

Ashley C. Unger

DEPARTMENT OF  
RESOURCE MANAGEMENT  
RECEIVED

December 26, 2009

DEC 28 2009

Lisa Lozier  
Shasta County Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001

PLANNING/BUILDING  
DIVISIONS

Subject: Knighton Retail Center Draft Environmental Impact Report (DEIR)

Dear Ms. Lozier

As a citizen of Shasta County and one of your constituents, I'm writing you to provide my comments on the DEIR for the proposed Retail Center at Knighton & Churn Creek Roads. Specifically, I am opposed to this development, because it violates both the letter and spirit of the current General Plan and Zoning, and defies all logic as to how this development could possibly be economically beneficial and/or socially beneficial to the residents of Shasta County.

A

Changing the General Plan to accommodate this development will permanently change/damage the character of the neighborhood, violate zoning protections regarding the suitability of the subject property for the uses to which it has been restricted, and will detrimentally affect nearby property and community identity. The land in question is very unique in that it is the best of the best agricultural soil in existence (Class 1). This land cannot be traded or substituted. It is what it is, and should therefore remain protected by the General Plan without amendment.

B

The DEIR identifies that development of the Project will add significantly to the existing and future oversupply of retail space, resulting in vacant and abandoned buildings and centers (e.g., Gottschalks, Mervyns, etc.). The DEIR estimates that this condition will exist well beyond 10 years with no "break-even" point identified. The will cause lower property values (both residential and retail), and a continuing degrading of our commercial areas and values. This condition will make the County less attractive to folks that might be inclined to move here, and thus slow the growth rate. The resulting decline of property taxes due to reduced property values and reduced sales tax revenue due to reduced population will result in a negative impact to social services because of the inability to fund these needs.

C

Thank you for your consideration of this important matter.

Sincerely,

*Ashley Unger*

**Letter 78 Ashley C. Unger**

**Response 78A:** The comment is a statement that the project conflicts with provisions of the Shasta County General Plan regarding land use designations and commercial development at the I-5/Knighton Road intersection. Land use designations and potential General Plan conflicts have been addressed in the Land Use and Planning section of the Draft EIR (Section 3.9). As noted on Draft EIR page 3.9-14 Impact #3.9-2, this is a matter of policy that must be decided by the Board of Supervisors.

**Response 78B:** See Response 78A above.

**Response 78C:** Urban blight is discussed and analyzed on page 3.9-2 through 3.9-4 of the Draft EIR. Appendix L (Urban Decay analysis) and Appendix M (Fiscal Impact Analysis) provide additional detail on this subject. Comments regarding opposition to the proposed project should be directed to the County Planning Commission and Board of Supervisors during project deliberations.



**SIERRA  
CLUB**  
FOUNDED 1892

**SHASTA GROUP**  
**MOTHER LODE CHAPTER**  
P.O. Box 491554  
REDDING, CA 96049-1554  
(530) 547-0777  
www.motherlode.sierraclub.org/shasta

RECEIVED  
DEC 28 2009  
COUNTY OF SHASTA  
PERMIT CENTER

December 27, 2009

Lisa Lozier  
Shasta County Planning Division  
1855 Placer Street  
Redding, California 96001

Re: Knighton Retail Center Draft Environmental Impact Report (DEIR)

Dear Ms. Lozier:

This letter is to express the Sierra Club's strenuous objection to certification of the above-referenced DEIR on multiple grounds:

First and foremost, I believe that it would be irresponsible and contrary to the intent of the California Environmental Quality Act to make momentous planning decisions that will determine the future of Shasta County in myriad ways, as this project would, without the benefit of an up-to-date General Plan. Under California law ( Gov't Code Sections 65100, et seq) every county is required to have a General Plan which acts as "the Constitution for Growth" in that County. Right now the Shasta County General Plan does not contemplate a large-scale commercial operation on the site of the proposed development. This was discussed at length at the highly-charged debate over the Shasta Auto Mall in 2004. We believe the Board of Supervisors got it right when it rejected that impractical project, and that the status quo should remain in effect until a detailed planning effort can be conducted.

I recall being in the auditorium when the ill-fated Auto Mall went down to defeat. The Sierra Club, along with Churn Creek Bottom Homeowners Association, and many others, contended that to put a project of that scale in that area would result in the rapid urbanization of the entire Churn Creek Bottom area. We argued, and some supervisors agreed, that to allow a large project of that nature to proceed without an updated General Plan, or at a minimum a Specific Plan for the area being done, would result in out-of control and unplanned development of that entire area. Now, most observers would agree that putting an Auto Mall in that location as advocated so vociferously by project proponents would have been a huge mistake. Since then little has been done to lay the groundwork for a new General Plan, despite all the outcry over the lack of current, relevant, and state-of-the-art planning tools.

A

B

I do not feel that it would be unfair to the Hawkins Development interests in the least to disapprove this project at this time. They purchased the property in question right after the Auto Mall debacle and immediately began to plan for something that in concept had just been voted down by the Supervisors. Thus, it was a risky and cynical endeavor and they knew it. If anything, this project should be subjected to a *higher* degree of scrutiny under those circumstances.

C

The Sierra Club's Shasta Group is acutely aware of the problem presented by the lack of an updated, properly-prepared General Plan. We are the lead plaintiff in a case now pending in Tehama County Superior Court, challenging approval of the extremely flawed and deficient General Plan that the Tehama County Board of Supervisors approved last year. As I am sure you know, the Tehama County 2008-2028 General Plan provides for up to 1000% growth involving 415,000 new residents in the area between Cottonwood and Red Bluff. In our opposition papers we argued, inter alia, that Tehama County should have looked at things in a more regional manner, considering the growth anticipated in southern Shasta County, not to mention fully analyzing the full build out impacts, which it shamefully did not do. Air pollution and greenhouse gasses, water supply, traffic management, and sewage disposal, to name a few, are issues that do not respect arbitrary lines. Only a regional approach will really address these problems adequately. We make that same argument now with regard to Shasta County's planning for the future in connection with a retail center at Knighton Road or any other large project. A current and properly-prepared General Plan, with ample and adequate public input, is a necessity, and to approve a project of this nature without the benefit of such proper long-term planning is unthinkable and probably contrary to law.

D

We are informed and believe that the General Plan that does exist at present, completed in 1984, was virtually obsolete on the day it was approved, in that it was based on dated and discredited planning ideas from the 1960's and 70's. To go ahead and operate in 2010 with such an empty vessel as a planning guide is to actually have nothing but ad hoc planning, exactly what the General Plan process is supposed to avoid. Approval of an extremely large-scale project such as Knighton Road, coming as it does after the huge debate over the Auto Mall, reinforces this argument. There needs to be continuity and predictability in urban planning, not a system that requires citizens to galvanize themselves over and over, in opposition to one project after another, until they are worn down financially, in spirit, or both. To operate otherwise deprives citizens of their right to accountability and some degree of foreseeability in planning, and gives a

E

huge and unfair advantage to developers with unlimited money to spend. In other words, Shasta County is effectively operating at present without a "constitution for growth" against the requirements of the law. Shasta County has created this mess through lack of planning over the last decade. The residents of Churn Creek Bottom should not have to pay the price for Shasta County's failure to act by having their quality of life and livelihoods impacted in a severely negative way, in contravention to the existing but dated General Plan

E cont.

Finally, approving the DEIR for a project such as Knighton Road could be viewed as a cynical attempt by Shasta County to avoid its planning responsibilities by treating each proposed project as a discreet item that is analyzed without respect to the wider environment around it, as is supposed to be done in a General Plan or comprehensive EIR. This is wrong, and amounts to an abdication of responsibility by Shasta County public officials. The Sierra Club believes that the Board of Supervisors got it right when they refused to approve the Shasta Auto Mall on the grounds that it was contrary to the existing General Plan. There is no reason to change that analytical model now for any reason. What needs to happen now is proper planning for the future, not growth for growth's sake.

F

Apart from our concerns about the lack of a current and modern General Plan, we have additional issues over Air Pollution and Greenhouse gases that are not dealt with adequately in the EIR. It is not possible to measure the impact of one single project in isolation when it is certain to bring in huge amounts of additional traffic in relation to other projects nearby that are as yet not proposed, but that are certain to follow and cannot fairly be denied if this first effort is approved. This is like pushing on the first domino in a long series where the location of the end is unknown. Approval of this project would without question result in grotesque urban sprawl along the lines seen as nearby as Sacramento/Natomas and Roseville. Short term profit and desire for tax money took precedence over quality of life and long-term good for the community as a whole, and now those areas are nothing but seas of homes and strip malls, many of them struggling even now.

G

Similarly, we deplore the urbanization of rich agricultural lands, when other areas are clearly available that could be developed instead. It is as obvious as it can possibly be that there is now a plethora of commercial space for sale or lease in this area, so what is the driving force to development of Churn Creek Bottom? It simply makes no sense to build out farther and farther while the core of the existing commercial area sits largely vacant. Likewise, if we open the door to planning project by project and not regionally, we have no real way of planning for treated water, sewage and other infrastructure for people all over Shasta and Tehama Counties and beyond. On that basis alone we object to the DEIR as inadequate.

H

The Sierra Club is not opposed to development that is environmentally appropriate and responsibly planned and designed. We do ourselves a huge disservice by jumping at almost any commercial development, particularly in hard times as we are now in, if the development is not going to be good for the community for years to come. We believe that, if approved, this project would be a mistake that would be viewed with dismay in the future for the panoply of reasons outlined above.

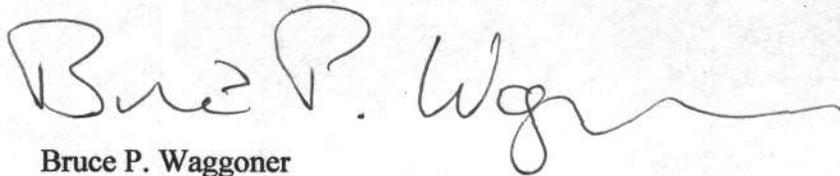
I

Most people I talk to who are residents of this area like it because it is not congested and smoggy like so many other areas of California now are. Yet projects like this seem to gain support with promises of tax dollars and jobs. Much of that will prove to be a mirage unless planning is done thoughtfully, responsibly, and with environmental care.

