitigation.

POTENTIAL FOR CLAYTON DEVELOPMENT

Growth and development in the City of Clayton can occur in the following three ways:

1. Development of existing vacant and under-utilized parcels.
2. Annexation of area developed in the County.
3. Annexation of vacant land to be developed in the City of Clayton.

Development of Vacant and Under-Utilized City Parcels

The General Plan revision process included a review of every parcel in Clayton and outside the City limits but within the Sphere of Influence. Within Clayton a total of 81 private parcels, totaling 149.66 acres in addition to City open space totaling 60.83 acres, were considered for development feasibility or increase in density. Exhibit X-I provides parcel location reference, Assessor's parcel number, size, General Plan designation, zoning designation, present use, General Plan Committee recommendation, Housing Element Committee recommendation, Planning Commission recommendation and Council adoption. A summary analysis of the effect of the change is provided below:

1. **Changes from Office and PUD to Commercial.** There were 5 parcels affected, totaling 11.87 acres. The change was in anticipation of the expiration of the Bernstein agreement provision on commercial development. Residential development to augment commercial was included as an option. Fulfillment of maximum expectation would result in 100 units of apartments.
2. **Change from Office to Town Center Commercial.** There are 10 parcels designated Town Center Commercial previously designated for office use. The change permits commercial-office development flexibility within Clayton. The Town Center area designation also permits second story residential for an area of 5.01 acres within Clayton. The maximum number of units expected would be 25.
3. **Change to Institutional designation on church sites.** There are two church sites with considerable area. The Institutional designation will affect 8.04 acres and can yield a total of 160 units.
4. **Change from 1-3 du/acre to 1.0 to 3.5 du/ac.** There are 14 parcels totaling 32.71 acres that were designated with one of the 5 previous General Plan designations ranging from one to 3 units. These designations have been consolidated into one. In many cases the effect will result in no change over the previous situation due to parcel configuration, sewerage availability and other limitations. In some cases density can be increased slightly and 33 units could be added assuming an additional unit per acre of land due to the revised designation.

5. **Changes from under 3 du/acre to 3.1-5.0 du/acre.** There are 13 parcels in this category, totaling 33.51 acres. This change in designation generally suggests an increase of 2.5 units per acre which can generate a maximum increase of 84 units.
6. **Change from 1-3 du/acre to 7.6-10.0 du/acre.** This consists of 4 parcels adjacent to the Town Center. The area consists of 2.04 acres and the potential increase is 14 units.
7. **Change to 10-15 du/ac.** No sites have been identified under this designation at this time.
8. **Parcels with no change indicated.** Of the 81 parcels considered for change in density, a total of 15 parcels were excluded from increase. There were several reasons, including septic tank, sewerage, flooding potential, inconsistency with surrounding parcels, physical constraints of the site and other apparent limitations.
9. **Parcels reduced in density.** A single 3-acre parcel belonging to the City was redesignated to Open Space.
10. **Parcels designated as “Study”.** A single parcel, DeMartini Winery totaling 8.32 acres was designated as Study, pending resolution of a dispute among heirs.
11. **No public sites were identified as surplus.** City property considered consisted of 61 acres of Open Space.

The maximum number of units that could be constructed within the City Limits were 253 units of single family, cluster and multiple types in addition to 160 units of senior housing for a total of 413 units.

Annexation of Areas Developed in the County

Exhibit X-2 identifies those areas that have been subdivided and developed within Contra Costa County and would be able to annex to the City of Clayton. This includes Dana Hills, Diablo Downs, and potentially Regency Meadows. Environmental issues have been resolved for these projects upon their development. Annexation into the City of Clayton would provide an improved social circumstance due to a more efficient system of service delivery and strengthened community linkages.

Annexation of Vacant Land to be Developed in the City of Clayton

The primary area envisioned for development is the Keller Ranch. The Keller Ranch has been the subject of several EIR's. In each case the area development has varied slightly, as has the number of units.

The adopted General Plan designated land use within Keller Ranch by establishing 12 areas of residential development at varying densities. Open space area totals 774.3 acres. Commercial Town Center area totals 19.3 acres and a community facility area totals 9 acres. Exhibit X-1 lists the exact acreages for all areas. Additional discussion of aspects of Keller Ranch can be found in each of the Elements and Appendices.

There is additional land with Clayton's Sphere of Influence that needs to be identified. It is estimated that south of Keller Ranch there are 100 acres of land in parcels predominately 5 acres or less in size that are on well and septic tanks. These parcels were divided in the County, often with restrictions on further division. Additional estate development under present designation can be estimated at 10 units. There are 3 larger parcels which have attracted attention. The Four Winds parcel has been the subject of an EIR and lengthy hearings. The proposal was the development of a 32-unit retirement community on 11 acres. The second parcel is an odd shaped site at Marsh Creek Road extension belonging to W. H. Easley. An increase from one unit per acre to over 5 units per acre has been approved in this General Plan revision. The net increase yield will provide 58 units of cluster development. The last piece belongs to Seeno Construction and is adjacent to the Keller Ranch. This parcel was increased from 32 units approved previously to a maximum of 100 units providing an increase of 68 units.

The maximum number of units generated by these General Plan revisions is 669, consisting of the revision to Keller, Seeno Marsh Creek and Easley Marsh Creek properties. There is an additional parcel on the west side of Clayton known as the Murchio Estate. This parcel is the site of the Lone Star Quarry and no residential or commercial development is anticipated there.

This document does not provide sufficient environmental detail to enable major development without further analysis. This General Plan does not intend to identify all the mitigation measures necessary prior to project approval. The purpose of the General Plan has been to consolidate information regarding Keller Ranch, to clarify the issues of Keller Ranch and to discuss the potential of this development in relationship to the existing community. Since the Keller Ranch project has been in consideration for over 10 years and has been the subject of four EIR's, it should come as no surprise that one day it will be developed. Whether the development will occur in Contra Costa County or in Clayton is unknown at this time. The project is in the Clayton Sphere of Influence and based on this, it should develop in Clayton. Prior to development an EIR will be required that will address localized impacts, cumulative impacts and impacts on adjacent jurisdictions. Since there is no active proposal at this time, it is not possible to foresee potential constraints and opportunities provided by the future application. Therefore, discussion of Keller Ranch can only include references to previous concerns under varying development concepts.

It is assumed that this General Plan revision and EIR will provide an adequate base of information for future analysis of development.

Relationship of Development to the EIR

The parameters of the EIR are directed to the potential for new development as discussed in the previous section. The specific land use changes and their maximum yield brought about by the adoption of the General Plan have been enumerated. Each Element identifies existing circumstances, possible effects and mitigation measures.

The purpose of the General Plan is to bring elements into compliance with existing laws, to include known information and to review vacant land potential within the City and its Sphere of Influence. Plan effects within Clayton will result from implementation of a clear document rather than establishment of new development directions.

