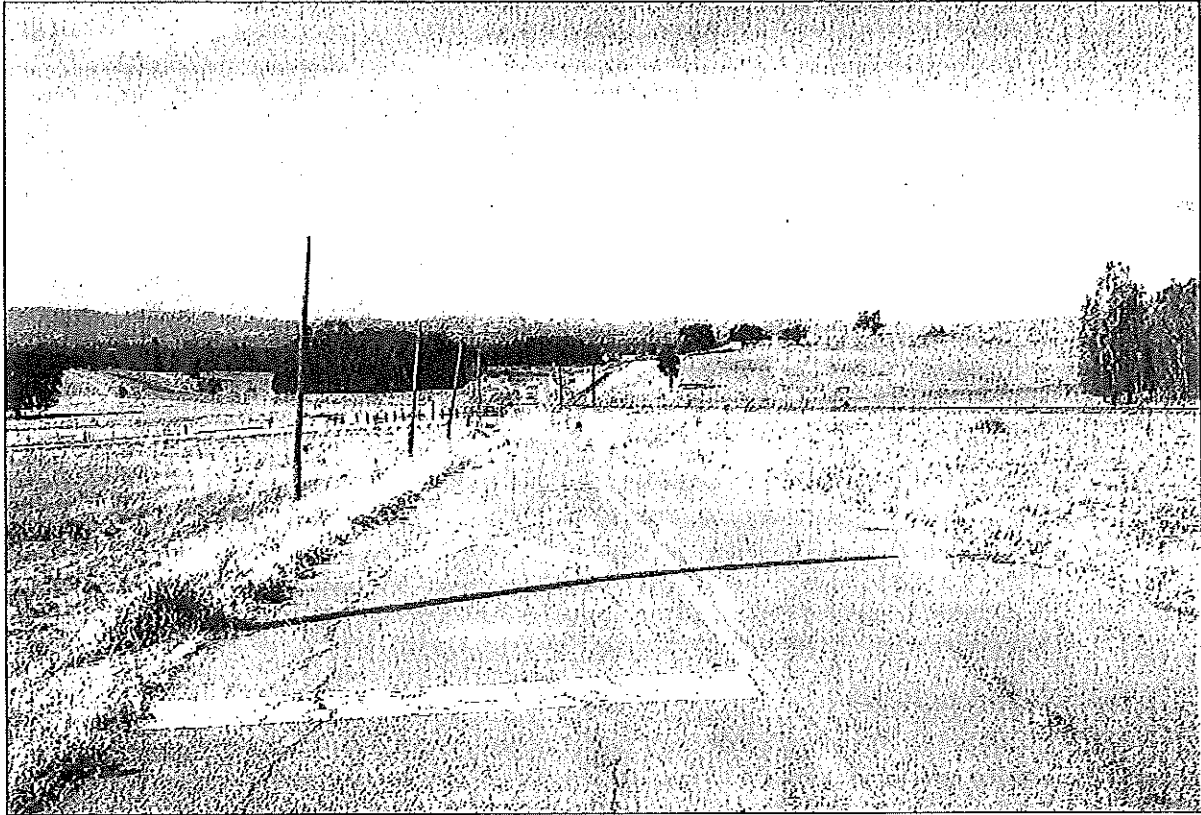


AGENDA ITEM 4



Summary

S.1 Introduction

This document is a Draft Environmental Impact Report (EIR) addressing the potential environmental consequences of implementing a plan for the reuse of a large portion of the Inland Area of the former Concord Naval Weapons Station (CNWS), also known as the U.S. Naval Weapons Station Seal Beach Detachment Concord. The site is located entirely in the City of Concord, and the City is acting as the Lead Agency for the reuse planning effort and the preparation of this EIR, in compliance with the California Environmental Quality Act (CEQA).

This document is a revised version of the Draft EIR that was released by the City in May 2008. That Draft EIR addressed seven alternative reuse concepts for the site. This Draft Revised EIR addresses the potential environmental impacts associated with implementing the Preferred Alternative or the Concentration and Conservation Alternative that have resulted from an extensive community planning effort for the reuse of the site.

This Draft Revised EIR is subject to public review and comment. A 45-day public review period will begin upon the release of this document, during which the City will solicit input from the public and from public agencies at the federal, State, and local levels. Following the close of the public review period, comments on the Draft Revised EIR will then be addressed in a Final EIR. The City will consider the comments and responses prior to deciding to certify the Final EIR and adopt a Reuse Plan.

Site Description

The Inland Area of the CNWS (the site) was opened by the Navy in June 1944 and was closed in November 2005. In December 2005, the Secretary of Defense designated the City as the Local Reuse Authority (LRA) responsible for developing a Reuse Plan for the site; the Navy designated the 5,028-acre site as surplus in March 2007, and that action initiated the process to prepare the Reuse Plan for the site.