J

On behalf of the Executive Committee of the Shasta Group, which voted unanimously to oppose certification of the DEIR, and against the Knighton Road project, I submit the foregoing argument. We strongly believe that the time to start real planning is long overdue, and we offer to assist in any way possible to bring about a General Plan that is legally adequate and fully meets the needs of the people of Shasta County.

K



Bruce P. Waggoner  
Group Chair  
Shasta Group  
Mother Lode Chapter  
Sierra Club

**Letter 79 Bruce P. Waggoner, Group Chair, Shasta Group, Mother Lode Chapter, Sierra Club**

**Response 79A:** The comment is a statement that the project conflicts with provisions of the Shasta County General Plan regarding land use designations and commercial development at the I-5/Knighton Road intersection. Land use designations and potential General Plan conflicts have been addressed in the Land Use and Planning section of the Draft EIR (Section 3.9). As noted on Draft EIR page 3.9-14 Impact #3.9-2, this is a matter of policy that must be decided by the Board of Supervisors.

**Response 79B:** The comment is noted. Commenter opposition to the proposed project should be directed to the County Planning Commission and Board of Supervisors during project deliberations.

**Response 79C:** See Response 79B above.

**Response 79D:** See Response 79A above.

**Response 79E:** See Response 79B.

**Response 79F:** See Responses 79A and 79B.

**Response 79G:** Growth inducement is discussed in Draft EIR Section 5.6. Also, see Response 79B.

**Response 79H:** This is an opinion of the commenter that the highest and best use of the proposed project site is for agricultural/open space purposes.

**Response 79I:** See Response 79B

**Response 79J:** See Response 79B.

**Response 79K:** See Response 79B.

Letter 80

**Lisa Lozier**

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**From:** Ardeth Weed [frogdog13@comcast.net]  
**Sent:** Monday, December 28, 2009 4:55 PM  
**To:** Lisa Lozier  
**Subject:** Knighton Road Project.....

To: Ms. Lisa Lozier, Senior Planner  
County of Shasta  
Department of Resource Management  
1855 Placer Street, Suite 103  
Redding, CA 96001

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COUNTY OF SHASTA  
PERMIT COUNTER

This proposal to develop six parcels at the northeast corner of Knighton Road and I-5 is a bad use of rich loamy agricultural soil. This project would consist of commercial retail, dining, entertainment and lodging on approximately 92 acres of prime agriculture land. The planned 740,000 square feet of commercial development equates to more than twice the size of the Mt. Shasta Mall. It would include big box stores, retail shops, restaurants, lodging, food supplies, recreation activities and equipment, traveler services including gasoline fueling facilities, theater and entertainment-related facilities with approximately 3,400 parking spaces. As you also know, there is no sewer nor water system at this location and such extreme traffic demands would cause gridlock. The beautiful and quiet rural lifestyle in Churn Creek Bottom would be forever destroyed.

A

We need ag land to grow our food, not more big box stores to import food/stuff from elsewhere. My grandchildren live in Redding. They need ag land!

Ardeth Weed  
520 Hemlock Way, #4  
Edmonds, WA 98020

(formerly of Redding, CA)

**Letter 80    Ardeth Weed**

**Response 80A:** This is an opinion of the commenter that the highest and best use of the proposed project site is for agricultural purposes due to the quality of soil.

Sewer, water and storm water impacts are addressed in Section 3.13 of the Draft EIR. In addition, the project incorporates facilities to provide water supply, wastewater treatment and disposal and storm water drainage. The Draft EIR and its Appendices analyze the environmental effects of the construction and operation of these facilities and propose mitigation measures to mitigate these effects to less than significant.

Traffic impacts resulting from the proposed project are addressed in Section 3.12 of the Draft EIR and in the Partially Recirculated DEIR (PRDEIR) and the response to comments thereon.

See also, Comment Letter 8, Responses 8D and 8E.

**JESSE WELLS, M.D., 12005 IRON MOUNTAIN RD., REDDING CA 96001**

December 28, 2009

Lisa Lozier  
Shasta County Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001

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COUNTY OF SHASTA  
PERMIT COUNTER

Subject: Knighton Retail Center Draft Environmental Impact Report (DEIR)

Dear Ms. Lozier

As a citizen of Shasta County and one of your constituents, I'm writing you to provide my comments on the DEIR for the proposed Retail Center at Knighton & Churn Creek Roads. Specifically, I am opposed to this development, because it violates both the letter and spirit of the current General Plan and Zoning.

A

Changing the General Plan to accommodate this development will permanently change / damage the character of the neighborhood, violate zoning protections regarding the suitability of the subject property for the uses to which it has been restricted, and will detrimentally affect nearby property and community identity.

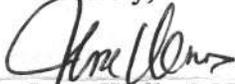
B

Further, the land in question is very unique in that it is the best of the best agricultural soil in existence (Class 1). This land cannot be traded or substituted. It is what it is, and should therefore remain protected by the General Plan without amendment.

C

Thank you for your consideration of this important matter.

Sincerely,

  
Jesse Wells, M.D.

**Letter 81**     **Jesse Wells, M.D.**

**Response 81A:** See Comment Letter 6, Response 6A.

**Response 81B:** See Comment Letter 6, Response 6B.

**Response 81C:** See Comment Letter 6, Response 6C.

Lisa Lozier  
Shasta County Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001

Subject: Knighton Retail Center Draft Environmental Impact Report (DEIR)

Dear Ms. Lozier

As citizens of Shasta County and long time residents, we are writing you to provide comments on the DEIR for the proposed Retail Center at Knighton & Churn Creek Roads. Specifically, we are opposed to this development, because it violates both the letter and spirit of the current General Plan and Zoning. The impacts to the amount of traffic, air quality, water usage and wastewater would be excessive and must be addressed by independent analysis. We also wonder about the advisability of building a huge new shopping center when so many commercial buildings stand empty in the county.

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Changing the General Plan to accommodate this development will permanently change / damage the character of the neighborhood, violate zoning protections regarding the suitability of the subject property for the uses to which it has been restricted, and will detrimentally affect nearby property and community identity.

B

Further, the land in question is very unique in that it is the best of the best agricultural soil in existence (Class 1). This land cannot be traded or substituted or replaced. It is what it is, and should therefore remain protected by the General Plan without amendment.

C

Thank you for your consideration of this important matter.

Sincerely,  
Marily Woodhouse  
Battle Creek Alliance  
PO Box 225  
Montgomery Creek, CA 96065

**Letter 82**     **Marily Woodhouse, Battle Creek Alliance**

**Response 82A:** See Comment Letter 6, Response 6A. Air quality impacts are addressed in Draft EIR Section 3.3 and water usage and wastewater impacts are addressed in Section 3.13.

The comment regarding “the advisability of building a huge new shopping center” is not a comment on the environmental analysis. Commenter’s inquiry should be directed to the County Planning Commission and Board of Supervisors during project deliberations.

**Response 82B:** See Comment Letter 6, Response 6B.

**Response 82C:** See Comment Letter 6, Response 6C.

COMMUNICATIONS

Late Comment Letter 83

MAY 14 2010

Shasta County Supervisors  
1450 Court Street  
Suite 308 B  
Redding, Ca. 96001  
Fax # 530 229-8238

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APR 23 2010

CLERK OF THE BOARD

Mr. Leonard Moty  
Ms. Linda Hartman  
Mr. David Kehoe  
Mr. Glenn Hawes  
Mr. Les Baugh

Honorable Supervisors:

I am writing this letter to discuss the Hawkins Project. I did not write a comment to the draft EIR due to my health. I hope, however, to respond to a modified EIR when you have it submitted to you. I would think the magnitude of the changes or modifications or mitigations (what ever you choose to call the re-submission) will demand a new period of comment from the public.

A

I live in Churn Creek Bottom and have since the late 1960's. My wife and I were a part of the original founders of the Churn Creek Bottom Home Owners Association. We voiced our objections to the then "Flying A" truck stop Project. The sitting Supervisors approved the project and informed the residents the "Freeway and the Off Ramp" pre-destined the intersection to be commercialized. The zoning at the time was unclassified and therefore allowed the usage. We, the citizens of Shasta County, were told we needed to work with the County Planning staff to help adopt "General Plan and Specific zoning" that would provide for future projects. "The General Plan is a 20 year plan for the future of the area and would need to be reviewed and changed to allow further development not adhering to the Plan". We were led to believe "change" would not be on a case by case basis rather a regional basis. Our organization grew to over 380 members in our effort to work with Shasta County to formulate a "General and Specific Plan". Further, we worked with four other groups of people in other areas of the County to help them organize to work with the County staff on the "General and Specific Plan" for each groups remainder of the County. The County adopted the results of that study and we (Shasta County residents) believed we had helped to plan our future community. The "Plan" has to this date not been modified to allow for further "Commercial" development at this I-5 off ramp. Any modification to the "Plan" should be a modification to the entire "General Plan" prior to allowing a change to the "Specific Planning" in any area that is not allowed by the existing "General Plan". The continuing pressure to develop the property now known as the "Hawkins" project is the pre-destination of the I-5 off ramp theory.

B

The I-5 off ramp theory is maybe the main reason I have stayed active in the planning and development process in Churn Creek Bottom. This theory has a major flaw. When the freeway was constructed and the Knighton road off ramp was constructed the location of the existing secondary traffic system, Churn Creek Road, was located a scant several

C

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All Board Members   
Additional Copies to:  
CAO/Analyst  
Res. Mgmt Admin  
Planning

Board Members Received   
Personal Copies

hundred feet east of the I-5 off ramp. Churn Creek Road was and is a small rural traffic corridor. It was expected to handle local traffic only. It was adequate. The location of Pacheco School caused a little additional traffic but did not cause a problem. The West side of the interchange had only "dead-end" traffic and caused no traffic problem. There was no projection of further access roads north or south on the west side of I-5 and the Sacramento River stopped any ingress potential from the west. Traffic was fine. Then, the truck stop was approved. This along with the school created a real traffic problem at times. Still, there weren't any provisions made for the additional traffic. Then, Knighton Road extension to the east was constructed. This added greatly to the traffic problems at the intersection so a stop light was installed. We have to keep in mind there is only a few hundred feet from the off ramp to this intersection with a stop light. Further there is a major truck stop with hundreds of trucks entering and exiting this few hundred feet. Churn creek road to the north of the stop light is still a narrow two lane road that cannot be widened (past the boundaries of the project property) without purchasing and removing housing for well over a mile. The road to the west is still a dead-end road structure with no provision for future additional ingress or egress. Traffic in this intersection has grown, like the rest of the county, from just fine to a problem intersection. What has not changed is any way to add additional access to the area. It is also still just a few hundred feet from the freeway to the stop light.