EXHIBIT X-1 - TABLE OF PARCELS
City of Clayton General Plan - "Clayton 2000" Parcel Inventory

Area No.	Assessor's Parcel No.	Size	1979 General Plan Designation	Existing Zoning	Present Use	Recommendation by General Plan Review Comm.	Recommendation by Housing Element Comm.	Recommendation by Planning Comm.	Designation Adopted by City Council
I a	118-031-007	1.23Ac	PAO	PAO	Residential	Commercial	MFM(10.1-15)/ Commercial	Commercial	Commercial
b	118-031-035	2.04Ac	PUD	PUD/Comm	Residential	Commercial	MFM(10.1-15)/ Commercial	Commercial	Commercial I
c	118-031-027	4.27Ac	PAO	PAO	Residential	Commercial	MFM(10.1-15)/ Commercial	Commercial	Commercial
d	118-032-018	1.76Ac	PAO	PAO	Residential	Commercial	MFM(10.1-15)/ Commercial	Commercial	Commercial
e	118-031-033	1.052Ac	PAO	PAO	Residential	Commercial	MFM(10.1-15)/ Commercial	Commercial	Commercial
f	118-031-034	1.52Ac	PAO	PAO	Residential	Commercial	MFM(10.1-15)/ Commercial	Commercial	Commercial
g	118-031-031	2.37Ac	None	PUD	Church/ Day Care	Institutional Assume 20 Du/Ac	Institutional Assume 20 Du/Ac	Institutional Assume 20 Du/Ac	Institutional Assume 20 Du/Ac
II	118-101-022	2.767Ac	SF/High	Agricultural	Church	No change	No change	No change	Dedicated Open Space
III a	118-310-028	3.0Ac	SF/High	R-12	Open Space	No change	Med. Den (3.1-5)	Study	Dedicated Open Space
c	118-020-028	14.0Ac+	PUD/Med	PUD	Residential Horse Use	No change	Med. Den (3.1-5)	Med. Den (3.1-5)	No change
d	118-230-002	2.83Ac	PUD/Low	PUD	Open Space	No change	Med. Den (3.1-5)	No change	Dedicated Open Space
e	118-230-001	2.177Ac	PUD/Low	PUD	No change	No change	Med Den (3.1-5)	Low Den (1.1-3)	Low Den (1.1-3)

Area No.	Assessor's Parcel No.	Size	1979 General Plan Designation	Existing Zoning	Present Use	Recommendation by General Plan Review Comm.	Recommendation by Housing Element Comm.	Recommendation by Planning Comm.	Designation Adopted by City Council
IV a	120-043-004	2.41Ac	SF/Med	R-15	Residential	Low Den (1.1-3)	Low Den (1.1-3)	Low Den (1.1-3)	Low Den (1.1-3)
b	120-043-005	2.50Ac	SF/Med	R-15	Residential	Low Den (1.1-3)	Low Den (1.1-3)	Low Den (1.1-3)	Low Den (1.1-3)
c	120-043-019	1.00Ac	SF/Med	R-15	Residential	Low Den (1.1-3)	Low Den (1.1-3)	Low Den (1.1-3)	Low Den (1.1-3)
V	121-090-011 121-090-016	8.65Ac	SF/Med	R-15	Vacant	Med Den (3.1-5)	Low Den (1.1-3)	Med Den (3.1-5)	Med Den (3.1-5)
VI a	120-015-001	.30Ac	SF/Med	R-15	Residential	No change	Special Study Area	Future Study Area	Low Den (1.1-3)
b	120-015-002	.40Ac	SF/Med	R-15	Residential	No change	Special Study Area	Future Study Area	Low Den (1.1-3)
c	120-015-003	1.27Ac	SF/Med	R-15	Residential	No change	Special Study Area	Future Study Area	Low Den (1.1-3)
d	120-015-007	.29Ac	SF/Med	R-15	Residential	No change	Special Study Area	Future Study Area	Low Den (1.1-3)
e	120-015-008	.32Ac	SF/Med	R-15	Residential	No change	Special Study Area	Future Study Area	Low Den (1.1-3)
f	120-015-009	1.079Ac	SF/Med	R-15	Fire Station	No change	Special Study Area	Future Study Area	Low Den (1.1-3)
VII a	118-062-008	.55Ac	PUD/Low	R-15	Residential	No change	No change	No change	Low Den (1.1-3)
b	118-062-007	.53Ac	PUD/Low	R-15	Residential	No change	No change	No change	Low Den (1.1-3)
c	118-010-007	8.32Ac	PUD/Low	Agricultural	Historic Winery	High Den (5.1-7.5) eastern part	Low Den (1.1-3) on part	Agricultural/ Study Area	Agricultural/ Study Area
VIIIa	118-010-009	2.64Ac	Commercial	L-C	Vacant	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix
b	119-012-003	1.05Ac	Commercial	L-C	Vacant	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix

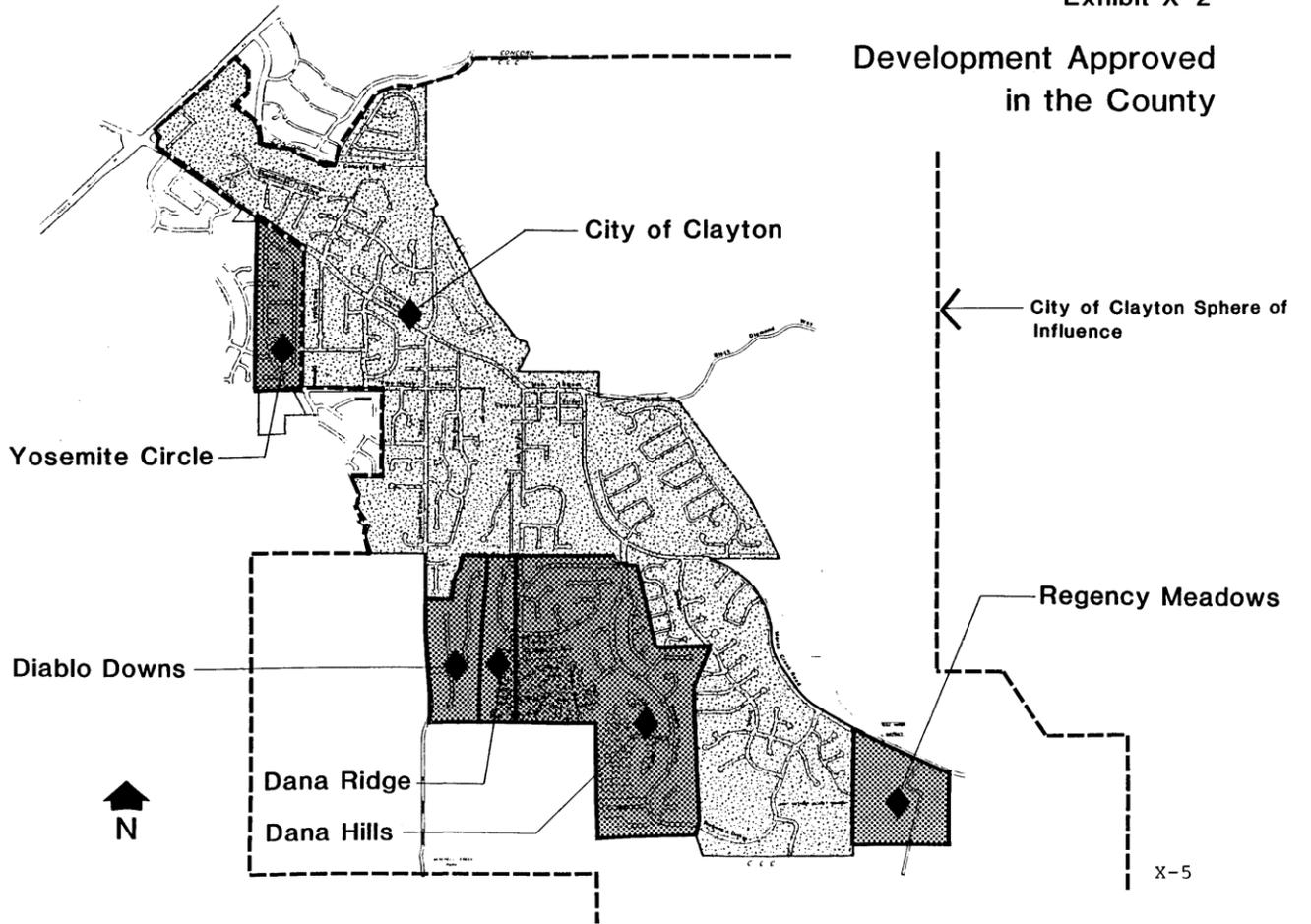
Area No.	Assessor's Parcel No.	Size	1979 General Plan Designation	Existing Zoning	Present Use	Recommendation by General Plan Review Comm.	Recommendation by Housing Element Comm.	Recommendation by Planning Comm.	Designation Adopted by City Council
c	119-012-004	1.45Ac	Commercial	L-C	Vacant	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix
d	119-571-001	2.09Ac	SF/High	R-15	Vacant	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix
e	119-015-001 119-015-002	1.20Ac+	Commercial	L-C	Vacant	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix
IXa	119-016-001	5M Ac	PAO	PAO	Community Hall	Town Center Commercial	No change	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix
b	119-016-003	10M Ac	PAO	PAO	Vacant	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix
c	119-016-002	5M Ac	PAO	PAO	Vacant	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix
d	119-016-004	.230Ac	PAO	PAO	Residential	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix
e	119-016-005	.34Ac	PAO	PAO	Vacant	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix
f	119-017-001	30M SqFt	PAO	PAO	Residential	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix
g	119-017-002	10M SqFt	PAO	PAO	Vacant	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix
h	119-018-001	1.060Ac	PAO	PAO	Vacant	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix
i	119-018-002	.36Ac	PAO	PAO	Residential	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix
j	119-018-003	20M SqFt	PAO	PAO	Vacant	Town Center Commercial	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix	TC Comm/High Den(5.1-7.5) mix