The site is crossed by State Route (SR) 4, east of its interchanges with Interstate Highway (I-) 680 and SR 242, as well as the rail line of the Bay Area Rapid Transit (BART) District system connecting eastern Contra Costa County to other parts of the San Francisco Bay Area. In addition, the site is crossed by Willow Pass Road and Bailey Road. The western portion of the site is relatively flat, and the area north of Bailey Road is traversed by Mt. Diablo Creek. The Los Medanos Hills, rising to over 1,100 feet in elevation and with slopes in excess of 30 percent grade, form the eastern portion of the site. Abandoned military facilities, including earth-covered ammunition bunkers, administrative and warehouse structures, and rail and road systems, can be seen from the perimeter of the site as well as from the roads that cross it. The most apparent current use is livestock grazing that occurs on approximately 90 percent of the site. The site is not open to the public, is currently surrounded by a security fence, and is patrolled by federal police.

The site is currently owned by the Navy. The Concord 2030 Urban Area General Plan (General Plan) designates the site as Public/Quasi-Public – Concord Naval Weapons Station – Inland Area. It does not provide a specific policy framework for future uses and development at the site, but recognizes this will be established by the Reuse Plan. The site

is currently zoned as S (for Study Area). When a Reuse Plan is approved for the site, the General Plan will need to be amended to incorporate the land use designations in the plan, and the Zoning Ordinance and other City requirements will also need to be amended to reflect the land uses that will be allowed at the site. The amendment of the General Plan and subsequent specific plans will be subject to compliance with CEQA.

S.2 Reuse Planning Effort

Initiation of the Planning

In 2006, the City initiated a three-phase multiyear project to develop the Reuse Plan for the site. During the 6-month period of Phase 1, hundreds of residents and community leaders offered their ideas and thoughts about the issues, opportunities, and priorities to be addressed while planning for reuse of the site. Based on this input, the City developed a Vision Statement for a creative, innovative, world class Reuse Plan using a balanced approach to meet community interests, needs, and requirements. The Vision Statement also called for the Reuse Plan to be economically viable and sustainable, and to maintain and enhance the quality of life in Concord and the region.

The City's vision was developed into a set of overarching goals to direct the subsequent planning effort. These overarching goals, which constitute the overall project objectives, are:

World Class Project

- Adopt a long-term view in creating a plan that benefits all future generations and engenders a sense of community pride.
- Encourage creativity and innovation in the plan.
- Develop a high-quality project that shall be recognized internationally for its innovative planning and development concepts.

Balanced Approach

- Balance multiple interests including a broad range of community needs, regional as well as local requirements, and the need for parks and open space with the need for jobs, housing, and community facilities.

Economically Viable and Sustainable Development

- Maintain long-term economic viability of the project by ensuring that capital costs and future operations and maintenance costs are satisfied on a self-sustaining basis.

Quality of Life

- Ensure that the plan builds on community assets and opportunities, addresses critical needs and issues, creates net positive benefits, and provides new opportunities to live, work, and play in Concord.

The goals for the Reuse Plan were then developed into a set of Guiding Principles for the planning effort. Those Guiding Principles are available for viewing at the project website, which is located at www.concordreuseproject.org.

As a result of the Phase 1 effort, the City Council approved recommendations for the formation of a 21-member Community Advisory Committee (CAC) and Technical Advisory

Groups (TAGs) to provide input to the subsequent planning effort. The City Council also developed a Planning Framework, which it adopted and published in August 2006. This document is also available online at the project website.

Phase 2 of the planning process began in November 2006. The first stage of this work culminated in a public, informational "Get the Facts" Open House on March 17, 2007. At the Open House, information was presented about the community and the site, including physical, environmental, economic, and social characteristics. Copies of the information displayed at the Open House are also on the project website.

Following the Open House, the City completed an analysis of the site capacities and constraints, which it shared at a public workshop (entitled "Applying Goals and Guiding Principles"), held on April 21, 2007. The workshop participants identified themes they would like to see incorporated into the reuse planning effort, expressing a strong preference for the following four planning themes:

- Higher-intensity uses around the North Concord/Martinez BART station
- Lower-intensity uses between Willow Pass Road and Bailey Road
- Preservation of the Los Medanos Hills above a 30 percent grade and the ridgeline, with incorporation of hiking trails
- Protection and enhancement of Mt. Diablo Creek with a trail along the creek for walking and biking

A second planning workshop (entitled "Balancing the Land Use Mix"), held on June 16, 2007, focused on examining the choices regarding scale, magnitude, and balance of land uses, as well as understanding the relationship between the site and the surrounding urbanized area. The workshop participants completed worksheets (15 total) representing their ideas for reuse of the site.