C cont.

Now, we have a proposal to develop acreage on the north side of the street that has just a few hundred feet of access for ingress and egress between the freeway interchange and the stop light at Knighton road and Churn Creek road. The development will generate many thousands of vehicles entering the few hundred feet of roadway which is the only access. Churn creek road to the north is narrow and cannot be widened. Knighton road to the east has a stop light. The west side of I-5 does not have access. Thousands of cars, trucks, busses, motorcycles, RV's, and potentially pedestrians are all going to enter and exit a few hundred feet of roadway. This will translate to hundreds of vehicles and pedestrians every minute. The freeway and the stop light are both a major factor to this movement. The planners of the freeway interchange in the 1950's and early 1960's did not consider this problem when the interchange was installed.

#### Now the inevitable freeway interchange theory.

Consider if you will the traffic problem created on I-5 freeway and the Knighton road interchange due to the truck stop traffic when the recent snow storm occurred closing I-5 North. It demonstrates the massive problems which will be an everyday occurrence at the Knighton road interchange and on Northbound and Southbound I-5 if this project is allowed. The problems caused by the minute amount of space involved in the access at this interchange over shadow the inevitable "nature" of this interchange. I have stayed involved in the planning process due to the problem this traffic will cause me in my desire to live in this area.

Traffic is only the worst of the problems caused by a major commercial development at this location. It might be the only problem that cannot be mitigated however, other major problems like the 100 year flood problems, sewage problems, contamination of the

D

aquifer, noise pollution to the local community, loss of agricultural class soils, the legality of spot changing of the General Plan, etc.etc. are all major concerns. The zoning in the General Plan was adopted for a very real reason. A vision of future traffic by the Staff of Shasta County and Churn Creek Bottom residents was a major factor in this decision.

D cont.

Ladies and Gentlemen, the responsibilities of the Supervisors for a County are certainly a major undertaking. Trying to balance the needs of the County, adhering to the law, raising needed revenue to finance the needs of the county, meeting the needs of a growing population with housing and employment opportunity, and leaving our community in a better condition when you are finished serving your community is only a part of this task. This huge project seems to fulfill many needs for the community. But, the problems this project will create overshadow the many apparent benefits. A denial of this project certainly will affect the owner and developer of the proposed property financially but will create a massive problem for all of the citizens of Shasta County. The owner and developers financial health is not the County Supervisors responsibility. The long term liabilities of the County's citizens are your responsibility. This is a very difficult decision but please shoulder your responsibility, represent the interests of all the present and future citizens of Shasta County, and deny this project!!!

E

Thank you for reading this long letter and considering its contents.

Sincerely;

Gary J. Singleton  
7039 Ceres Court  
Redding, ca. 96002  
530 510-5000

**Letter 83 Gary J. Singleton (Late Comment)**

**Response 83A:** The comment is noted.

**Response 83B:** The comment is a statement that the project conflicts with provisions of the Shasta County General Plan regarding land use designations and commercial development at the I-5/Knighton Road intersection. Land use designations and potential General Plan conflicts have been addressed in the Land Use and Planning section of the Draft EIR (Section 3.9). As noted on Draft EIR page 3.9-14 Impact #3.9-2, this is a matter of policy that must be decided by the Board of Supervisors.

**Response 83C:** The comment is noted. Traffic impacts resulting from the proposed project, including impacts identified by the commenter, are addressed by Mitigation Measures #3.12-1a through #3.12-8 beginning on page 3.12-15 of the Draft EIR and in the Partially Recirculated DEIR (PRDEIR) and the response to comments thereon.

**Response 83D:** The comment is noted. Comments regarding opposition to the proposed project should be directed to the County Planning Commission and Board of Supervisors during project deliberations. Noise impacts are addressed in Draft EIR Section 3.10, water quality is addressed in Section 3.8, agricultural impacts are addressed in Section 3.2, sewer, water and storm water impacts are addressed in Section 3.13, and traffic impacts are addressed in Section 3.12 and in the Partially Recirculated DEIR (PRDEIR) and the response to comments thereon. Also, see Response 83B above.

**Response 83E:** The comment is noted.

Anderson-Cottonwood Irrigation District

Brenda Haynes, President  
Shawn Kreps, Vice President  
Robert Blankenship, Director

2810 Silver Street, Anderson, Ca. 96007  
(530) 365-7329 - Fax: (530) 365-7623  
www.andersoncottonwoodirrigationdistrict.org

J.D. Leitaker, Director  
Jason Munson, Director  
Stan Wangberg, GM/Sec

April 22, 2010

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SHASTA COUNTY

APR 23 2010

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

Ms. Lisa Lozier  
Department of Resource Management  
Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001

**DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE KNIGHTON &  
CHURN CREEK COMMONS RETAIL CENTER, GENERAL PLAN  
AMENDMENT #08-002 AND ZONE AMENDMENT #08-003, SCH# 2009012088,  
SHASTA COUNTY**

Dear Ms. Lozier:

Having reviewed the above-referenced Draft Environmental Impact Report (Report), I am submitting the following comments regarding the document.

1. Regarding *3.2 Agricultural Resources*

Conversion of Prime Farmland to non-agricultural use

The Report states that the project will result in the conversion of 67.2 acres of Important Farmland, resulting in a significant, unavoidable, and irreversible impact. Proposed mitigation includes establishment of conservation easements at up to three sites at a 1:1 ratio, but it is reported that no mitigation measures can reduce this impact to a level of less than significant.

Indirect conversion and loss of surrounding Important Farmland to non-agricultural use

The Report states that the project may put pressure to develop on adjacent Important Farmland by placing development in close proximity to these lands; may result in land use conflicts and nuisance complaints; and may encourage landowners to convert agricultural land for complementary commercial uses or residential uses. No mitigation measures are available to reduce this impact to a less than significant level; therefore, this impact is significant, unavoidable, and irreversible.

Conflict with existing zoning for agricultural use

The Report states that the project would require approval of changes to the current General Plan land use designations and zoning classifications that conflict with the existing General Plan, which encourages agricultural use on the

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project site. No mitigation measures are available, and this impact is significant and unavoidable.

Conversion of prime farmland, and the indirect conversion of adjacent farmland resulting from the project, cannot be adequately mitigated by "preserving" such lands that already exist elsewhere. The loss of such lands by implementation of this project will have a profound and direct impact on the local residents who enjoy and are a part of the agricultural community, as well as all third-party participants in the agricultural community.

A cont.

Any conversion of such lands will detract from the economic viability of neighboring agricultural concerns, and businesses associated with commercial agriculture. The purchase of conservation easements or otherwise "preserving" farmland in other locales will do nothing to mitigate the impacts stated above. Maintaining the status quo at offsite locations does not provide mitigation for the loss of prime farmland, the profits derived from its use, or the degradation of the lifestyle provided by its existence and use.

## 2. Regarding 3.8 Hydrology and Water Quality

### Existing Drainage Facilities

The Report states, on Page 3.8-5 that *"The 36-inch pipe was installed by Caltrans at the time of construction of I-5 to both realign the channel out of the highway right-of-way and to provide drainage for lands east of the freeway."*

This is an arbitrary and inaccurate statement provided by the author of the Report. A.C.I.D. does not provide infrastructure for the provision of drainage services. If existing facilities or structures such as the truck stop or adjacent roadways, or adjacent lands, are drained by the utilization of A.C.I.D. facilities at the locations described in the Report, such uses are unauthorized by A.C.I.D.

In fact, after reviewing project plans for the proposed truck stop on Knighton Road, then-General Manager for A.C.I.D., Albert Davis, submitted a letter to the Shasta County Planning Department dated October 7, 1985 in which he expressly prohibited the introduction of drainage water into A.C.I.D.'s system. A copy of that letter is attached, and please note that in paragraph three Mr. Davis states ***"This area will and does have a drainage problem. A.C.I.D. will not accept any drainage water into any of its ditches, open or pipeline."*** There have been no drainage permits issued, nor approval provided, by A.C.I.D. that would allow such use of its facilities, nor is there a record of any request for the issuance of such permits or approval.

B

To assume that the existing 36-inch pipeline was installed for any purpose other than the provision of irrigation water to District customers is false and misleading; no other purpose shall be introduced without the express consent of the Board of Directors of Anderson-Cottonwood Irrigation District.

### Proposed Project Site Drainage

The report states *"It is proposed that the re-located A.C.I.D. facilities continue to be utilized in combination with on-site detention."*

The project site currently does not utilize A.C.I.D. facilities for drainage, nor will such use occur without the express consent of the Board of Directors of Anderson-Cottonwood Irrigation District.

B cont.

Conclusion

Based on the factors discussed in the foregoing points, certification of the Report should not go forward, nor should the proposed project be approved, unless these issues are adequately addressed in future versions of the Report.

C

The inadequately mitigated conversion of prime farmland to commercial use and misleading and inadequate presentation of plans for the provision of drainage are issues that should, individually as well as cumulatively, prompt rejection of this draft Report.

Sincerely,



Stan Wangberg  
General Manager

Enc: Letter dated October 7, 1985 from Anderson-Cottonwood Irrigation District General Manager to Jim Cook, Shasta County Planning Department.

**Letter 84 Stan Wangberg, General Manager, Anderson-Cottonwood Irrigation District (ACID) (Late Comment)**

**Response 84A:** This is an opinion of the commenter that the highest and best use of the proposed project site is for agricultural/open space purposes.

**Response 84B:** See Comment Letter 8, Response 8C.

**Response 84C:** The comment is noted.



JERRY BROWN  
GOVERNOR

LETTER 85

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



February 1, 2011

RECEIVED  
SHASTA COUNTY

FEB 03 2011

Lisa Lozier  
Shasta County Department of Resources Management  
1855 Placer Street, Suite 103  
Redding, CA 96001

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

Subject: Knighton & Chum Creek Commons Retail Center EIR General Plan Amendment 08-002 and  
Zone Amendment 08-003  
SCH#: 2009012088

Dear Lisa Lozier:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 31, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

A

Document Details Report  
State Clearinghouse Data Base

**SCH#** 2009012088  
**Project Title** Knighton & Chum Creek Commons Retail Center EIR General Plan Amendment 08-002 and Zone  
**Lead Agency** Amendment 08-003  
Shasta County

---

**Type** EIR Draft EIR  
**Description** NOTE: Partially Recirculated Draft EIR/Review Per Lead

Development and operation of a commercial retail and entertainment center on approximately 92 acres in Shasta County, located at the northeast corner of the Knighton Road and the Interstate Highway 5 interchange. When completed the project would include approximately 740,000 square feet of mixed commercial development (which may include retail shops, restaurants, lodging, food supplies, recreation activities and equipment, traveler services and entertainment-related facilities). Development will be phased in accordance with market conditions and require improvement thresholds. The northern most 18 acres of the project site would serve as an open space buffer between the proposed commercial development and existing low-density residential uses to the north and would contain the on-site water storage and wastewater treatment facilities.