Area No.	Assessor's Parcel No.	Size	1979 General Plan Designation	Existing Zoning	Present Use	Recommendation by General Plan Review Comm.	Recommendation by Housing Element Comm.	Recommendation by Planning Comm.	Designation Adopted by City Council
Xa	119-021-085	.95Ac	R-40-H	R-40-H	Vacant	No change	MFM (10.1-15)	MFL (7.6-10)	MFL (7.6-10)
b	119-021-001	.35Ac	SF/Med	R-15	Residential	No change	MFM (10.1-15)	MFL (7.6-10)	MFL (7.6-10)
c	119-021-028	.40Ac	SF/Med	R-15	Residential	No change	MFM (10.1-15)	MFL (7.6-10)	MFL (7.6-10)
d	119-021-041	.34Ac	SF/Med	R-15	Residential	No change	MFM (10.1-15)	MFL (7.6-10)	MFL (7.6-10)
XIa	119-021-054	1.13Ac	SF/Low	R-40-H	Residential	Med Den (3.1-5)	Special Study	Med Den (3.1-5)	Med Den (3.1-5)
b	119-021-055	.97Ac	SF/Low	R-40-H	Residential	Med Den (3.1-5)	Special Study	Med Den (3.1-5)	Med Den (3.1-5)
c	119-021-013	.93Ac	SF/Low	R-40-H	Residential	Med Den (3.1-5)	Special Study	Med Den (3.1-5)	Med Den (3.1-5)
d	119-021-063	1.00Ac	SF/Low	R-40-H	Residential	Med Den (3.1-5)	Special Study	Med Den (3.1-5)	Med Den (3.1-5)
e	119-021-019 119-021-020	.60Ac .94Ac	SF/Low	R-40-H	Residential	Med Den (3.1-5)	No change	Med Den (3.1-5)	Med Den (3.1-5)
f	119-400-001	1.51Ac	SF/Low	R-40	Residential	Med Den (3.1-5)	No change	Med Den (3.1-5)	Med Den (3.1-5)
g	119-400-002	1.02Ac	SF/Low	R-40	Residential	Med Den (3.1-5)	High Density (5.1-7.5)	Med Den (3.1-5)	Med Den (3.1-5)
h	119-400-006	.917Ac	SF/Low	R-40	Residential	Med Den (3.1-5)	High Density (5.1-7.5)	Med Den (3.1-5)	Med Den (3.1-5)
i	119-400-004	1.844Ac	None	PUD	Vacant	Med Den (3.1-5)	High Density (5.1-7.5)	Med Den (3.1-5)	Med Den (3.1-5)
j	119-400-005	.918Ac	None	PUD	Day Care	PUD/ Day Care Center	PUD/ Day Care Center	PUD/ Day Care Center	PUD/ Day Care Center
k	119-400-003	1.013Ac	None	L-C	Commercial Nursery	No change	No change	No change	No change
XII	119-080-017	10Ac+	PUD/High	PUD	Horse Center Agricultural	No change	High Density (5.1-7.5)	High Density (5.1-7.5)	High Density (5.1-7.5)

Area No.	Assessor's Parcel No.	Size	1979 General Plan Designation	Existing Zoning	Present Use	Recommendation by General Plan Review Comm.	Recommendation by Housing Element Comm.	Recommendation by Planning Comm.	Designation Adopted by City Council
XIII	122-060-011	24.24Ac	PUD	PUD/School	Religious Training	No change	Special Study	No change	PUD/School
XIV	119-040-019	13.52Ac	SF/High	Agriculture	Residential Light Ind.	Low Den (4.1-3)	No change	Low Den (4.1-3)	Low Den (4.1-3)
XV1	SOI	57.45Ac	SOI	SOI	Vacant	Med Den (3.1-5)	Med Den (3.1-5)	Med Den (3.1-5)	Med Den (3.1-5)
2	SOI	60.55Ac	SOI	SOI	Vacant	Low Den (1.1-3)	Low Den (1.1-3)	Low Den (1.1-3)	Low Den (1.1-3)
3	SOI	13.96Ac	SOI	SOI	Vacant	Med Den (3.1-5)	Med Den (3.1-5)	Med Den (3.1-5)	Med Den (3.1-5)
4	SOI	29.07Ac	SOI	SOI	Vacant	Low Den (1.1-3)	Low Den (1.1-3)	Low Den (1.1-3)	Low Den (1.1-3)
5	SOI	65.03Ac	SOI	SOI	Vacant	Rural Est (.2-1)	Rural Est (.2-1)	Rural Est (.2-1)	Rural Est (.2-1)
6	SOI	32.46Ac	SOI	SOI	Vacant	Low Den (1.1-3)	Med Den (3.1-5)	Med Den (3.1-5)	Low Den (1.1-3)
7	SOI	58.50Ac	SOI	SOI	Vacant	Med Den (3.1-5)	Med Den (3.1-5)	Med Den (3.1-5)	Med Den (3.1-5)
8	SOI	24.84Ac	SOI	SOI	Vacant	Low Den (1.1-3)	Low Den (1.1-3)	Low Den (1.1-3)	Low Den (1.1-3)
9	SOI	7.3Ac	SOI	SOI	Vacant	MFL (7.6-10)	MFL (7.6-10)	MFM (10.1-15)	MFL (7.6-10)
10	SOI	15.62Ac	SOI	SOI	Vacant	High Den (5.1-7.5)	MFM (10.1-15)	MFL (7.6-10)	High Den (5.1-7.5)
11	SOI	10.8Ac	SOI	SOI	Vacant	Low Den (1.1-3)	Med Den (3.1-5)	Low Den (1.1-3)	Low Den (1.1-3)
12	SOI	45.49Ac	SOI	SOI	Vacant	S1 Con (0-.1)	S1 Con (0-.1)	S1 Con (0-.1)	S1 Con (0-.1)
13	SOI	74.30Ac	SOI	SOI	Vacant	S1 Con (0-.1)	Open Space	Open Space	Open Space
13a	SOI	Part of above	SOI	SOI	Vacant	None	None	Study Ara	No Study Area
CF	SOI	10.5Ac	SOI	SOI	Vacant	8.90 AC Community Facility	None	10.5 AC Community Facility	8.90 AC Community Facility

