



Diablo Range District
15751 Tesla Road
Livermore, CA 94550

Governor's Office of Planning & Research

Apr 05 2022

April 4, 2022

STATE CLEARINGHOUSE

Mr. Francisco Avila, Principal Planner
Contra Costa County Department of Conservation and Development
30 Muir Road
Martinez, CA 94553
Sent via email to: Francisco.Avila@dcd.cccounty.us

RE: SCH Number 2020020323, Draft EIR for the Clayton Quarry Reclamation Plan Amendment Project.

Mr. Avila,

California State Parks (CSP) Diablo Range District is in receipt of the draft Environmental Impact Report for the Clayton Quarry Reclamation Plan Amendment. CSP owns and operates Mount Diablo State Park in Contra Costa County, adjacent to the project area. As a Trustee Agency, CSP is responsible for protecting lands that are held in trust for the people of the State of California within units of the State Park system. Mount Diablo State Park contains significant natural and cultural resources, and provides high-quality outdoor recreation opportunities for the public.

The Mount Diablo State Park General Plan identifies the extensive quarries on the slopes of Mount Zion among the most significant negative visual features. The analysis of Aesthetics and Visual Resources Impact 4.1-3 includes figures showing anticipated change in viewpoint from Mitchell Canyon parking lot. Park users are able to view the proposed project site from higher-elevation vantage points throughout the park. Analysis of this impact should include anticipated change from higher-elevation viewpoints within the park to support the statement that "the impact determination would be the same for all park users at Mount Diablo State Park."

The analysis of Aesthetics and Visual Resources Impact 4.1-4 identifies light related to reclamation activities and security lighting. Mitigation Measure 4.1-4 would limit reclamation activities to daylight hours, later described as between the hours of 7 a.m. and 7 p.m. It is unclear if security lighting will be maintained outside of construction hours, or if lighting would be utilized for construction during times of the year that sunset occurs earlier than 7 p.m.

The analysis of Geology and Soils Impact 4.4-7 references the Hydrology and Water Quality Section 4.6. Mitigation Measure 4.6-4b requires incorporation of all erosion control measures recommended in the geotechnical evaluation. The 2017 geotechnical evaluation states that slide repair was in process at that time, and park staff continue to observe evidence of downslope creep of surface materials at Mitchell Canyon Road. CSP is concerned there is potential for unstable soil and erosion even after all

measures from the geotechnical evaluation are completed. Mitigation Measure 4.4-4 calls for slope stability monitoring of the east quarry slopes. CSP recommends expanding this measure to include monitoring the full project area in order to monitor slope stability and provide updated recommendations for erosion control in the future. Additionally, CSP requests that Mitigation Measure 4.6-4b include implementation of future erosion control measures as identified and recommended by future evaluations.

In conclusion, CSP appreciates the opportunity to provide input on this draft EIR. If you have any questions about this comment letter or would like to discuss project activities, please contact Diablo Range District Environmental Coordinator Gina Benigno at 925-409-8392 or gina.benigno@parks.ca.gov.

Sincerely,

DocuSigned by:

Eduardo Guaracha

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Eduardo Guaracha

Diablo Range District Superintendent