While the planning exercise at the June 2007 workshop provided a broad foundation for understanding the community's desires and expectations, the wide variety of schemes identified and the feedback from the CAC indicated that additional comment and discussion from policymakers was needed to help guide the development of alternatives. During June and July 2007, the City held a series of meetings with the CAC and other City boards and commissions to address the following four key reuse issues:

- Level of intensity of use
- Arrangement of land uses and transit
- Distribution of open space
- Role of buffers between and transitions to surrounding land uses

These four key issues shaped the development of the alternative concepts, and the City Council held public workshops on August 4 and September 11, 2007 to discuss these four key issues. This input was used by staff to develop five alternative concepts for reuse of the site.

On September 18, 2007, the CAC met to review and discuss the five initial alternative concepts and to receive public comment. This resulted in a request for more information on

the alternative concepts and a desire to expand the range under consideration. On October 2, 2007, the CAC adopted a resolution recommending that seven alternative concepts be approved by the City Council acting as the LRA for analysis in a Draft EIR. On October 9, the LRA reviewed the seven alternative concepts and approved them for analysis in a Draft EIR. Each of the seven alternatives was based on one of three themes. The themes were "Extending the Neighborhoods," "Clustered Villages," and "Concentration and Conservation."

Narrowing the Range of Alternatives

In spring 2008, at the same time that the seven alternatives were being evaluated for environmental impacts in compliance with CEQA in the May 2008 Draft EIR, the seven alternatives were also evaluated against a broader set of criteria established by the CAC. The 16 criteria were grouped into 5 categories and included the following:

- Green Planning: Resource Efficiency, Climate Change
- Transportation: Traffic, Travel Choices, Connectivity
- Community: Community Integration, Community-Serving Uses and Facilities, Housing Variety, Parkland
- Land Stewardship: Viewshed and Hillside Protection, Cultural Resources, Land Remediation, Biological Resources, Watershed Resources
- Economics: Fiscal Sustainability, Financial Feasibility

The results of the evaluations were shared with the public at CAC meetings in April and May 2008 and subsequently at public workshops held on May 28 and June 14, 2008.

At its July 15, 2008 meeting, the CAC decided to narrow the range of alternatives by removing the "Extending the Neighborhoods" theme from further consideration and by adopting a process to select one alternative representing each of the two remaining themes. The next public workshop was held on August 2, 2008, at which participants discussed the evaluations of the alternative themes in small groups and reported their conclusions back to the broader group of attendees.

Modifying the Alternatives

The CAC used input from the workshop to modify and select two alternatives, one for each of the remaining themes under consideration ("Concentration and Conservation" and "Clustered Villages"). Modifications included changing density or intensity of development, moving major land uses to different areas of the site, improving financial performance, and considering the effect of Public Benefit Conveyance (PBC) applications. PBC is a mechanism that the Navy can use to transfer portions of the site to a local public entity such as the East Bay Regional Park District (EBRPD). The CAC also discussed specific issues common to the alternatives, which included the number of housing units and their mix, the balance of jobs and housing density in a transit-oriented development area around the North Concord/Martinez BART Station, an education complex, a first responders training facility, a city-wide park, a tournament sports facility, and a golf course.

The community and the CAC reviewed and refined the two alternatives at workshops and meetings in August and September of 2008. At its September 30 meeting, the CAC decided

it would send both alternatives forward to the LRA, but also express a preference for one of the alternatives. Also at this meeting, the comment letters received on the May 2008 Draft EIR were distributed to the CAC members. On October 14, 2008, after more than 36 meetings (including 8 public workshops), the CAC adopted Resolution 08-1, sending forward both the Concentration and Conservation Alternative and the Clustered Villages Alternative. The resolution also recommended that the City Council, acting in its capacity as the Concord LRA, designate the Clustered Villages Alternative as the preferred CNWS Reuse Alternative. The CAC also forwarded a list of suggestions made by individual CAC members regarding additional potential modifications to each of the alternatives for the LRA to consider.

Selecting a Preferred Alternative

The LRA continued the discussion of the alternatives at its meetings on November 17, 2008, December 1, 2008, and January 12, 2009, taking public comment and discussing further modifications. The selection process culminated on January 12, 2009 when the LRA adopted Resolution 09-5, designating the Clustered Villages Alternative as the Preferred Alternative subject to further environmental review under CEQA. On January 30, 2009, the City released a revised development program, land use diagram, and supporting narrative that incorporated changes requested by the LRA at its January 12, 2009 meeting. The City submitted the updated materials comprising the Preferred Reuse Plan to the Navy, where it will undergo further environmental review, and to the U.S. Department of Housing and Urban Development (HUD) as part of the Homeless Assistance Submission (HAS).

Key Planning Concepts Incorporated in the Alternatives

Both the Preferred Alternative and the Concentration and Conservation Alternative represent the best distillation of the concepts of the former seven alternatives. While they approach the reuse of the site from different perspectives, they both embody key planning principles and guidance accumulated during the 3-year LRA community reuse planning process, and both achieve the four overarching goals established in the community's vision for the site.