Area No.	Assessor's Parcel No.	Size	1979 General Plan Designation	Existing Zoning	Present Use	Recommendation by General Plan Review Comm.	Recommendation by Housing Element Comm.	Recommendation by Planning Comm.	Designation Adopted by City Council
XCIa	Southeast Portion SOI	100Ac+	SOI	SOI	Rural Res	None	None	Study Area	Study Area
b	78-020-004	11.58Ac	SOI	SOI	Vacant	None	Med Den (3.1-5)	Study Area	Study Area
XVII	SOI	8.5Ac	SOI	SOI	Residential	None	None	High Den (5.1-7.5) Max 50	High Den (5.1-7.5) Max 50
XVIII	119-070-003 SOI	20.63Ac	SOI	SOI	Vacant	None	None	Med Den (3.1-5)	Med Den (3.1-5)

Development Approved
in the County



ENVIRONMENTAL ANALYSIS AND MITIGATION

PHYSICAL FEATURES

Topography

a. **Potential Impacts**

The Land Use and Housing Elements illustrate the distribution of the future land use. The construction of housing, roadways and other forms of development could adversely affect significant topographic features. Policies are identified for the different intensities of land use and steepness of slope to limit topographical alteration.

b. **Mitigation Measures**

Potential adverse impacts to topography in the City are mitigated by the policies of the General Plan. The distribution of land uses on the Land Use Map is based upon a scenario that restricts uses to percent slope. Urban residential uses (greater than 2 du/ac) are restricted to a 0-15 percent slope. Rural residential land uses (1 acre minimum lots or greater) are generally permitted on a slope between 15-25 percent. Slopes greater than 26 percent are protected from intensive development

The Open Space/Conservation Element includes policies to protect significant hillsides and ridgeline from development. The Open Space Element designates the areas of significant hillsides and ridgeline as Reserve Management / Conservation Areas and includes policies to protect their integrity.

Geology

a. **Potential Impacts**

The Safety Element and Appendix E discuss the geologic constraints affecting the City. Although several potential types of hazards exist, landslides have the greatest potential to do extensive damage. USGS and EIR maps delineate areas where potential impacts may occur without adequate mitigation.

b. **Mitigation Measures**

The policies of the Safety Element mitigate geologic hazards through restrictions. It is the policy that if a potential hazard exists, a detailed geotechnical investigation must be undertaken by a qualified engineer. In addition, known or suspected landslides must be corrected or avoided. Protected areas shall be designated as a Resource Management / Conservation Areas. Known studies are identified in the Safety Element and Appendix E.

Seismicity

a. The Safety Element discusses the potential impacts of a seismic event.

b. **Mitigation Measures**

Geotechnical studies are used to identify mitigation measures, which include

setbacks and UBC Zone 4 construction measures.

Soils

a. Potential Impacts

Future development in the City will have a potential impact on soils in the City. The Keller Ranch is suitable rangeland. Its development will eliminate land that is used for livestock grazing but is not suitable for intensive cultivation.

b. Mitigation Measures

The density of the Keller Ranch is less than 1.5 units per acre. By clustering development, hundreds of acres will remain as range. Clayton has nearly its entire southerly city boundary designated as State park and its eastern boundary beyond Keller in the County Williamson Act Program. The western boundary includes a quarry and the City of Concord; and at Clayton's northern boundary lies the City of Concord. Clayton does not intend to develop additional areas to the east, although the City would like to exert influence on the County in the event that development is proposed. Park and agricultural preserve areas are identified in the Open Space/Conservation Element.

Groundwater Resources

a. Potential Impacts

Areas of the City of Clayton have wells and septic tanks. The City began as a large lot rural community where expansion and infill occurred. Consequently, initial homes had wells and septic tanks. Following incorporation, additional homes on acre-plus lots were developed with septic tanks. In the late 70's newer subdivisions on smaller lots were built with full services. Eventually all septic tanks will be eliminated.

Aquifer recharge areas are most likely to be found along the many creeks. The City of Clayton protects these likely aquifer recharge areas through protection of its greenbelt system, which establishes open space corridors along streams. These corridors protect water flow and recharges. Springs have been identified in the Clayton area. These will be protected for their benefits as well as potential for undermining pavement and foundations. There is no proposal that would increase draw down or contaminate water resources or eliminate areas with high recharge potential.

b. Mitigation Measures

The City will continue to protect streams within its flood plain as greenbelts, it will require investigation of spring locations in the Keller Ranch area, and it will support expansion of municipal services to unsewered areas.

Surface Waters and Flooding

a. Potential Impacts

Flood channels are an important resource in Clayton. They provide open space and a trail system. They comprise a significant element of the City's character.

Mitigation measures are necessary which address the need to retain the creek resources and also lessen the risk of damage caused by flooding.

b. **Mitigation Measures**

The Open Space Element designates the natural creeks and channels as a significant open space resource to be conserved and protected. The Safety Element policies stress the need to retain the natural creeks and channels as the primary flood control and drainage system.

The creeks do not offer sufficient capacity at present to provide adequate flow in event of a 100-year storm. The extent of the problem is discussed in the Safety Element. The difficulty of providing adequate flood protection is not the common problem of encroachment of development into the floodplain but the extent of alteration and destruction of current greenway amenities necessary to provide adequate flood protection. Clayton has not suffered flood devastation in recent history but without adequate preventative measures, flood damage can be expected. Prevention of new development will not prevent the existing problem.

Biological Resources

A series of EIR's noted in the bibliography have identified biological resources in the City of Clayton.

a. **Potential Impacts**

Removal of habitat as a result of development, although no specific endangered species have been identified.

b. **Mitigation Measures**

The City shall promote open space protection measures such as residential clustering, park dedication, Williamson Act contract protection of significant vegetation in project design and expansion of the greenbelt system.

Air Quality

a. **Potential Impacts**

The construction, population increase, and expansion of City area will contribute to deterioration of air quality. Emissions will be chiefly attributed to increased auto usage. Development in Clayton will tend to generate higher vehicle miles traveled than will high-rise apartments within walking distance from the newly emerging employment centers in Central County.

Since Clayton is at the end of the valley, periods of inversion will bring poor air quality.

Carbon monoxide hot spots are likely at Kirker Pass intersections with Clayton Road and Concord Boulevard. A detailed discussion of air quality is included in the Safety Element.

b. **Mitigation Measures**

Aside from project level mitigation measures related to construction activities, the most effective local implementation will be those measure that reduce single-vehicle occupant commuters, general dependence on the automobile and necessity of long trips to stores for goods and services. Land use allocation within Clayton will benefit air quality through more centrally located commercial facilities, high density concentrations of land use rather than dispersal of density, and measures to facilitate non-auto travel. Additional mitigation discussion can be found both in the Safety Element and in the Circulation Element.

Scenic Resources

a. Potential Impacts

Future growth could reduce the amount of open space and change the rural character of the community. The recognition of scenic resources and provisions for their long-term protection can be lost if adequate consideration is not given. Negative effects would include the elimination of open space, the blocking of views and vistas, and the reduction of vegetation and wildlife.

b. Mitigation Measures

The community Design and Open Space/Conservation Elements establish the importance of scenic resources in maintaining Clayton's rural character. Each element contains policies to protect and manage the scenic resources of the City.