---

**Lead Agency Contact**

**Name** Lisa Lozier  
**Agency** Shasta County Department of Resources Management  
**Phone** (530) 225-5532 **Fax**  
**email**  
**Address** 1855 Placer Street, Suite 103  
**City** Redding **State** CA **Zip** 96001

---

**Project Location**

**County** Shasta  
**City** Redding  
**Region**  
**Lat / Long** 40° 30' 35" N / 122° 20' 12" W  
**Cross Streets** Knighton Road and Interstate 5  
**Parcel No.** 055-160-001, 008, 009, 012; 055-270-001  
**Township** 31N **Range** 4W **Section** 29 **Base** MDBM

---

**Proximity to:**

**Highways** I-5  
**Airports** Redding Municipal  
**Railways** Union Pacific  
**Waterways** Churn Creek, Sacramento River  
**Schools** Pacheco Elementary  
**Land Use** Undeveloped fallow land & small-scale agriculture/A-1 Limited Agriculture, PD Planned Development, Restrictive Flood F-2/A-cg Part-time Agriculture, C-Commercial

---

**Project Issues** Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

---

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Game, Region 1; Department of Parks and Recreation; Office of Historic Preservation; Department of Water Resources; Resources, Recycling and Recovery; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 2; CA Department of Public Health; Regional Water Quality Control Bd., Region 5

Note: Blanks in data fields result from insufficient information provided by lead agency.

**Document Details Report  
State Clearinghouse Data Base**

(Redding); Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

---

***Date Received*** 12/03/2010      ***Start of Review*** 12/03/2010      ***End of Review*** 01/31/2011

Note: Blanks in data fields result from insufficient information provided by lead agency.

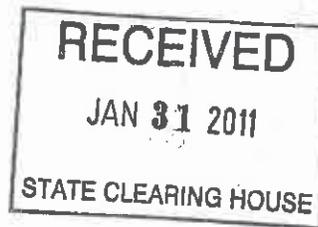
STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

EDMUND G. BROWN JR., Governor



*Flex your power!  
Be energy efficient!*

**DEPARTMENT OF TRANSPORTATION**  
**OFFICE OF COMMUNITY PLANNING**  
 1657 RIVERSIDE DRIVE  
 P. O. BOX 496073  
 REDDING, CA 96049-6073  
 PHONE (530) 229-0517  
 FAX (530) 225-3020  
 TTY (530) 225-2019



January 31, 2011

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1/31/11  
e

Ms. Lisa Lozier  
 Shasta County Dept of Resource Management  
 Planning Division  
 1855 Placer Street  
 Redding, CA 96001

IGR/CEQA Review  
 Sha-5-9.77  
 Knighton & Churn Creek Commons  
 GPA 08-002, Z 08-003  
 Partially Recirculated DEIR  
 SCH# 2009012088

Dear Ms. Lozier:

Thank you for the opportunity to review the Partially Recirculated Draft Environmental Impact Report (PRDEIR) for the Knighton and Churn Creek Commons Retail Center. This comment letter serves to supplement our original concerns. Comments relating to the revisions are described below and in the attachment.

The Draft Environmental Impact Report (DEIR) and PRDEIR, as disclosure documents, must demonstrate that the conclusions presented can be verified by all who desire to review the document including agencies, citizens, adjoining businesses, and decision-makers. As we previously commented, this is critical since 76% of the project traffic will travel on Interstate 5 (I-5). We have numerous concerns with the DEIR analysis and conclusions including: incomplete data, unacceptable trip reductions, inadequate spacing of the project access driveway from the interchange ramps, resultant anticipated traffic congestion, unsafe queuing of the northbound ramps, difficult maneuvering to reach the site, expected long queues, waits through multiple signal cycles, and inadequate study of interchange design alternatives for existing and future uses. We request that project impacts be adequately addressed and commitment to appropriate mitigation be provided prior to certification of the project Environmental Impact Report (EIR) as required by the California Environmental Quality Act (CEQA).

As a Responsible Agency, Caltrans does not accept the DEIR or Traffic Impact Study (TIS) conclusions and cannot make the type of findings necessary for project approval to issue an encroachment permit or allow modifications to the interchange overcrossing and ramps. Caltrans does not recognize this document as adequately identifying and mitigating project impacts to State highway facilities.

A Project Study Report (PSR) and encroachment permit will be required to modify the interchange. In order for Caltrans to approve the PSR and encroachment permit, Caltrans will require that a traffic

Knighton & Churn Creek Commons  
GPA 08-002, Z 08-003  
Partially Recirculated DEIR  
SCH# 2009012088  
January 31, 2011  
Page 2

analysis be provided that satisfactorily addresses the interchange and mainline I-5 operations for the proposed use and future use. Failure of the EIR and TIS to satisfy Caltrans and the Federal Highway Administration (FHWA) may severely delay construction of the improvements to the State highway facilities.

We will continue to work in partnership with the County and the Shasta County Regional Transportation Planning Agency to mitigate traffic impacts of this project. We look forward to receiving and reviewing the responses to our original comments and these supplemental comments. If you have any questions, please do not hesitate to call me at (530) 229-0517.

Sincerely,



MICHELLE MILLETTE, Chief  
Office of Community Planning  
Caltrans District 2

#### Attachments

1. Attachment 1 – Supplemental Comments
2. Attachment 2 – Caltrans I-5 Improvement Plan, Shasta County
3. Attachment 3 – Caltrans Comment Letter dated December 24, 2009
4. Attachment 4 – District 2 Ramp Meter Policy
5. Attachment 5 – Department Ramp Meter Policy

**ATTACHMENT 1**  
**KNIGHTON & CHURN CREEK COMMONS RETAIL CENTER (HAWKINS) PRDEIR**  
**CALTRANS DISTRICT 2 SUPPLEMENTAL COMMENTS**  
**January 31, 2011**

**Feasibility of Mitigation Measures** - As stated in our original comment letter, the forefront issue should be whether there is an obligation to mitigate the project's impacts and to correctly identify that there are methods to insure and monitor their construction through conditions of approval, development agreements, and cooperative agreements. Caltrans requests that the DEIR commit to the appropriate mitigation measures for transportation impacts.

**Traffic Impact Study** - The PRDEIR contains substantial changes to the traffic impact study (TIS). The primary changes are the analysis of the circulation plan on the surrounding intersections and the inclusion of the impacts and mitigation measures for mainline I-5.

During our review we requested all of the technical background traffic study information necessary to replicate, to a reasonable degree, the conclusions reached in the DEIR and PRDEIR. This information is necessary to conduct a complete and thorough analysis of the modified TIS. However, even after a Freedom of Information Act request, only a portion of the technical information was provided. Absent provision of the complete model data including all inputs, outputs, and assumptions, we cannot validate the conclusions and therefore cannot agree that the revised TIS is valid for this project.

The PRDEIR identifies mitigation for the traffic impacts. However, the PRDEIR concludes that the impacts that are outside the County's jurisdiction are significant and unavoidable. The PRDEIR also concludes that the mitigation measures are considered infeasible and will not occur because a guaranteed funding source for the identified improvements has not been identified, or secured. As the owner and operator of the State highway system, we disagree that there is not a guaranteed funding source identified or secured for mitigation improvements, particularly with respect to I-5 mainline. There are several existing traffic improvement plans and programs prepared by the cities and Caltrans that include guaranteed and secured funding sources. This includes the "Caltrans I-5 Improvement Plan, Shasta County" which identifies I-5 improvement needs and funding sources. A copy is attached and can also be obtained from the Caltrans District 2 Website at <http://www.dot.ca.gov/dist2/planning/concepttrpts.htm>. Our analysis shows that most of the project mitigation determined infeasible is identified within one or more of these plans and funding programs. In fact, certain mitigation improvements identified in the PRDEIR will be constructed this year from secure, dedicated funding sources.

**Trip Generation Reductions** - Caltrans has reviewed the internalization (internal capture rate) and diverted link methods presented in the PRDEIR. We disagree that the project qualifies for discounting the trips for the following reasons. The Caltrans Traffic Impact Study Guide considers that a 5% reduction for internal capture is typical, but only when there is a "development pattern of at least 15% of floor area devoted to commercial uses oriented toward use by residences." This is similarly described on page 124 of the ITE Handbook, 2nd Edition, June 2004. The PRDEIR contains no justification for a 24% trip reduction for "internalization" or internal capture. Applying ITE Handbook 2nd Edition Figures 7.1 and 7.2 and Tables 7.1 and 7.2 will clarify the project proposes no office and no residential land use. Caltrans requests that the consultant include the ITE calculation sheets to justify the internalization per these figures and tables, as well as, Figure 7.4, Chapter 7 page 97 Trip Generation Handbook, 2<sup>nd</sup> Edition. Without the County presenting justification or consultation to agree on a reasonable potential discount of trips, a discount is not applicable.

Caltrans disagrees with the diverted link trip reduction presented in the PRDEIR. The "diverted link" trips assumption reduces the project trips by 22%. We agree that diverted link trips can be considered for impacts to mainline I-5. "Diverted Link" trips, trips that are using I-5, go to the project, and get back on I-5

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continuing in the same direction of travel, must be counted at the project driveway. Page 29 ITE Handbook advises, "Diverted linked trips add traffic to streets adjacent to a site, but MAY not add traffic to the area's major travel routes." The project trips still occur at the affected intersections, including the interchange ramp intersections and the project driveway. The study inaccurately reduces the project trips for internal capture and diverted link trips by 46%.