The two alternatives represent a balanced approach, with economically viable and sustainable development that will maintain and improve the quality of life for existing Concord residents and establish a framework to support the development of a world class project. The project team has used concepts of scale, density and intensity, location, and connectivity to guide the community through planning for reuse of the former CNWS. Along the way, the community has articulated a refined list of key planning concepts that have also been incorporated into the reuse planning process, including:

- Locate higher-intensity uses around the North Concord/Martinez BART Station.
- Support transit-oriented development around the North Concord/Martinez BART Station, transit service in other developed areas of the site, and a broad range of travel choices (including transit, walking, and biking).
- Integrate the site with existing Concord to improve the quality of life for existing Concord residents and avoid creating "two ConCORDs."
- Create balance in housing types and housing choices.

- Provide for community and cultural facilities including a library/performing arts center/community center, adequate schools for K–12 on-site population, and a tournament-level sports facility.
- Preserve a minimum 300-foot-wide riparian corridor along the centerline of Mt. Diablo Creek.
- Preserve the hills and ridgelines on the eastern side of the CNWS.
- Limit development in areas of 30 percent slope or greater.
- Avoid and/or minimize intrusion into wetlands and into breeding areas and habitat for threatened or endangered animal species.
- Avoid development south of Bailey Road.
- Avoid roads and development east of Mt. Diablo Creek and especially in resource areas containing habitat for threatened and endangered species.
- Maximize open space with facilities and trails that will serve the public.
- Set aside lands and designate them as open space in order to provide on-site mitigation for any unavoidable loss of habitat or wetlands on other portions of the site.

S.3 Reuse Plan Alternatives

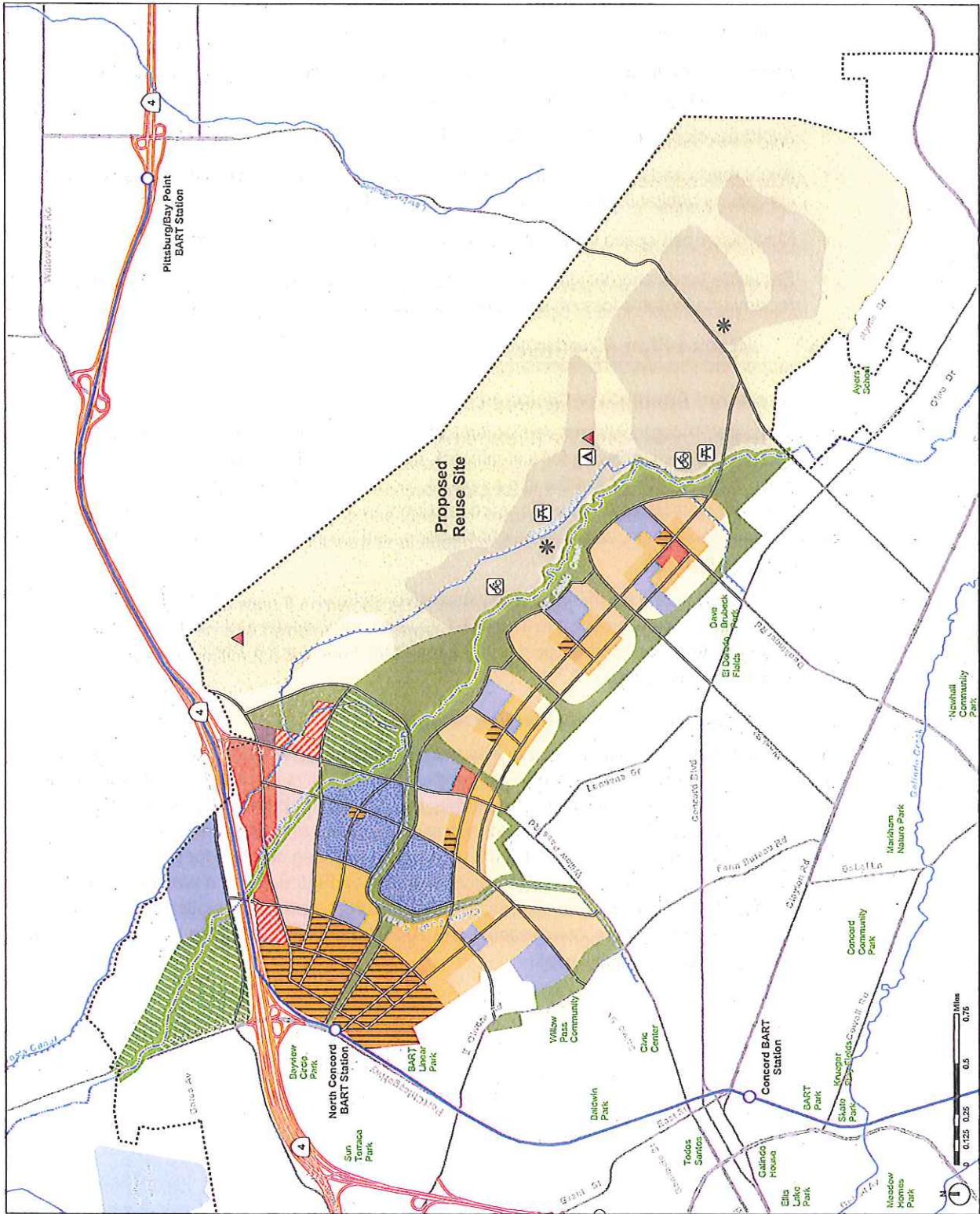
The Preferred Alternative: Clustered Villages