Historic Resources

a. Potential Impacts

The community Design Element has identified historical buildings and sites within the City. Without adequate mitigation, some of these sites could be destroyed by new development or neglect. An archaeological site of major significance (Cco-222) is also found in the Town Center.

b. Mitigation Measures

The City of Clayton's General Plan expresses the need for the City's land use, circulation and community design policies to consider historic preservation. The final area of consideration includes provisions for archaeological site protection. Depending upon the location and parcel size, surveys performed by qualified archaeologists should be required on development projects to ascertain if a site exists. Pages 23-28 of the 1983 Keller Ranch EIR by LSA describe the value of this site and mitigation measures necessary to its protection.

Population/Social Characteristics

a. Potential Impacts

The original Wilbur Smith General Plan adopted in 1971 called for a City build-out of 9,554 units and 37,106 people. The previous General Plan identified a total of 2,455 units and 7,856 people including Keller Ranch but not the annexation of developed unincorporated areas. The adopted General Plan has a maximum build-out of 3,399 units generating 11,217 persons at 3.3 persons per unit. This includes the existing 1,540 city units but does not include either the

555 units developed outside city limits or the study area south of Keller. The ultimate build-out of the community will bring change but it will also bring resolution of the development controversy that has affected Clayton. The general level of development will not adversely affect Clayton. The issues rest with the type and character of development.

b. **Mitigation Measures**

Several elements of the General Plan address the potential impacts of growth. Specifically, sections regarding public services such as roadways, water, sewer and schools state that new development should not be approved beyond the ability of the City or other public agencies to provide a consistent level of service. Also, several elements of the Plan include policies to retain Clayton's rural character through open space preservation and community design guidelines.

DEVELOPMENT ISSUES

Land Use and Zoning

The General Plan is designed to clarify the land use policies and zoning regulations of the City. Therefore, property owners, residents, and business people will have a clearer understanding of future land uses and the methods of implementing land uses through zoning regulations.

The Land Use Element includes policy guidelines for ensuring that the basic pattern of land use will be retained. This will be accomplished through encouraging in-fill development and discouraging the conversion of open space not directly adjacent to the existing development areas. To implement the General Plan it will be necessary to establish new zones and prepare a consistency matrix.

Circulation and Transportation

a. **Potential Impacts**

The Circulation Element describes Clayton's setting, current road usage and the potential demand on the system. Road improvements are needed to accommodate growth and to bring the Clayton road system from a rural standard to a city standard.

b. **Mitigation Measures**

Road system improvement needs are described in the Circulation Element. The means for accommodating the increase in population will include new roads, street widening and intersection improvements but there are two other concerns that must also be incorporated into solutions. Region-wide traffic management must be considered and the respective roles and contributions of jurisdictions determined. Improvement of transit, car pool, van pool, and bicycle opportunities must be pursued and other transportation system management measures investigated.

Noise

a. Potential Impacts

Adverse noise conditions that exist in the City are principally traffic generated. Noise levels will be increased by future growth. Several residential areas and an elementary school are affected by adverse noise levels. Overflight noise from commercial or military aircraft does not affect the City. No railroad lines cross the City, and noise from industry is highly localized and not considered an adverse impact. Noise from gravel trucks hauling rock from an adjacent quarry provides the single greatest source of complaint. Passenger vehicle traffic noise along Clayton and Marsh Creek Roads is the second highest cause of complaint. Quarry blasting and earthmoving also draw complaints on occasion.

b. Mitigation Measures

The Noise Element includes information identifying the patterns of current and future excessive noise levels. The Noise Element establishes acceptable outdoor noise levels for single-family residential (60dBA CNEL), and an indoor level of 45 dBA CNEL. The recognition of the location of anticipated noise levels principally along arterial roadways in the design of future development will mitigate adverse noise levels. Policies in the plan address acceptable design methods of reducing noise such as setbacks, clustering, architecture, orientation, window placement and construction. The policies state that the use of a block wall should be used only when other techniques either fail to reduce adverse levels or significantly increase the cost of construction beyond a reasonable amount.

COMMUNITY SERVICES

Community Services and Facilities

a. Potential Impacts

Impacts on community services are generally related to growth. The Draft Keller Ranch EIR written in February 1983 was based on community impacts caused by 1,825 residential units and 190,000 square feet of commercial space and 60,000 square feet of office area. The general impact of buildout of the remainder of Clayton upon services will not be significantly increased beyond what will be experienced by the development of the Keller Ranch. Specific impact of development is discussed in the Keller EIR's. City-wide development does not alter the parameters of that discussion.

b. Mitigation Measures

Specific construction measures, mitigation fees and service expansion generally provide mitigation for service needs.

Parks and Recreation

a. Potential Impacts

Presently there are no standard neighborhood parks in the City of Clayton. The elementary school provides recreation facilities. City parklands fall within the greenbelt system. New development will create pressure on existing facilities. However, new fees are generated by subdivision development. The potential for recreation opportunities will be improved by new development. A conventional park is indicated on the Keller plan.

b. Mitigation Measures

The City will designate neighborhood park sites and will continue to collect fees for park land development. The City may also develop activity nodes within its greenbelt system. Prior to this an overall concept should be developed for the system.

Schools

a. Potential Impacts

The Clayton Planning Area is located within the Mt. Diablo Unified School District. In addition to Clayton, the District serves Concord, Pleasant Hill, portions of Martinez, West Pittsburg and Walnut Creek as well as additional unincorporated areas. Schools that serve children from Clayton are the Mt. Diablo Elementary School, Pine Hollow Intermediate School and Clayton Valley High School. Since the Clayton area is experiencing growth, these schools are subject to overcrowding.

The District as a whole is experiencing a decline in enrollment. Therefore, Clayton students from new developments may be shifted to fill other schools that are less crowded.

For Clayton residents, attendance at an elementary school in Clayton is an important unifying aspect. Community needs should be evaluated along with District needs.

b. Mitigation Measures

Collection of SB 201 funds and possible dedication of land are the most commonly used mitigation measures at this time; however, it will be important to monitor other alternatives.

Library Services

a. Potential Impacts

There is no library in Clayton. A bookmobile stops once a week to provide library services. New development may stimulate the need for expanded library facilities and services. It is likely that in the event a library was proposed in Clayton, the facility would receive substantial local support.

b. **Mitigation Measures**

Local fund drives and general fund allocations could mitigate the cost of establishment of a library in Clayton.

Law Enforcement

a. **Potential Impacts**

The City of Clayton has a police force of 8 persons including a chief. Expansion of the community will require enlargement of the force. Any expansion of the force will be coordinated with the phasing of development.

b. **Mitigation Measures**

The cost and benefit of new development shall be evaluated. One criteria shall balance the expansion of general revenues and the need for additional patrolmen.

Fire Protection

a. **Potential Impacts**

Clayton is within the Contra Costa County Consolidated Fire Protection District. There is an existing fire station at the intersection of Clayton and Mitchell Canyon Roads. In event that the Keller Ranch develops, the station is to be relocated near the area of Main Street and Concord Boulevard. The new station would serve all of Clayton, and presumably, the old station would be abandoned for some other use.

b. **Mitigation Measures**

The Fire District will obtain land or fees or both from Keller Ranch when development occurs. Since the initial phase of development could not pay for a station, some funding mechanism would be necessary. Fire District requirements and recommendations for new development include the following:

1. A water supply system for fire protection shall be installed and maintained with fire flows equal to or greater than those required by Fire District standards and guidelines. Determination of actual requirements will depend upon specific information regarding building size, construction type, spacing and occupancy. Hydrant spacing shall be in accordance with Fire District standards and guidelines. (The water supply reservoir capacity is estimated at 240,000 gallons, depending on maximum fire flow requirements.)
2. Every building must be accessible to fire apparatus by means of streets or roads meeting or exceeding Fire District standards and guidelines which relate to driving surface widths, curve, radii, grades, grade changes, load support and turnarounds.
3. Access gates and fire roads must be provided for fire apparatus to reach open space areas at locations specified by the Fire District. The City should provide perpetual easements for such access as may be required by the Fire District.