**Level of Significance Threshold** - PRDEIR page 3.12-10 correctly states that, Caltrans endeavors to maintain a minimum target LOS at the transition between LOS C and D on State Highway facilities as stated in the Caltrans Traffic Impact Study Guide. Caltrans does not consider LOS E an acceptable level of service for State facilities which include ramp intersections. The DEIR should identify the state facility locations where the Caltrans threshold is exceeded. Where the LOS threshold is exceeded in the existing condition, CEQA provides for mitigating to the existing conditions. Caltrans considers these impacts to be significant direct impacts for Existing Plus Project Conditions and significant cumulative impacts in the Cumulative Plus Project Conditions. Section 3.12 of the PRDEIR does not accurately represent these impacts to Caltrans' facilities.

**Interchange Concerns** - Our review of the information in Table 3.12-10, finds that the project traffic would severely exceed the capacity of the northbound ramps because the SimTraffic LOS reports indicate a very low percentage of volumes served compared to the demand volumes. The project would also exhaust the capacity of the southbound ramps. The project trips, as estimated in the report, will create an unsafe condition with vehicles expected to queue on the northbound off ramp 100 feet upstream of the exit nose, using the procedure from Caltrans *Highway Design Manual* Figure 504.2B "Deceleration Length" and Index 405.2(2)(e) "Storage Length." For these reasons, location of the project access may have to be relocated to Churn Creek Road in order to provide for the safe and efficient operation of the I-5 ramps. When the actual area conditions are considered, the analysis provided shows that traffic from the ramps will queue onto mainline I-5. Traffic queuing that results in stopped vehicles on an interstate mainline presents a significant safety concern as well as a significant project impact.

Figure 3.12-19 does not show a complete queuing analysis of all roadway intersections subject to analysis in this study.

The revised figures must address the interchange footprint necessary to change the existing geometrics to reflect current design standards. The changes in approach slopes must be considered. As stated in the original DEIR provisions for pedestrians and bicycles also need to be included. The proposed alignment of the northbound offramp affects Caltrans ability to maintain a spread diamond interchange. This further raises the concern that the project driveway be relocated to Churn Creek Road or limited to right-in and right-out movements with a center median barrier on Knighton Road to maintain the current intersection spacing from the interchange ramps. This measure would affect the truckstop circulation as described in the PRDEIR. The resultant anticipated traffic congestion, expected long queues, waits through multiple signal cycles, and difficult maneuvering to reach the site should also be considered in concluding whether emergency access will be impeded at full buildout.

Section 3.12.3 Impacts and Mitigation Measures discusses that the impacts attributable to the project are based on full project buildout. It also states that previous studies have considered the improvements needed,

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**KNIGHTON & CHURN CREEK COMMONS RETAIL CENTER (HAWKINS) PRDEIR**  
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**January 31, 2011**

"at least in part," in studies completed by Shasta County prior to and independent of the current development proposal to rely on funding anticipated to be generated from the Public Facilities Impact Fees. The PRDEIR does not disclose whether the Knighton Road interchange improvements are based on the Shasta County Interchange Improvement Study or other studies. The Shasta County Interchange Improvement Study considers several design concepts with a 4- or 5-lane overcrossing. Several of those design concepts maintain the spread diamond interchange footprint. Therefore, Caltrans will preserve the spread diamond footprint until adequate study of the alternatives is presented to address the ultimate needs for the interchange. This project requires a 6-lane overcrossing. There is no discussion in the PRDEIR whether the Public Facilities Impact Fee program will be amended to prepare for the increased unanticipated costs to build a larger interchange than predicted in existing studies or whether the project would be responsible for funding the increased capacity needed to accommodate this project.

As noted in our NOP response and our original DEIR comments, modifications to the interchange will require Federal Highway Administration (FHWA) approval. The DEIR and PRDEIR lack any discussion of alternative interchange designs. The County and the developer are advised that at the time of application for an encroachment permit the applicants may be required to analyze alternative interchange designs. The expanded analysis may result in improvements that differ from the proposed mitigation measures in the DEIR and PRDEIR. It should be noted that Caltrans and FHWA are the lead agencies for projects within the interstate right of way. Therefore, the applicant will be required to prepare environmental documentation and traffic analysis acceptable to FHWA and Caltrans for those projects.

Impact 3.12-8 of the PRDEIR discusses that 40 pm peak hour truck trips are expected to occur at the Pacheco Road intersection due to truckstop traffic. However, Appendix D, at page 7 states, "[a]s shown in Figure 4, the existing TA driveways serve approximately 100 trucks (in and out) and 185 autos (in and out) during the weekday p.m. peak hour. Appendix A includes the traffic count data." In fact, Figure 4 does not differentiate cars and trucks. Appendix D includes an Appendix A that indicates a consultant counted vehicles, noting whether auto or "heavy truck," entering and leaving several of the truck travel center's driveways, on Thursday July 29, 2010 from 4 to 6 PM. The one day sample data is questionable to establish present driveway volumes. Further, the appendix assumes no growth in future demand for the truck travel center. "Cumulative plus Project PM" Synchro input volume sheet for Intersection #10 Knighton Road northbound ramps shows 657 right turning vehicles per hour and 2 percent heavy vehicles. If half the trucks are northbound and half are entering, that leaves 25. 25/657 is 3.8 percent. Given these facts, Appendix D underestimates the present impact of truck traffic on Knighton Road and the Interstate 5 interchange, and significantly underestimates future impact.

Mitigation Measure 3.12-8a requires that the proponent construct the proposed circulation plan shown in Figure 3.12-20 serving the Travel Centers of America site and the proposed project. However, there is no discussion regarding whether the Travel Centers of America has been consulted or agreed to the proposed circulation changes. The lack of information whether cooperation exists for the circulation plan furthers consideration of analyzing the relocation of the project access to Churn Creek Road.

Caltrans suggests that the DEIR analyze relocation of the project access driveway to Churn Creek Road because of the close intersection spacing from the interchange ramps, resultant anticipated traffic congestion, unsafe queuing of the northbound ramps, expected long queues, waits through multiple signal cycles,

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**January 31, 2011**

difficult maneuvering to reach the site, no analysis of interchange design alternatives for existing and future uses, and to provide adequate circulation for the existing truckstop use.

Impact 3.12-11 of the original DEIR discusses supporting alternative transportation. The discussion is limited to bicycles. Alternative transportation must also consider transit and pedestrians. Congestion management practices may also be included to reduce vehicle trips, green house gas emissions, and air quality impacts.

Shasta County roadway improvement standards are required to be met. The EIR also should state that for freeway facility improvements, the project must address state and federal design standards. The regulatory setting discussion regarding federal regulations should indicate that freeway improvements will need to meet FHWA standards.

Furthermore, impacts to other I-5 interchanges and transportation facilities outside of the county jurisdiction are recognized in the PRDEIR; however, mitigation measures are not included that would address these impacts. The PRDEIR should be revised to incorporate mitigation for these impacts as appropriate.

**Disclosure of Public Facilities Impact Fees Ordinance Mitigation Fee calculations vs. CEQA Fair Share - Table 3.12-18 and Mitigation Measures 3.12-2a, 2b, 5a, 5b -** The table in the original DEIR previously identified the project's fair share percentage toward these improvements. This has been replaced with the project shall pay its Fair share fees toward these improvements in accordance with Shasta County Ordinance 665 Public Facilities Impact Fees. There is no disclosure of what the project's share is toward these improvements, no comparison of how the Impact Fee Program calculation would "cover" the project's share relative to CEQA fair share, or what the formula is for the Public Facilities Impact Fees Ordinance.

Mitigation Measure 3.12-5a references Figure 3-2. The measure should also reference Figure 3.12-20 which discloses the entire circulation system needed that includes the proposed truck driveway onto Pacheco Road.

**Project Phasing -** The DEIR presents confusion because only the full build out project is analyzed. The traffic analysis is inconsistent with the project description on DEIR page 2-1 that states that the project, "**(is) to be phased in accordance with market conditions and required improvement thresholds.**" The DEIR Traffic Section does not present thresholds for the number of trips, types of commercial uses, or commercial square footage trips that could be accommodated with the remaining capacity of the interchange. It also does not consider thresholds of commercial use trip generation that will result in exceeding the two-lane capacity of the existing facilities and does not identify capacity thresholds that can be considered based on interim improvements, such as intersection signalization, ramp metering, or road widening of local streets without replacement of the two-lane interchange overcrossing. If the development is proposed in a manner that immediately exceeds the capacity of the affected interchanges, the project should be fully responsible for constructing the improvements needed to accommodate the project.

**Ramp Metering -** Our December 23, 2009 letter requested ramp metering be considered to protect mainline Interstate 5 operations, but ramp metering is not mentioned in the report. Caltrans continues to request that ramp metering be assessed as a potential mitigation measure at the affected interchange ramps based on adopted District and Department policy.

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**January 31, 2011**

**Mainline LOS** - Tables 2 and 3, Freeway Mainline Operations (PRDEIR p. 1-9), footnotes that the LOS is computed using the HCS Software for the merge/diverge analysis consistent with HCM methodologies. Is the Mainline LOS determinations the LOS at the ramp junctions or have adjustments been made per Chapter 23 of the HCM to determine roadway segment LOS? Were volumes used from the Shasta County Travel Demand Model? Were adjustments made from the Demand Model and if so, what were they? This information is incomplete for CEQA purposes.

## ATTACHMENT 2

## Caltrans I-5 Improvement Plan Shasta County

### Introduction

In April 2009, the Shasta County Regional Transportation Planning Agency (SCRTPA) released the *Shasta County Regional Improvement Program (SCRIP) Nexus Study* to support impact fees on new development to fund transportation projects on Interstate 5 (I-5). Public hearings were held in the cities within Shasta County. The fees were approved by the City of Shasta Lake. Shasta County chose not to hold a public hearing to vote on implementation after the cities of Anderson and Redding chose not to approve the SCRIP fees. The Plan would only be implemented if all four jurisdictions approved the program.

The California Environmental Quality Act (CEQA) requires that transportation impacts from local development projects be identified and that significant impacts be mitigated, including impacts to the state highway system. Individual developments should contribute their "proportional share" of costs to mitigate the traffic impacts of their projects. The term "proportional share" means the percentage of mitigation costs attributable to a project as determined by the percentage of additional traffic a project will contribute to the state highway system.

The Caltrans I-5 Improvement Plan (Plan) is to serve as a starting point for discussion with local approving agencies, the developer, and Caltrans on what may be acceptable to mitigate I-5 traffic impacts. It is not intended to serve as the only traffic analysis required, nor as a comprehensive list of options that will meet the mitigation needs of a project. Specific mitigation projects and proportional share fees will be determined and negotiated with lead agencies on a case-by-case basis.