The Clustered Villages Alternative (Preferred Alternative) focuses on a series of villages connected by transit, allowing for a significant, new, diverse development balance while maintaining more than half of the site as parks, recreation, and open space. Living and working options would extend to Concord residents and others, offering a more sustainable lifestyle with mixed-use, walkable neighborhoods, and transit-oriented living along with single-family housing.

The land use diagram for the Preferred Alternative is shown on Figure S-1 and the development program is shown in Table S-1. Overall, the Preferred Alternative provides new land use to accommodate up to 12,272 residential units and 6.2 million square feet of commercial and retail uses.

The Concentration and Conservation Alternative

The Concentration and Conservation Alternative blends two planning concepts that figured prominently during the reuse planning process. The alternative focuses a significant amount of housing, retail, commercial, and community facility uses to the north of Willow Pass Road, while maximizing open space conservation by minimizing development south of Willow Pass Road and east of Mt. Diablo Creek. The land use diagram for the Concentration and Conservation Alternative is shown on Figure S-2 and the development program is shown in Table S-2. Overall, the Concentration and Conservation Alternative provides new land use to accommodate up to 10,203 residential units and 4.8 million square feet of commercial and retail uses.



Legend
Land Uses

- Transit-Oriented Development (Mixed Use)
- High-Density Residential
- Medium-Density Residential
- Medium-Low-Density Residential
- Low-Density Residential
- Commercial Office
- Commercial Retail
- Commercial/Retail Flex Space
- Commercial Hotel
- Community Facilities
- Educational Campus
- Open Space
- Parks and Recreation
- Riparian Corridor
- Golf Course and Tournament Facilities
- Recreation/Residential Low Density Flex Area
- Potential Recreation Areas (Subject to habitat restriction)
- Recreation Sites & Staging Areas (per East Bay Regional Park District (EBRPD) plan)
- Environmental Education, Historical Interpretation & Port Chicago Visitors Center (per EBRPD plan)

Base Map

- Concord City Limit
- Parks and Open Space
- Mt. Diablo Creek
- Other Creek or Stream
- Canal
- Highway
- Arterial Street
- Local Street
- Bay Area Rapid Transit Line
- BART Station

Notes & Sources
Note: Locations of items are illustrative depictions only and subject to habitat mitigation constraints.



Revised August 21, 2009

Figure S-1
Preferred Alternative
Land Use Diagram



Department of
Conservation &
Development

Contra
Costa
County

Catherine O. Kutsuris
Director

Community Development Division

County Administration Building
651 Pine Street
North Wing, Fourth Floor
Martinez, CA 94553-1229



Phone: 925 335-1240

Mr. Michael Wright
Concord Community Reuse Project
Project Director
City of Concord
1950 Parkside Drive
MS / 56
Concord, CA 94519

October 26, 2009

Dear Mr. Wright:

The Contra Costa County Conservation and Development, and Public Works Departments appreciates the opportunity to comment on the August 2009 Draft Environmental Impact Report (DEIR) for the Concord Community Reuse Project. We understand this project to be the biggest single development proposal in the county's history and that the DEIR analyzes three alternatives: No Project, Preferred Project Alternative, and Concentration and Conservation Alternative.

The Preferred Alternative provides new land use to accommodate up to 12,272 residential units and 6.2 million square feet of commercial and retail uses. The Concentration and Conservation Alternative provides new land use to accommodate up to 10,203 residential units and 4.8 million square feet of commercial and residential uses.

The following comments are offered to help ensure this project is implemented in a successful manner.

Transportation Demand Management Mitigation Strategy: 4.1.2.1: State: Page 4-1; also 4.3.4: Assumptions about Potential Impacts with Respect to Transportation: Page 4-63:

The City should be commended for emphasizing transportation demand management (TDM) strategies to mitigate the congestion related impacts of the project. However, in order for this strategy to be considered feasible and effective, the level of effort put in to planning, implementing and funding the TDM program will have to exceed what is typically practiced in Contra Costa, and would likely have to be as ground breaking as the state legislation on which it is based. The County looks forward to seeing an analysis quantifying the effectiveness of the TDM program in the next iteration of environmental review. The County believes that, at a minimum, the following should be included in a TDM program for this project:

- A funding mechanism which provides the capital and operating revenue to ensure that high quality bus service is available for the project's residences and jobs. Transit operators find it difficult to fund existing service levels and rarely can sustain service levels necessary to attract riders with access to an automobile. Frequent bus service will be needed on site and serve major off-site destinations to provide an attractive alternative to driving.