4. A plan to be approved by the Fire District for the perpetual control and abatement of hazardous weeds, grass and brush in all open space areas must be submitted. Such plans may include disked firebreaks, cattle grazing, and/or fire resistant planting.
5. The travel time and distance demands for responding fire companies cannot be completely resolved by station establishment or relocations. Accordingly, District fire flow delivery capabilities will be limited to less than standard. To compensate for these limitations, the following additional mitigation shall be required.
 - (a) All buildings requiring a minimum fire flow in excess of 1,000 gpm, or located in an area requiring a minimum fire flow in excess of 1,000 gpm, shall have a fire retardant roof covering as specified by the Fire District.
 - (b) All buildings requiring a minimum fire flow in excess of 1,500 gpm shall have automatic fire extinguishing systems specified and approved by the Fire District.
6. Plans showing compliance with the above mitigation measures shall be submitted to and approved by the Fire District prior to the commencement of any construction.
7. Fire danger shall be determinant in selection of roof material.

c. **Potential Impacts.**

The Contra Costa County Water District provides water to the Clayton area; however, District boundaries do not currently include the entire Keller Ranch. At the present time, water service is available in Pressure Zone 4 (elevations below 420 feet), Zone 6 (600 to 760 feet in elevation) and Zone 7(760 to 880 feet). Storage in Zone 5 (elevations between 420 to 600 feet) in the Clayton area has reached maximum capacity and reservoir facilities are being constructed. No service is presently available to elevations above 880 feet (Zone 8).

There are existing Zone 4 water mains along Main Street and Concord Boulevard. However, the water main line on Main Street is not of sufficient size to meet the Fire District's minimum flow requirements for certain commercial uses. In Pressure Zone 5, a 20 inch water main exists along Marsh Creek Road and a 16 inch main exists along Easley Drive between Marsh Creek Road and Center Street. Zones 6 and 7 water mains are presently located along Marsh Creek Road.

Build-out of Keller Ranch will require major improvements in existing water supply facilities. Existing water mains for various pressure zones would require extension. New pump stations and reservoirs would also have to be provided.

Water mains in Pressure Zone 4 could be extended to the site and a loop could be created by connecting Concord Boulevard and Main Street lines via Concord Boulevard extension and Marsh Creek Road (north). This extension would probably serve commercial and residential development located north of Center Street and west of Concord Boulevard. Since Zone 4 lines in Main Street do not have sufficient water flow to meet fire flow requirements for commercial uses, augmentation or modification of the Main Street line would be required. Additional storage in this zone would probably not be required.

In Zones 5, 6, and 7 additional storage would be required. Actual locations are presently unknown. Reservoirs for these zones could probably be located on the Keller Ranch. Maximum required elevations for adequate water pressure in Zone 7 would range between 960 and 990 feet. A hydro pneumatic water system would probably be used to serve residents in Zone 8; however, service in Zone 8 would be limited to a maximum elevation of approximately 955 feet. Lots located in Seclusion Valley are proposed above this elevation, and, depending upon whether a reservoir could be located at the required elevation, water service to these lots may pose significant limitations.

Existing water mains in Zones 5 and 6 would have adequate capacity to serve the Keller Ranch, and modification of these mains would not be anticipated. There would be two separate water systems in Zones 6 and 7. In these zones, the District would expect to connect the northern portion of the site to existing Zone 5 mains located at or north of Center Street while the southern portion of the site would be connected to Zone 6 mains located in Marsh Creek Road.

To reach the reservoirs in upper pressure zones, the District would have to pump the treated water through Pressure Zones 1, 2, and 3. Increased water demand due to the project would add to the requirement for additional pumps in the District's lower pressure zones. Costs for these improvements would be the District's responsibility; however, the District would be compensated for these improvements by a facilities reserve fee charged to the developers. All other improvements would be the financial responsibility of the project sponsor. Costs would also include acquisition of land for any necessary off-site reservoirs.

d. **Mitigation Measures**

To provide water service to all of Keller Ranch, the project sponsor must apply to LAFCO for annexation to the Contra Costa Water District. Annexation will have to be approved by the Water District Board.

The City must work with the Water District in ensuring the design of an efficient water distribution system to eliminate under-pressured pockets.

The developer shall be required to screen all new reservoirs with landscaping and/or earthen berms to eliminate their visual impact.

If water service sufficient for fire protection cannot be provided, lots proposed above 955 feet in elevation should be eliminated or relocated.

Sewer

a. Potential Impacts

Sewage generated in the Clayton Planning Area is currently transported via a sewage collection system operated by the City of Concord. The present trunk sewer system within Clayton consists of 12, 15, and 18 inch sewer lines. This system carries sewage effluent via the Concord Boulevard trunk sewer to waste water treatment facilities of the Central Contra Costa Sanitary District located in Pacheco.

The current capacity of the Central Contra Costa Sanitary District's treatment plant is 38 million gallons per day (mgd) based on a secondary level of treatment. The 1980 average dry weather daily flow was close to 35 mgd and it is obvious that the plant is operating near its authorized discharge capacity (Hall, 1982). Proposed plant improvements, now in the design stage, will provide additional treatment capacity of 45 mgd and this work is anticipated to be completed by late 1985. The District cannot guarantee that sewer connections will be available for any proposed developments until the planned expansion of the treatment plant is completed.

Based upon intended capacity, buildout development in Clayton will require increase in capacity of the treatment plant and in the lines through Concord.

The buildout development of Clayton will generate between 891,584 (1821 new units) and 1,035,136 (2359 additional new units) gallons of sewage per day assuming 3.2 persons per unit, 95 gallons per capita daily and 10,000 gallons per acre for 31.8 acres of commercial development.

A major trunk line must be completed to serve area growth. Developers have agreed upon funding the construction of a trunk line and their receiving reimbursement at the time of building permit.

Demand for sewage treatment by the proposed project would constitute over 2.5 percent of the Central Contra Costa Sanitary District's present 38 mgd treatment capacity. The plant is operating at near capacity. Therefore permits may need to be provided on a discretionary basis until expansion is complete.

b. Mitigation Measures

Infrastructure plans need to be adopted that will identify facilities, method of initial payment and method of long-term reimbursement.

The City of Concord has a series of hook-up charges that are intended to offset system improvements.

Solid Waste

a. Potential Impacts

Build-out of the City will increase the generation of solid waste. Solid waste services are provided by Pleasant Hill Bayshore Disposal Service. Present dumping is at the Acme Land Fill site in Martinez. This land fill is nearing capacity. The County is presently studying new disposal site alternatives.

b. Mitigation Measures

Increased use of trash containers and source separation for recycling have been effective methods used in other jurisdictions. Clayton should support these efforts. Ultimately new disposal sites will have to be designated in Contra Costa County.

Energy Consumption and Conservation

a. Potential Impacts

Major energy consumption at the time of construction is attributed to grading. Energy consumption in completed facilities is affected by solar access, orientation and design. Energy consumption due to transportation is reduced by alternatives to single-passenger auto use.

b. Mitigation Measures

Mitigation measures related to construction can be found in Appendices B and G and mitigation measures related to transportation can be found in the Circulation Element.

Medical Services

a.. Potential Impacts

There are two emergency medical clinics in Clayton located at the Kirker Corridor and in the Town Center. Area hospitals include John Muir in Walnut Creek and Mount Diablo in Concord. Growth will increase pressure on the delivery of medical services; however, market demand will increase availability of clinics and anticipated population may generate additional State funding.