### Purpose of this Plan

The Plan will serve as a high level implementation document for improvements to I-5 within Shasta County that will meet the needs of the traveling public, mitigate development impacts, and accommodate future growth. The costs associated with the projects (Table 2) are planning level estimates only. Actual project costs would be determined when project specifics are more fully identified.

### Plan Area

The Caltrans I-5 Improvement Plan (Plan) begins at the Tehama / Shasta County line and extends north to the I-5 / State Route 151 overcrossing or postmiles 0.0 to 24.08, but is limited to the existing four-lane highway sections. The Plan includes only the I-5 mainline and does not include interchanges, ramps, or local roads.

### Need for Projects

The most recent Level of Service (LOS) and Traffic Volume data compiled by Caltrans for the I-5 Transportation Concept Report was based on the Shasta County Travel Demand Model, and was used in the Shasta County SCRIP Nexus Study. See Table 1 for specific freeway segment information. In 2005 the Peak Hour LOS on most I-5 freeway segments in Shasta County was B or C. It is forecast that if no I-5 improvements are made, the LOS for four-lane segments in Shasta County would reach F by 2030. The LOS

would be improved to LOS C or D in these same segments with the addition of a third through lane in each direction on I-5.

The Shasta County Travel Demand Model projects growth in Shasta County to occur at rates from 1 to 2 percent annually depending upon the type of development, with residential development estimated at 1.4 percent annually. The rates are forecasted through the 2030 year (Fix Five Partnership Impact Fee Nexus Study, page 2). It is acknowledged that these growth percentages have not been realized due to the current economic climate. However, it is still anticipated that projected growth will result in the same LOS figures presented in Table 1.

**Table 1: I-5 2005 and 2030 Level of Service and Traffic Volumes  
Shasta County**

Segment	Location	Postmile	Peak Hour Level of Service			Average Daily Volumes		Peak Hour Volumes	
			2005	2030 Un-improved	2030 Improved	2005	2030	2005	2030
7S	Shasta County border to 4th Street OC	0 - 0.9	C	F	C	42,000	84,000	5,300	6,700
8	4th Street OC to SR 273	0.9 - 3.6	D	F	C	52,000	94,000	6,400	7,400
9	SR 273 to Riverside Ave OC	3.6 - 6.7	C	F	C	52,000	93,000	5,700	7,500
10	Riverside Ave OC to S. Bonneyview OC	6.7 - 12.2	C	F	D	55,000	92,000	5,700	7,500
11	S Bonneyview OC to I-5/SR 44	12.2 - 15.6	C	F	D	62,000	103,000	6,500	8,300
12	I-5/SR 44 to SR 273 North	15.6 - 18.8	D	F	D	58,000	99,000	6,300	8,000
	North SR 273 to SR 151 OC	18.8 - 22.2	B	C	C	46,500	65,000	4,700	5,200
13	SR 151 to Mountain Gate OC	22.2 - 24.8	B	D	B	21,800	37,000	3,800	4,800

2030 Unimproved LOS assumes no improvements made to I-5.

2030 Improved assumes the addition of a third lane in each direction on I-5.

Sources: Caltrans, Willdan, MuniFinancial, SCRIP 2008

### Project Identification

Currently, most sections of I-5 within Shasta County are two lanes in each direction, with interchanges spaced throughout to provide access to the local road system. Caltrans traffic analysis, as published in the *June 2008 I-5 Transportation Concept Report*, indicates that traffic volumes will increase by the 2030 year so that the Level of Service in the four-lane sections will be reduced in the peak hour timeframes to LOS F.

If I-5 were expanded to three lanes in each direction, the 2030 year peak hour LOS would be C / D. Please see Table 2 for specific information on the project locations and planning-level costs.

Other transportation projects that should be analyzed include ramp metering (see District 2 Ramp Meter policy), merge/diverge analysis for ramp operation, and signal modifications at ramp termini. Additional transportation improvement projects not specifically mentioned here should also be considered to improve the short-term operation of the freeway and interchanges.

**Table 2: I-5 Improvement Project Costs (2007 dollars)  
Shasta County**

Segment	Location	Post - miles	Miles	Roadway		Structures		Total
				Construction	Support	Construction	Support	
7S	Shasta County border to 4 <sup>th</sup> Street OC	0 - 0.9	0.9	\$6,000,000	\$1,620,000	\$11,500,000	\$3,105,000	\$22,225,000
8	4 <sup>th</sup> Street OC to SR 273	0.9 - 3.6	2.7	Funded by RTIP/STIP/ITIP				
9	SR 273 to Riverside Ave OC	3.6 - 6.7	3.1	\$25,000,000	\$6,750,000	\$30,000,000	\$8,100,000	\$69,850,000
10	Riverside Ave OC to S. Bonneyview OC	6.7 - 12.2	5.5	\$30,000,000	\$8,100,000			\$38,100,000
11	S Bonneyview OC to I-5/SR 44 connect	12.2 - 15.6	3.4	Funded by RTIP/STIP/ITIP				
12	I-5/SR 44 to SR 273 North	15.6 - 18.8	3.2	\$20,000,000	\$5,400,000	\$7,000,000	\$1,890,000	\$34,290,000
	North SR 273 to SR 151 OC	18.8 - 22.2	3.4	Funded by RTIP/STIP/ITIP				
13	SR 151 to Mountain Gate OC	22.2 - 24.8	2.6	\$16,000,000	\$4,320,000	\$2,000,000	\$540,000	\$22,860,000
Total			18.7	\$122,000,000	\$32,940,000	\$60,500,000	\$16,335,000	\$187,325,000

Sources: Caltrans, Willdan, MuniFinancial

**Funding Plan**

The following are funding sources that may be used to fund I-5 improvements:

- The State Transportation Improvement Program (STIP) is a transportation improvement funding program that can be used for capacity-increasing state highway projects. The two STIP funding sources for highway projects are the Regional Transportation Improvement Program (RTIP)-and the Interregional Transportation Improvement Program (ITIP).
- **Regional Transportation Improvement Program (RTIP) funding for regional improvements is derived from the State Transportation Improvement Program (STIP). Seventy-five percent of the STIP funds go to the Regional Transportation Planning Agencies to set priorities for these funds.**

The agencies may prioritize I-5 improvements subject to approval by the California Transportation Commission (CTC).

The regional shares are anticipated to be between \$3.5 and \$5.5 million per year. Over 20 years, this equates to \$70-\$110 million. RTIP funds (excluding the ITIP funds) may be used for local street and road projects, as well as State highway projects. There will be other state highway system needs in the next 20 years. These fund estimates are optimistic and are likely to be the maximum funding levels that can be assumed. This Plan assumes that \$55 million of Regional Transportation Improvement Program funding may be used to build a third lane on I-5 (Table 3) over the next 20 years.

- **Interregional Transportation Improvement Program (ITIP)** is also funded from STIP, with Caltrans setting priorities and requires approval by the CTC. Twenty-five percent of the STIP funds are committed to the ITIP, which is dedicated to interregional State highway improvements. I-5 improvements would be eligible for funding from this source. However, statewide project needs far outweigh the availability of funding from this source. Historically, the CTC has prioritized funds to regions that have agreed to pay for a portion of a highway project with a local (non-state) funding source such as tax measure or impact fee funds. This Plan assumes that \$55 million of ITIP funding may be available to match the RTIP funding (Table 3) over the next 20 years.
- **State Highway Operation and Protection Plan (SHOPP)** funding is prioritized by Caltrans and approved by the CTC. SHOPP funds are for the maintenance and operation of the State highway system through rehabilitation, capital maintenance, safety, storm damage, and other programs. SHOPP funding cannot be used for capacity improvements.
- **Bond Funding** – Proposition 1B funds provided about \$19.1 billion from bond sales for transportation projects. The Cottonwood Hills Truck Climbing Lane and the South Redding 6-Lane projects, both on I-5, were funded through Proposition 1B. Proposition 1B funding is a one-time source of transportation funding, not an ongoing funding source. Additional bond funding cannot be relied upon in the near future.
- The U.S. Congress (Federal) may also provide future funding opportunities through earmarked legislation or other federal legislation that is not known at this time. Recent examples of unanticipated federal transportation funding opportunities include the American Recovery and Reinvestment Act (ARRA and TIGER funds).
- **Federal Transportation Reauthorization.** The previous federal transportation authorization bill expired on September 30, 2009 and is being extended for short periods of time. A new transportation bill is being formulated. It is not known at this time what the reauthorization bill will look like or what funding opportunities will be available.

- Local sales tax measures. Nineteen California counties, comprising 83% of the state's population, have imposed local sales tax measures (self-help counties) to help pay for local transportation projects. It is not anticipated that Shasta County will impose a local transportation sales tax in the near future.
- Local Development Funds are developer-paid funding to offset impacts caused by development projects. Table 13 on Page 49 of the *Shasta County Regional Improvement Program Impact Fee Nexus Study* showed the maximum attributable fee for new development to be \$2,190 per equivalent dwelling unit (EDU). This figure represents the average allowable fee attributable to new development based on the assumption all new development in the region would participate. Analysis of individual developments may yield a higher or lower figure depending on the development. The *Fix Five Partnership; Phase I Impact Fee Nexus Study* shows the same amount on page 50, Table 11. This amount is not proposed as a fee schedule, but only restates the amounts arrived at in previously completed proposed fee program nexus studies for the I-5 Corridor in Shasta County. The analysis was done on a regional level, not a project or location-specific level. Since this fee was not adopted, the assumptions in the two studies are not valid for specific project mitigation. Caltrans will work with the lead agency to determine project specific mitigation based on the mutually agreed project specific impact studies.

**Table 3: I-5 Improvements Anticipated Funding**

Cost of Projects in Shasta County		\$187,325,000
<b>Funding for additional lanes on I-5 in next 20 years:</b>		
STIP (RTIP/ITIP)	\$110,000,000	
Other Sources *	\$ 77,325,000	
<b>Total</b>	<b>\$187,325,000</b>	

\*Future bonds, federal earmarks, developer mitigation, etc.