- A funding mechanism to provide residents and employees in the project area with a TRANSLINK pass so that fares will not reduce the attractiveness of transit compared to driving.
- Strategic management of the project's parking supply. This would include reducing the number of parking spaces builders have to include in new development and having the user pay the true cost of the parking. Unbundle parking facilities from the price of housing and commercial space so that owners and renters have the option of paying for parking or not. Parking can add hundreds of dollars to rent or mortgage payments. Commercial portions of the development should be required to charge for long term parking used by employees. The revenues could also be used to fund transit and maintenance of bicycle and pedestrian facilities. These management techniques are targeted at current practices that subsidize or hide the true cost of parking for the user which encourages driving. Commuters are much more likely to walk, bike or take transit if driving involves paying the actual cost for the parking they use.
- A pedestrian and bicycle transportation network that includes safe, convenient, direct, redundant (different facilities for different types of bicyclists {Class I – III}) connections to all origins and destinations. Network development of this type should not be limited to on-site improvements but recognize that travel outside the project boundaries is inevitable. The project should close any gaps in facilities that exist in the surrounding area.
- The provision of ancillary facilities (both on and off site) which would accommodate and encourage non-motorized travel. This would include vastly improved bicycle parking at BART stations in the project area, convenient bicycle parking in residents' homes, shower and locker facilities at any commercial development in the project area.
- Ancillary facilities for carpooling and transit, such as direct connections to the high-occupancy vehicle (HOV) lanes on State Route 4 (e.g. via Willow Pass Road interchange) and extension of these lanes to connect to the I-680 HOV lanes. HOV facilities will help maintain a travel time advantage for carpoolers and bus riders over commuters that drive alone.

Even with an ambitious and effective TDM program, a project of this size will generate motor vehicle trips that will tax the capacity of the freeways and arterials serving the project. The City should implement any feasible capacity expanding projects necessary to mitigate the impacts to the level of insignificance. Potential projects should not be limited to what currently exists in relevant planning documents. Current plans do not assume the development of the Naval Weapons Station and should not be expected to define a reasonable program of projects to mitigate a project of this magnitude.

Existing project lists from the *Contra Costa Countywide Comprehensive Transportation Plan* and the *Corridor Systems Management Plan* (being developed by Caltrans and the Metropolitan Transportation Commission) provide several improvements to help reduce the project's traffic impacts on regional routes. These include extending the State Route 4 carpool lanes to connect with the I-680 carpool lanes, and constructing higher capacity connector ramps between State Route 4 and I-680.

The next iteration of the environmental review should, in conjunction with an analysis of the effectiveness of the TDM program, include a project list that mitigates traffic related impacts to a less than significant level. Collaborative planning and the California Environmental Quality Act¹ would have the City provide this "reasonable plan" for mitigation, regardless of the intent to fund such a project list. This project list or mitigation plan should estimate cost and the project fair-share contribution.

¹ Save Our Peninsula Committee v. Monterey County Board of Supervisors (2001)

Additionally, as development proceeds, project specific traffic studies should be prepared to identify mitigation measures. The project sponsor should monitor and reassess the effectiveness of the measures, working with affected jurisdictions to identify additional mitigation measures, possibly even including capacity increasing projects..

The EIR should describe how the TDM measures will also satisfy the policies in the Growth Management Program for Contra Costa County so that Measure J funding is not at risk.

4.3.3: Model Forecast Methodology: Page 4-53:

Please disclose the results of the model runs in terms of trip generation rates and mode splits for all land use types in the proposed project. please provide additional details related to the adjustments made to the model in an attempt to improve the transit sensitivity associated with the proposed transit-oriented development for each of the two alternatives. The detailed analysis should provide the assumptions made in the adjustments and the effects those assumptions have on the final model forecast. Also, provide an explanation linking the adjustments made to the model and the measures the City will take to ensure a transit-oriented development.

4.3.4: Assumptions about Potential Impacts with Respect to Transportation: Page 4-63:

This impact states that "As individual projects are proposed...specific traffic impact studies will be required...". The EIR should be expanded to not only indicate that these studies will be used to determine the individual projects' traffic impacts and the trigger/timing of the improvements and mitigation measures, but also to determine if additional mitigation measures are required. Further, the project sponsor should work with the affected jurisdictions to identify additional mitigation measures which would facilitate a reasonable mitigation plan.

Project #4 is described as "Evora Road: Widen from Willow Pass to Pomo Street and extend to Port Chicago Highway." Figure 4.14 is not consistent with this project description. Please clarify whether the extension to Port Chicago Highway is part of the No-Project condition or part of either of the project alternatives. The County sees this connection is critically needed to provide improved circulation and an alternate route to State Route 4.