Telephone, Cable, Electricity and Natural Gas

a. Potential Impacts

Growth will generate demand for utilities. Since the City of Clayton is urbanized, the extension of private utilities does not appear to pose any limitation.

b. Mitigation Measures

The City is considering establishment of utility corridors for utilities to limit conflict and intrusion.

UNAVOIDABLE SIGNIFICANT ADVERSE ENVIRONMENTAL EFFECTS

The adoption of this Plan did not generate any new unavoidable significant adverse environmental effects. The plan provides analysis of the existing setting, review of the potential for vacant land and balance between the many government agencies and local interests. Any development will affect four conditions: land use, air quality, water quality and traffic. In each case, the adopted Plan's effects do not significantly alter previous plans or approvals. The issues are summarized for the sake of perspective.

1. **Land Use**

The growth anticipated but not generated by the General Plan will convert undeveloped areas of the City to some form of development, principally residential. However, this is offset by the objectives of the Plan that encourage in-fill development and restrict development outside of the existing developed area. Therefore, the land use impact created by development is reduced by the community's desire to retain open space and rural character.

2. **Air Quality**

The growth anticipated but not generated by the General Plan will add air pollutants. The Plan has several sections which reduce the amount of pollutants generated to the least amount feasible but, it is impossible to mitigate the problem entirely. It is noted that Clayton's contribution to increased air pollutants on a regional scale is a small fraction of the overall increase anticipated by new development.

3. **Water Quality**

Additional growth will also contribute more water pollutants than exist today to surface water. These occur from increased refuse and automobile fluids being washed from City roadways into the local drainage and creek system.

4. **Traffic**

New development will generate traffic on Clayton streets as well as on major corridors leading toward employment. It will be necessary to respond to impacts by developing a transportation model and mitigating problem areas.

ALTERNATIVES TO THE PROPOSED ACTION

The No Project Alternative is considered infeasible because the City is required by State law to adopt a General Plan with seven mandatory elements and a consistent zoning ordinance. The General Plan does not expand the area of development. It refines existing policies. An alternative to this is not practical.

1. **Greater Urban Density Alternative**

The General Plan proposes a land use pattern that is low density overall. An alternative would be to increase densities overall to allow extensive urban development and result in a substantially higher population than intended. While this alternative would create a much greater opportunity for affordable housing, new jobs, and commercial business, it would require a significant change to the existing developed area of the City, to the community's desire to retain a rural character, and to the analysis and mitigation of impacts.

Because the Clayton Valley is nearly built-out, urban development would require extensive redevelopment. It would require an expanded circulation system and changes in development standards. This alternative is rejected because it is infeasible based upon the existing development and economics of today. Significant redevelopment and displacement would occur at a tremendous social and economic cost to the community. The Clayton setting is not suited for major expansion of services and extensive urban development while it is trying to retain a rural lifestyle. The growth proposed will require substantial design and environmental mitigation on the project level.

2. **Reduced Growth Alternative**

The General Plan process was compelled to consider alternatives. From the level of individual parcels to policy applications, alternatives were considered by two different committees, the Planning Commission and the Council. The alternative land use designations are indicated in Exhibit X-1. The adopted plan provides an increase above the previous plan but does not reach the level proposed by the Housing Element committee.

**THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES
OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND
ENHANCEMENT OF LONG-TERM PRODUCTIVITY**

The General Plan combines both short-term planning in zoning implementation measures and long-term productivity, maintenance, and enhancement of the City's General Plan. Therefore, the General Plan is designed to achieve a reasonable balance between what can be done today and what should be reserved for the future. Particularly, the policies of the Plan preserve Clayton's rural character over the urbanization that is continuing to occur in most California cities. The General Plan is a growth management scenario that emphasizes long-term productivity over short-term gains or uses.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

The secondary effects of the General Plan include anticipated growth that will commit undeveloped land to development, nonrenewable energy resources to use, and the City to a definite course of action consistent with the Plan. The General Plan seeks a balance based upon expressed community values between what will be lost and what will be preserved or enhanced. The Plan will preserve Clayton's rural character even though some development will occur. The overwhelming majority of the outlying open space that exists today will be preserved while open space within the developed areas without adverse slopes will be developed. In this manner, the Plan proposes a long-term community planning scenario that will minimize resource depletion.

GROWTH INDUCING EFFECTS

Any change in the General Plan affects growth. The purpose of this effort was to clarify policies and issues as well as improve the base of local information. The existing General Plan would allow a total of 2,455 units. The General Plan Committee alternative allowed 3361 units, the Housing Element Advisory Committee proposed 3,899 units, the adopted Plan identifies a maximum of 3,399 units.

The numbers do not represent a wide range. The City is opposed to additional development to the east of Keller and in this way none of the alternatives represent a stop toward additional growth. It must be recognized that utilities developed for the Keller Ranch could be extended further east.

**SUMMARIES OF RESPONSES TO NOTICE OF PREPARATION
AND STAFF COMMENT (2/13/85)**

CITY OF CONCORD

Written statement confirmed telephone conversation that the NOP map was in error and that the plan maps will not include areas within the Concord Sphere of Influence or City limit.

Staff Comment

The NOP map was taken from the 1971 Wilbur Smith General Plan. It had no legal or intended status other than a general indication that the Clayton plan revision was comprehensive rather than a response to a project. The maps in the draft plan have been drawn with the intent for accuracy and based on the best available information. It is the intent of the City of Clayton to have a document that is thorough and provides reliable base information for future decisions. Further corrections are anticipated in the draft and the City looks forward to the assistance of the City of Concord.

CONTRA COSTA COUNTY CONSOLIDATED FIRE DISTRICT

Requested design information as to proposed zoning, types and sizes of proposed buildings, projected populations, proposed streets, water supplies and access to open space or wildland areas. The District feels that future development will have a definite impact on district resources and mitigation will be necessary.

Staff Comment

At this time no specific development proposals are being considered. Upon submission of application, meetings will be held between applicant, City and representatives of the Contra Costa County Consolidated Fire District and the Eastern Contra Costa County Fire District. It should be noted that no "new" areas are being considered for development.

CONTRA COSTA COUNTY FLOOD CONTROL

Point out that if current land use plans are modified, significant downstream flooding and erosion could result. Preliminary proposals for improvement of Mt. Diablo Creek between Bailey Road and Marsh Creek have been submitted to the Clayton City Council for review. These improvements are necessary to mitigation the potential flooding of the downstream areas caused by urbanization of the upstream areas. No action has yet been taken on the preferred alternative. More intensive development in the Clayton Planning Area will increase the area of impervious surface which may affect Mt. Diablo Creek within the downstream of the City of Clayton. Flooding generated by Mt. Diablo Creek also has the potential for affecting other watershed areas. The EIR should evaluate these impacts.

Staff Comment

The review of the Land Use/Housing Elements will support the notion that there are no proposals for new development from the standpoint of flood control. The development of the Keller Ranch will require specific on-site and downstream flood control measures.

This level of project detail is not available at this time.

Clayton does need to develop a firmer base of drainage and creek overflow information in order to facilitate parcel improvements and evaluate future flood control project needs. Consideration of flood project alternatives will be presented to the City of Clayton soon. Clayton hopes that the draft General Plan review will serve as a catalyst to identifying infrastructure needs and pointing out logical steps for their improvement. The City will look forward to working closely with flood control on mutual needs.

CONTRA COSTA RESOURCE CONSERVATION DISTRICT

No comment at this time.