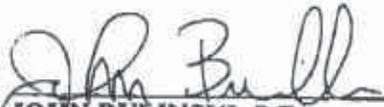
**Suggested Documents to Review**

- Caltrans District 2 Ramp Meter policy
- Caltrans Guide for the Preparation of Traffic Impact Studies
- Caltrans District 2 Origination & Destination Traffic Study (2007)
- Caltrans I-5 Transportation Concept Report
- draft 2010 Shasta County Regional Transportation Plan
- Shasta County Regional Transportation Improvement Program
- Fix 5 Nexus Study

**Sources of Information**

Sources of information for this Plan were obtained from the *2010 Shasta County Regional Transportation Plan, Shasta County Regional Improvement Program Nexus Study, Fix Five Partnership Phase I Impact Fee Nexus Study, and Caltrans I-5 Transportation Concept Report.*

Plan approved by:



**JOHN BULINSKI, P.E.**  
District Director

9/13/10

Date

## ATTACHMENT 3

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION  
OFFICE OF COMMUNITY PLANNING  
1657 RIVERSIDE DRIVE  
P. O. BOX 496073  
REDDING, CA 96049-6073  
PHONE (530) 229-0517  
FAX (530) 225-3020  
TTY (530) 225-2019



*Flex your power!  
Be energy efficient!*

December 24, 2009

Ms. Lisa Lozier  
Shasta County Department of Resource Management Planning Division  
1855 Placer Street  
Redding, CA 96001

IGR/CEQA Review  
Sha-5-9.77  
Knighton & Churn Creek Commons  
Retail Center (Hawkins)  
GPA 08-002, Z 08-003 DEIR  
SCH# 2009012088

Dear Ms. Lozier:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Knighton and Churn Creek Commons Retail Center. The project requests a General Plan amendment and zone amendment to consider a 740,000 square foot retail commercial and entertainment center in the northeast quadrant of the Interstate 5 (I-5)/ Knighton Road interchange.

The DEIR Appendix O contains 250 pages of technical data but is not well summarized in the Traffic Section of the DEIR. Adequate disclosure of the traffic analysis and micro-simulation computer model is critical since the project results in the addition of 24,801 daily weekday trips and 33,000 Saturday mid-day trips. Figure 3.12-4 identifies that 78% of the project traffic is expected to travel through the Knighton Road interchange and 76% will travel on I-5. The technical data is inadequate for Caltrans review of the impacts to the State's facilities.

In response to the Notice of Preparation (NOP), Caltrans requested an analysis of this regionally significant project's impacts on mainline I-5, including the project's impacts on the overall capacity of the existing 4-lane freeway. The document does include fair share percentages for some improvements to the merge/diverge areas of the ramps at the interchanges, but the supporting documentation for those calculations has not been included. Due to the amount of resultant trips from this project, a clear analysis of mainline I-5 impacts needs to be disclosed.

In the absence of the analysis and data identified in the attached comments, the DEIR fails to adequately disclose the supporting information for the conclusions presented. Recirculation of the DEIR is necessary to make a good faith effort to disclose to the public and decision makers the consequences of this project. It is also critical that the DEIR identify and implement feasible mitigation measures due to concerns with not only this project, but also other development contemplated within the I-5 corridor and the long-term operations of the State Highway system.

Caltrans will continue to offer the opportunity to work diligently with the County and the Shasta County Regional Transportation Planning Agency to obtain the mitigation measures needed to reduce the traffic impacts of this project and to identify alternative mitigation measures that may be considered to reduce the project's traffic impacts. We look forward to receiving and reviewing the responses to these comments in the recirculated draft EIR. If you have any questions, please do not hesitate to call me or my staff at (530) 229-0517.

Sincerely,

MICHELLE MILLETTE, Chief  
Office of Community Planning  
Caltrans District

Attachment

**ATTACHMENT**  
**KNIGHTON & CHURN CREEK COMMONS RETAIL CENTER (HAWKINS) DEIR**  
**CALTRANS DISTRICT 2 COMMENTS**  
**December 24, 2009**

### **Incomplete Traffic Data**

In response to the NOP, Caltrans requested analysis of this regionally significant project's impacts on mainline I-5, including the project's impacts on the overall capacity of the existing 4-lane freeway. The document does include fair share percentages for some improvements to the merge/diverge areas of the ramps at the interchanges, but the supporting documentation for those calculations has not been included.

Caltrans is particularly interested in the technical review of the traffic simulation and inputs (assumptions) used. In order to provide adequate disclosure and a method for verifying the impact analysis and proposed mitigation measures, we again requested this information in our letter dated November 19, 2009 but the entire electronic traffic simulation (both input and output) files have not been provided in order for Caltrans to run the simulation. These concerns are further described in the "Synchro Output Data and Disclosure of Micro-Simulation Data" section. Once the information is provided, we will also be verifying that the micro-simulation represents a full operational analysis between the project and the interchange and the resultant impacts to mainline I-5. In the absence of this information, the document fails to adequately disclose the supporting information for the conclusions presented.

The DEIR Traffic Section does not describe the mainline I-5 segment impacts, as requested in Caltrans' NOP response. However, Appendix O does include two tables showing the vehicles per lane density, changes to highway speeds, and Level of Service (LOS) in the Basic Freeway Segments Capacity Analysis for Cumulative No Project and Cumulative plus Project conditions. The Basic Freeway Segments Capacity Analysis needs to address Existing conditions, Existing plus Project, Cumulative conditions, and the Cumulative plus Project conditions. This information needs to be included in the Traffic Section of the DEIR.

Caltrans requests that the specific traffic volumes used and supporting calculations be provided for review to verify the proportionate shares presented in the DEIR and that the mainline segment impacts and mitigation measures be included in the Traffic Section of the DEIR for the benefit of the public and decision makers reading the document. The information presented in the DEIR is inadequate to disclose these concerns.

### **Direct Plus Project Impacts and Mitigation Measures**

As disclosed in Table 3.12-9 (DEIR p. 3.12-14) and Table 3.12-11b (DEIR p. 3.12-19), most of the transportation facilities, including the interchange, are currently operating with ample existing capacity. Approval of a General Plan amendment and the addition of this project to the two-lane interchange overcrossing results in a direct significant impact that degrades the Level of Service (LOS) and volume to capacity ratio (v/c) from LOS B and C at the Knighton Road ramp intersections (Table 3.12-4, DEIR page 3.12-6) to unacceptable LOS F and recommends widening of the road section between the ramps (which is the interchange overcrossing) to six lanes and signalization of the ramp intersections (Tables Table 3.12-11b, DEIR page 3.12-19; Table 3.12-9, DEIR page 3.12-14; and Table 3.12-11a, DEIR page 3.12-18). The DEIR fails to clearly identify that if additional lanes are needed, the overcrossing structure would require replacement.

### **Freeway Overcrossing Impacts**

Table 3.12-11b identifies that the roadway LOS on Knighton Road between the ramp intersections also goes from existing LOS A to LOS F with the project (Tables 3.12-9 and 3.12-11b, DEIR pp. 3.12-9 and 19). Table 3.12-11b further identifies that the mitigation necessary is to widen the roadway (overcrossing) to six (6) lanes, confirming that the capacity of the two-lane facility is exceeded with this project alone. However, Mitigation Measure 3.12-1a on page 3.12-15 recommends widening the overcrossing from two-lanes to four (4) lanes which conflicts with Table 3.12-11b that identifies six lanes. Interestingly, Figure 2-3, although conceptual, depicts a seven lane overcrossing. This internal inconsistency undermines the validity of the conclusions presented. The document should be revised to clearly determine what infrastructure improvements are needed.

It should also be noted that Caltrans cannot permit the existing overcrossing to be widened due to inadequate sight distance. In each case, the addition of the plus-project traffic alone requires that the overcrossing be replaced.

The DEIR in Section 3.12.3, page 3.12-13, presents confusion because only the full build out project is analyzed. The traffic analysis is inconsistent with the project description on DEIR page 2-1 that states that the project, "(is) to be phased in accordance with market conditions and required improvement thresholds." The DEIR Traffic Section does not present thresholds for the number of trips, types of commercial uses, or commercial square footages trips that could be accommodated with the remaining capacity of the interchange. It also does not consider thresholds of commercial use trip generation that will result in exceeding the two-lane capacity of the existing facilities and does not identify capacity thresholds that can be considered based on interim improvements, such as intersection signalization or road widening of local streets without replacement of the two-lane interchange overcrossing. If the development is proposed in a manner that immediately exceeds the capacity of the affected interchanges, the project should be fully responsible for constructing the improvements needed to accommodate the project.

The DEIR analysis figures need to be revised to reflect the conclusions reached in the traffic analysis. The figures need to accurately and consistently disclose the lane configurations necessary to meet the plus-project conditions, the cumulative plus project conditions, and since the project proposes a general plan amendment, the general plan buildout conditions.

The revised figures need to address the interchange footprint necessary to change the existing geometrics to reflect current design standards that may either expand the footprint of the interchange or may result in changes to the location of the ramp intersections to reflect the changes in approach slopes. Provisions for pedestrians and bicycles also need to be included.

### **General Plan Consistency**

The project proposes a General Plan amendment. The relevant circulation policies are listed in the DEIR pages 3.12-10 and 11. The policies include Policy C-61 that requires, in part, that where a project results in LOS E (or worse) on existing facilities the project shall either demonstrate all feasible methods of reducing travel demand or the provision of capacity improvements to the specific road link, the transit system, or any reasonable combination. Table 3.12-8 on DEIR page 3.12-10 discusses General Plan consistency with the policies but does not include Policy C-61.

As previously identified, Impact 3.12-2 and Table 3.12-10 identify that the addition of the project to the existing conditions will result in a direct significant impact to delay and unacceptable LOS. Policy C-61 is

identified in the impact threshold of significance discussion for roadway segments and intersections. The mitigation measures included in the DEIR should be adopted and implemented to find the project consistent with the General Plan. This would require that the project be responsible for mitigating the traffic impacts by constructing the transportation improvements necessary to accommodate the project traffic.

The resultant anticipated traffic congestion, expected long queues, waits through multiple signal cycles, and difficult maneuvering to reach the site should also be considered in concluding whether emergency access will be impeded at full buildout.