Figures 4-15; 4-16 to 4-22:

Figure 4-15 identifies a distinction between the descriptions of the orange and blue lines shown in the figure. Figures 4-16 to 4-22 indicate that the orange and blue lines and dots shown in the figures to represent the same thing. Please clarify.

4.3.6: Transportation Impacts of the Preferred Alternative: Page 4-107:

This section references "Potentially significant transportation impacts resulting from the development of the Preferred Alternative that remain significant after mitigation..." The County would like to see project specific traffic studies which identify the impacts of the development on the roadway network. The project sponsor should work with the affected jurisdictions to identify additional mitigation measures which would facilitate a reasonable mitigation plan.

6.4.3.6.1: Potentially Significant Project-Specific Transportation Impacts of the Preferred Alternative That Worsen the Future Condition and Remain Significant after Mitigation: Mitigation Measure Transportation 4; Intersection Impact Locations 3, 7, and 10; Starting on Page 4-113:

Please coordinate with the County prior to the approval of a specific development. Several of the Regional Routes referenced are on County owned/maintained facilities, or are in such proximity to a County owned/maintained facility that any measures taken at the said locations will directly impact County facilities, and the County should be involved in identifying a reasonable mitigation plan.

7.4.3.6.1: Potentially Significant Project-Specific Transportation Impacts of the Preferred Alternative That Worsen the Future Condition and Remain Significant after Mitigation: Mitigation Measure Transportation 5; Page 4-117:

Please coordinate with the County prior to the approval of a specific development. Several of the Regional Routes referenced are on County owned/maintained facilities, or are in such proximity to a County owned/maintained facility that any measures taken at the said locations will directly impact County facilities, and the County should be involved in identifying a reasonable mitigation plan.

8. 4.3.6.3: Potentially Significant Contributing Transportation Impacts of the Preferred Alternative That Worsen the Future Condition and Remain Significant after Mitigation: Mitigation Measure Transportation 11; Intersection Impact Location 5: Page 4-123:

These Mitigation Measures indicate that "...the City of Concord will coordinate in good faith with the City of Pittsburg and Caltrans prior to the approval of a specific development...". Please also coordinate with the County prior to the approval of a specific development, as mitigations to this location will either occur on or directly impact County facilities, and the County should be involved in identifying a reasonable mitigation plan.

9. 4.3.6.3: Potentially Significant Contributing Transportation Impacts of the Preferred Alternative That Worsen the Future Condition and Remain Significant after Mitigation: Mitigation Measure Transportation 12: Page 4-125:

This Mitigation Measure refers to "...fair share of the cost...on the adjacent freeway system...". The Impact refers to the segments as "...segments of regional routes." If the Mitigation Measure refers to all 29 segments indicated in the list, the reference in the Mitigation Measure should refer to "regional routes" rather than "freeway system". Additionally, before any specific development is approved, mitigation measures should also be coordinated with the County as several of the Regional Routes referenced are either on or would directly impact County owned/maintained facilities.

10.4.3.6.4: Potentially Significant Contributing Transportation Impacts of the Preferred Alternative That Improve or Do Not Change the Future Condition and Do Not Require Mitigation: Mitigation Measure Transportation 15: Starting on Page 4-126:

This Impact indicates that "...development...would increase traffic volumes and exceed the established performance threshold but not contribute to future deficient conditions on one roadway segment: Bailey Road east of Concord Boulevard...". It is unclear how a development could

contribute additional traffic volumes, yet not contribute to future deficient conditions. Please provide further explanation and data to support and demonstrate this conclusion.

11.4.3.7.1: Potentially Significant Project-Specific Transportation Impacts of the Concentration and Conservation Alternative That Remain Significant after Mitigation: Mitigation Measure Transportation 29; Intersection Impact Locations 3, 7, 8 and 10; Starting on Page 4-136:

Please coordinate with the County prior to the approval of a specific development. Several of the Regional Routes referenced are on County owned/maintained facilities, or are in such proximity to a County owned/maintained facility that any measures taken at the said locations will directly impact County facilities, and the County should be involved in identifying a reasonable mitigation plan.

12.4.3.7.2: Potentially Significant Project-Specific Transportation Impacts of the Concentration and Conservation Alternative That Improve or Do Not Change the Future Condition and Do Not Require Mitigation: Impact Transportation 33: Page 4-142:

This Mitigation Measure indicates that "...traffic from the Concentration and Conservation Alternative would either improve or not contribute to the future condition...". As mentioned above, it is unclear how a development could contribute additional traffic volumes, yet not contribute to future deficient conditions without sizeable mitigation measures. Please provide further explanation and data to support and demonstrate this conclusion.

