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Irwin Fust
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James Yarbrough
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Brenda Haynes
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Francie Sullivan
City Member

David Kehoe
County Member

Stephen Morgan
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Dick Fyten
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Kent Hector, Senior Planner
Shasta County Department of Resource Management Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001

April 28, 2016

SUBJECT: Tierra Robles Planned Development Project Environmental Impact Report Comments

Dear Kent,

Thank you for the opportunity to comment on the Tierra Robles Planned Development Project Environmental Impact Report (EIR) Notice of Preparation (NOP). Shasta LAFCO commented on a prior EIR NOP (November 26, 2012) and some of those comments, are included below. Our NOP comments are also based on application materials on file at the County. The application proposes formation of a Community Services District (CSD) which makes Shasta LAFCO a responsible agency. As requested, the following are comments on environmental effects to be analyzed and appropriate impact avoidance or mitigation measures in the EIR:

- Conversion of agricultural and other resource lands;
- The impact of proposed project on Shasta County Fire Department (CSA No.1) services;
- The impact of proposed project on Bella Vista Water District water services; and
- The impacts of CSD formation and operation on:
 - wastewater collection, treatment and disposal;
 - road maintenance services listed in the project summary;
 - open space /oaks /habitat management listed in the project summary;
 - stormwater management listed in the project summary; and
 - stream channel crossings, by vehicle and foot, listed in the project summary.

A Plan for Services, describing services to be provided and infrastructure managed, is required by LAFCo as part of the CSD proposal. Analysis of the physical effects of infrastructure management and service delivery included in the Plan for Services is needed for LAFCo review. Please include this analysis and mitigation measures that would be the CSD's responsibility in the EIR.

Alternatives to CSD formation should also be discussed. This includes potential latent powers activation for an existing district (i.e., Bella Vista Water District) for wastewater, roads and open space management; and the annexation to CSA #8 proposed in an earlier application.

George Williamson AICP
Shasta LAFCO Executive Officer