CONTRA COSTA SANITARY DISTRICT

Any development within the City of Clayton presently uses or will be connected to the City of Concord's collection system. Any information regarding the collection system such as size, slope, depth, capacity, etc., should be directed to the City of Concord.

This District's concern of existing or future effluent generated by developments within the City of Clayton is limited to the impact on the District's wastewater treatment facilities at Pacheco. Present flows based on 1984 average dry weather flow is approximately 35 mgd, which is near its authorized discharge capacity of 38 mgd based on a secondary level of treatment. Proposed plant improvements will provide additional treatment capacity of at least 45 mgd upon their anticipated completion in late 1985.

CENTRAL CONTRA COSTA TRANSIT AUTHORITY

No comment at this time.

CONTRA COSTA COUNTY WATER DISTRICT

No comment at this time.

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Reviewed NOP and while comments submitted are directed to specific projects, the District felt that they could become even more meaningful when directed at general plans.

A five-step process is proposed:

1. Analysis of existing land uses as related to air quality in the plan or project area and in potentially impacted areas nearby.
2. Specification of worst-case air pollutant emissions from, or due to, the project - for the averaging times specified in applicable ambient air quality standards.
3. Consideration of mitigation measures to reduce the air quality impacts of the project. Useful references are: "Local Government Guide to Project Mitigation and Other Improvement Measures for Air Quality", BAAQMD 1983 Draft; and "Guidelines for Air Quality Impact Assessments", Section V, California Air Resources Board, 1983. The Metropolitan Transportation Commission also plans to publish a guide to traffic and air quality mitigation measures in 1985.

4. Use of accepted air quality modeling procedures to produce estimates of maximum ambient pollutant concentrations. For large projects, we recommend the model CALINE3 to evaluate motor vehicle carbon monoxide impacts. (Some simplified modeling techniques are contained in the publication, "Guidelines for Air Quality Impact Analysis of Projects", available from BAAQMD).
5. Comparison of estimated concentrations with State and Federal air quality standards, with respect to maximum values and/or frequency of exceedances.

The points or areas of maximum air quality impact should be defined, and the impacts on sensitive receptors should be analyzed - residential areas, schools, hospitals, nursing homes, playgrounds, park/recreation facilities. Where there are other existing or planned developments in the vicinity of the proposed project, we recommend that cumulative effects also be analyzed. Where mitigation measures are proposed, we suggest that traffic and air contaminant reductions be quantified, and that commitments to implementation be identified.

Staff Comment

To the extent possible these comments are considered in the last section of the Safety Element. It should be noted that it is difficult to respond to complex form letter comments that do not take into account the nature of the plan proposed.

THE STATE OF CALIFORNIA OFFICE OF PLANNING AND RESEARCH

Sent a copy of NOP transmittal notice to State agencies.

STATE OF CALIFORNIA DEPARTMENT OF CONSERVATION

Reviewed the NOP and found that project may result in the loss of valuable farmland. A lengthy series of standard general questions are asked relative to a specific "project".

Staff Comment

Since no new areas are proposed for development, staff would recommend that the reviewers of the Department of Conservation review the Open Space/Conservation section and Environmental Analysis sections of Clayton 2000 and direct specific comments to issues raised.

NATIVE AMERICAN HERITAGE COMMISSION

Stated their responsibility to preserve places of religious or social significance to Native Americans and request to be informed when their interests were affected.

STATE OF CALIFORNIA DEPARTMENT OF PARKLAND RECREATION

Concerned by affect on Mt. Diablo State Park.

Staff Comment

No negative effect is foreseen.

STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION

Sent standard form letter response identifying the need for the following information:

1. Trip generation, distribution and assignment.
2. ADT (average daily traffic), and AM and PM peak hour volumes for Clayton Road, Marsh Creek Road, Main Street and for all significantly affected streets and highways.
3. Volumes for all through and turning movements in the affected intersections/interchanges should be shown.
4. Data should relate to existing and future conditions, the latter with project traffic and with cumulative traffic generated by approved projects within the study area.
5. Proposed mitigation, including modal alternatives and highway improvements, and the proposed financing mechanisms for the same.

Staff Comment

The Circulation Element responds to the form letter issues. It should be noted that no new areas of development are proposed.

SUMMARIES OF DRAFT EIR COMMENTS AND STAFF RESPONSES

CITY OF CONCORD

Concord identified the potential for impacts on its transportation system, sanitary sewer trunk line system, storm drainage system, trails system and other areas. Concord identified the sensitivity of the Concord Pavilion as affecting more sensitive uses and being affected by construction noise and dust. Concord mentioned that previous Keller concerns remain appropriate considerations for the General Plan. Concord expressed the implicit requirement to mitigation inter-jurisdictional impacts through a Clayton ordinance or other means. Concord underscored their need for traffic to be channeled to Clayton Road via a central city connection rather than funneled entirely onto Concord Boulevard.

Staff Comment

The response has highlighted Concord's concerns regarding the effect of development in Clayton upon Concord. There are no major development proposals under consideration at this time. Clayton is interested in meeting with Concord to discuss mitigation measures including fees to meet inter-jurisdictional problems. Considerable discussion in the General Plan EIR was devoted to potential impacts in areas of traffic and other systems. It does not appear from Concord's comment that any of this information is challenged but that the importance of mitigating impacts cannot be overlooked in the development process. Clayton's response to this issue will be twofold. First, any project with potential for generating impacts upon Concord will receive conditions to offset impacts upon Concord through design facility construction or fee. Second, Clayton will begin the process of discussion of ordinances to provide mitigation fees prior to application pressure.

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Approved of the discussion of air quality and recommended a series of minor corrections as follows:

- a. Inclusion of background carbon monoxide concentrations in calculations of Exhibit VII-8.
- b. Changes in Exhibit VII-5 to include recent changes in State and Federal air pollution standards.
- c. Corrections in Exhibit VII-7.

Staff Comments

Staff has responded to all of the minor corrections proposed by the BAAQMD with changes in Exhibits specified.

CONTRA COSTA COUNTY FLOOD CONTROL DISTRICT

Indicated that Flood District studies differed from FEMA and identified a wider area subject to flooding. Suggested that project plans should include ultimate buildout (to the year 2030) that there is substantial encroachment within the 100-year Flood. That flood protection measures have been previously introduced but were met with significant local opposition. Flood Control felt that the draft General Plan should have more discussion on the subject of flooding due to the increased runoff from future developments. Flood Control recommended the addition of sentence to explain the purpose of flood improvements in the EIR.

Staff Comment

The primary comments directed to Clayton General Plan are based on reports and presentations prepared in August 1985. This information will be cited and incorporated into the General Plan. The Flood Control District receives all projects for review and its conditions are incorporated into project conditions. A timetable is being prepared to reconsider the alternatives for flood control measures along Mt. Diablo Creek. The points raised were related to city process rather than need for information.

STATE OF CALIFORNIA ENVIRONMENTAL HEALTH

Requested that additional information be provided with respect to fixed point sources of noise. They requested that the Lone Star Quarry and the Concord Pavilion locations be indicated on noise maps and additional detail regarding their operation be provided. The comment suggested that land uses be reviewed to ensure that sensitive uses were not being exposed to noise unnecessarily. Other comments consisted of minor corrections and the recommendation that if noise potential or exposure is increased, the developer should conduct additional noise studies.

Staff Comment

For all new sensitive development, noise mitigation will be required at the design stage. The Concord Pavilion and Lone Star Quarry each have potential development nearby. Development in these areas will use existing topography and manmade attenuation measures to reduce this factor and will be added upon development. Minor corrections will be made in the test and requirements for additional noise study when necessary will be required.