13.4.3.7.3: Potentially Significant Contributing Transportation Impacts of the Concentration and Conservation Alternative That Worsen the Future Condition and Remain Significant after Mitigation: Impact Transportation 37: Mitigation Measure Transportation 37: Page 4-146:

This Mitigation Measure indicates that "TDM programs will be adopted...". As mentioned above, further information should be provided quantifying the potential reduction in vehicle trips resulting from this strategy, as well as further explanation related to the efforts the City will undertake in order to ensure that the strategies of the TDM will have a meaningful effect. The project sponsor should work with the affected jurisdictions to identify additional mitigation measures which would facilitate a more reasonable mitigation plan.

Mitigation Measure Transportation 38, Intersection Impact Location 5: Page 4-147

There are two Bailey Road planning processes going on right now. The City of Pittsburg is the lead on one (Leland Avenue to SR4) and Contra Costa County is the lead on the other. The City should coordinate with Joel McDaniel at the City of Pittsburg (252-4924) and John Greitzer at Contra Costa County (335-1201) to ensure that any plans developed will be complimentary.

14. 4.3.7.3: Potentially Significant Contributing Transportation Impacts of the Concentration and Conservation Alternative That Worsen the Future Condition and Remain Significant after Mitigation: Impact Transportation 39: Mitigation Measure Transportation 39: Page 4-150:

This Mitigation Measure indicates that "Prior to approving a specific development, the City of Concord shall require future developers at the site to contribute a fair share of the cost to construct planned improvements...". Please coordinate with the County prior to the approval of

a specific development. Several of the Regional Routes referenced are on County owned/maintained facilities, or are in such proximity to a County owned/maintained facility that any measures taken at the said locations will directly impact County facilities, and the County should be involved in identifying a reasonable mitigation plan.

4.3.7.5: Transportation Impacts of the Concentration and Conservation Alternative That Are Less Than Significant: Impact Transportation 46 and 47: Page 4-154:

These impacts indicate that the volume added to the specified roadway locations due to the development of the Concentration and Conservation Alternative would not cause the locations to exceed the established performance threshold, and therefore no mitigation measures are proposed. The project sponsor should work with the affected jurisdictions to identify the impacts the proposed development does have to the roadway and work together to identify mitigation measures which would facilitate a more reasonable mitigation plan.

4.3.7.5: Transportation Impacts of the Concentration and Conservation Alternative That Are Less Than Significant: Impact Transportation 50: Page 4-155:

As part of the Concentration and Conservation Alternative, new bicycle facilities would be provided within the project boundaries. In order to provide connectivity to existing Concord, the report should address the provision of bicycle facilities beyond the project boundaries. Improvements should also be provided which ensure that the connections to all BART stations in the study area (Concord, North Concord and Pittsburg/Bay Point) are seamless.

4.3.7.5: Transportation Impacts of the Concentration and Conservation Alternative That Are Less Than Significant: Impact Transportation 51: Page 4-155:

As part of the Concentration and Conservation Alternative, new pedestrian facilities would be provided within the project boundaries. Building on our comment above, the report should also address the provision of pedestrian facilities beyond the project boundaries in order to provide connectivity to existing Concord. Improvements should also be provided which ensure that the connections to all BART stations in the study area (Concord, North Concord and Pittsburg/Bay Point) are seamless.

In addition to coordinating with the County prior to the approval of specific developments, as mentioned in several sections above, the County should also be included in the review of a comprehensive plan to include a list of mitigations and projects to address project-specific impacts so that a comprehensive program can be developed which results in a more orderly and efficient build-out of the area as compared to individual mitigation plans related to each development project.

Additionally, impacts to the freeway system that are not fully mitigated will impact County roadways as congestion on the freeway results in overflow onto local streets as vehicles are delayed and therefore search for alternative routes. We request to be involved with any discussions with Caltrans or consulted with regarding subsequent studies that will determine the project's contribution to improvements that mitigate its impact on regional routes.

There is an island of County land bordered by Concord on all sides—by Concord Naval Weapons Station (CNWS) to the north, Bailey Road to the west, and Concord Boulevard to the south. This portion of County property should be considered for annexation by Concord, and the development of the CNWS may provide a good opportunity to consider annexation of this property.

All development would be subject to the Airport Land Use Compatibility Plan parameters and, if needed, Airport Land Use Commission discussion and/or review. For questions, please contact Lashun Cross with the County's Department of Conservation and Development.

Due to the proximity of the Concord Community Reuse Project boundary to the Buchanan Fields Airport, please add our Airport Business and Development Manager, Beth Lee, to the distribution list for future reports and notifications. Her contact information is as follows:

Beth Lee
Assistant Director
Contra Costa County Airports
550 Sally Ride Drive
Concord, CA 94520

If you have any questions please contact me..

Sincerely



Steven L. Goetz, Deputy Director
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B. Lee, Contra Costa Airports
B. Neustadter, TRANSPAC
D. Heitman, BART
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T. Harais, Tri Delta Transit
TRANSPLAN TAC

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