### **Synchro Output Data and Disclosure of Micro-Simulation Data**

DEIR page 3.12-6 discusses that the Synchro/SimTraffic micro-simulation software was used to evaluate the project site. However, without the inputs or the entire simulation, Caltrans is unable to verify the conclusions presented. The inputs and simulation are also critical to determine if the intersections were analyzed independently or analyzed and simulated together as a coordinated signal system. The difficulty in agreeing with the document's conclusions is demonstrated in the Queuing and Blocking Report in Appendix O. The report looks at the ramp intersections in the Cumulative plus Project PM conditions, but shows that a total of six lanes (three westbound and three eastbound) were analyzed for the I-5 Knighton northbound ramps but only four lanes (three westbound and one eastbound) for the southbound ramps.

Given the close proximity of the project access and adjacent intersections, a coordinated system analysis of all the intersections in the project vicinity is needed to determine the resulting impacts as queuing from one intersection will likely affect the operation of adjacent intersections. The impact discussion in the Transportation Section of the DEIR needs to disclose all of the intersections affected, the percentage of time that queues will exceed the vehicle lane storage length, and the number of signal cycles traffic will be delayed.

The location of the project access may have to be relocated to Churn Creek Road in order to provide for the safe and efficient operation of the I-5 ramps. From the limited analysis provided, it appears that traffic from the ramps will queue onto mainline I-5. Traffic queuing that results in stopped vehicles on an interstate mainline presents a significant safety concern.

It should be noted that as indicated on DEIR page 3.12-9, Caltrans considers the LOS C/D threshold as the threshold for significant impacts, per the Caltrans' "Guide for the Preparation of Traffic Impact Studies" (TIS Guide). Caltrans does not consider LOS E an acceptable level of service for its facilities. The DEIR should identify the state facility locations where the Caltrans threshold is exceeded. Caltrans considers these impacts to be significant direct impacts for Existing plus Project conditions and significant cumulative impacts in the Cumulative plus Project conditions. Section 3.12 of the DEIR does not accurately represent this for Caltrans facilities.

The Synchro output data in Appendix O shows the assumed amount of heavy vehicles using the I-5 Knighton northbound ramps as 2% to 6% of the total traffic (Appendix O, Synchro 6 Report, page 10). This assumption needs to be explained as it appears low given the adjacent truck stop/fueling facility. Other output sheets do not indicate what percentage of heavy vehicles are assumed which further emphasizes the need for complete disclosure of the input assumptions and micro-simulation files needed to assess the conclusions presented.

Impact 3.12-3 identifies a significant direct impact at the Cypress Avenue/I-5 northbound merge. Since this significant direct impact is a result of adding the project traffic to the existing conditions, mitigation should be the responsibility of this project. Mitigation Measure 3.12-3 requires the addition of a third northbound

travel lane to I-5. The DEIR should disclose the length of the third lane needed to mitigate this significant direct project impact. Similarly, the DEIR should disclose the length of the third lane needed for those mitigation measures affecting the I-5 merge and diverge areas of the affected interchanges. Ramp metering should be assessed as another potential mitigation measure at the affected interchange ramps.

### **FHWA Approval of Interchange Modifications**

As noted in our NOP response, modifications to the interchange will require Federal Highway Administration (FHWA) approval. The DEIR lacks any discussion of alternative interchange designs. The County and the developer are advised that at the time an encroachment permit is applied for, the applicants may be required to analyze alternative interchange designs. The expanded analysis may result in improvements that differ from the proposed mitigation measures in the DEIR. It should be noted that Caltrans and FHWA are the lead agencies for projects within the interstate right of way. Therefore, the applicant will be required to prepare environmental documentation acceptable to FHWA and Caltrans for those projects.

Mitigation Measure 3.12-7 addresses Shasta County roadway improvement standards (DEIR, page 3.12-40). The measure should either be amended or a new measure added to state that for freeway facility improvements, the project will need to address state and federal design standards. The regulatory setting discussion on DEIR page 3.12-9 regarding federal regulations should indicate that freeway improvements will need to meet FHWA standards.

### **Cumulative Plus Project Impacts and Mitigation Measures**

The DEIR on page 3.12-26 finds the mitigation measures for cumulative plus project conditions to be significant and unavoidable. It also questions the funding and jurisdiction controls for implementing mitigation measures. In regards to utilizing the Shasta County Regional Improvement Program Impact Fee Nexus Study (SCRIP), the DEIR does not make any recommendations that the County adopt the program to address the mitigation measures. The DEIR references the study as an adequate basis for determining proportionate share mitigation. In the absence of an adopted mitigation fee program for the state highway facilities, the DEIR must determine the project's proportionate share impacts and mitigation measures based on the project traffic and the changes to the buildout conditions for the General Plan amendment.

### **Feasible Mitigation Measures**

CEQA prohibits public agencies from approving projects that will have significant effects on the environment unless certain findings are made. The agency must find – for each significant effect – that mitigation measures or alternatives have either been adopted by the agency, should and can be adopted by another agency with exclusive responsibility and jurisdiction over the affected resource, or that the mitigation or alternatives are infeasible. Additionally, in order to approve a project that will have significant but unavoidable effect, overriding economic, legal, social, technological, or other benefits of the project must be found to outweigh the significant effects.

The DEIR cites the fact that the freeways are not under the precise jurisdiction of the County as supporting rationale for a finding of "significant but unavoidable" impact and provides no analysis of overriding considerations. The findings are inadequate under CEQA. The DEIR must adopt the mitigation measures or explain why they are not feasible and make findings of overriding considerations. Offsite mitigation or proportionate share contributions have consistently been upheld as appropriate methods of mitigation. Since the Department has the procedural mechanisms in place to allow other agencies to construct projects on the State Highway System, the measures are feasible.

Caltrans strives to work in partnership with the local agencies (cities and counties) to mutually agree on the appropriate transportation project(s) to mitigate the impacts of development on the state highway system. Many local agencies and private developers fund and build state highway improvement projects, either through the encroachment permit process, or if the project is more complex, through the Caltrans Planning Division's Oversight Project Manager. One current and local example is the City of Anderson's installation of a traffic signal on State Route (SR) 273 at Alexander Avenue. Even though Caltrans is the owner-operator of the state highway system, local agencies are not prohibited from funding or building state highway projects.

The statement in the DEIR that the County cannot build the improvements or be certain that the improvements will be built because it is not in their jurisdiction or funding has not been fully guaranteed is inaccurate and should be revised. The forefront issue should be whether there is an obligation to mitigate the project's impacts per CEQA, which the document recognizes, and to correctly identify that there are methods to insure and monitor their construction through conditions of approval, development agreements, and cooperative agreements. The recommended mitigation measures that include the requirements of other agencies, such as Caltrans, the California Department of Fish and Game, the Regional Water Quality Control Board, or the US Army Corps of Engineers, are feasible and are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the County consistent with Section 15126.4 of the CEQA Guidelines.

To this end, it is further requested that the transportation mitigation be negotiated between the County and Caltrans. The desired results of the negotiated traffic mitigation would be that the project applicants/developer(s) shall contribute a proportionate share amount for all needed improvements, both within the County jurisdiction and outside the County jurisdiction. The proportionate share calculations shall also be verified in consultation with Caltrans. Where the impacts are located within the City of Anderson, or the City of Redding, those jurisdictions shall agree on proportionate share mitigation. The proportionate share funds shall be held by Shasta County. As the freeway and interchange improvements identified in the EIR are proposed, designed, and planned for construction by the developer with oversight by the responsible agency, the County will offer the developer's contribution to the appropriate agency. If the identified improvements are not constructed, or if findings are not made to demonstrate the improvements will be made, the County, in cooperation with Caltrans, may agree to redirect the developer's fund contributions to other improvements within Shasta County required to mitigate the project's impacts. This mechanism will ensure that the collected mitigation funds will be spent on the measures identified in the EIR or on alternative improvements that will reduce the project's transportation impacts.

Alternatively, the project proponent can fund and build the entire mitigation, and get reimbursed when other development contributes to the funding of the mitigation improvement project.

The DEIR raises concerns about the lack of a guaranteed funding source or program for the projects needed to address the significant cumulative impacts. Available funding sources include local development fees, state and federal gas taxes (RTIP), and impact fee programs, such as the County's Public Facilities Improvement Program. The County's Public Facilities Improvement Program collects impact fees toward improving the Knighton Road interchange. The interchange improvement needs are also included in the Shasta County RTP, but are not currently prioritized for construction. The priority for improving the Knighton Road interchange has not been needed because, until this project was proposed, there has been adequate remaining capacity for existing development. However, the RTP can be amended to raise the project funding priority of these improvements.

### **Project Alternatives**

DEIR Chapter 4 discusses the project alternatives including a Reduce Size Alternative. The discussion identifies that the Reduce Size Alternative would result in fewer vehicle trips and lower impacts to the interchange and roadway segments. It concludes that the alternative would have the same potential for vehicle conflicts and would require mitigation similar to that of the proposed project. The analysis provides no quantification to support this conclusion. Therefore, we look forward to the revised traffic analysis incorporating project phasing consistent with the project description to quantify and support the conclusion made regarding impacts and mitigation measures applicable to a reduced size alternative.

### **Storm Water Runoff**

The discussion of Impact 3.8-5 indicates that the project will not cause an increase in the amount of storm water runoff or result in flooding on- or off-site (DEIR, page 3.8-15). Mitigation Measure 3.8-2 discusses that Best Management Practices will be utilized to reduce the potential impacts on water quality from storm water runoff and from affecting the base flood elevation that may impact I-5. Caltrans requests that prior to the issuance of building permits, a copy of the final drainage report be provided to verify the conclusions presented.

No net increase to the 100-year storm event peak discharge or increase in elevation into the State's highway right of way or Caltrans' drainage facilities may occur as a result of this project. Further, the developer must maintain or improve existing drainage patterns and facilities affected by this project to the satisfaction of the State and Caltrans. The DEIR indicates that this will be accomplished through the implementation of storm water management best management practices including detention/retention ponds or basins, sub-surface galleries, on-site storage or infiltration ditches, as appropriate. Once installed, the property owner must properly maintain these systems. The developer/owner may be held liable for future damages due to impacts for which adequate mitigation was not undertaken or maintained. All surface water runoff that is discharged to the State's highway right of way and Caltrans' highway drainage facilities must meet Central Valley Regional Water Quality Control Board clean water standards prior to discharge. The cumulative effects on drainage due to development within this area should be considered in the overall development plan of the area. Any work within the State right of way, including modifications to existing drainage facilities, will require a Caltrans encroachment permit. For more information regarding encroachment permit fees or the encroachment permit process, the applicant may contact the District 2 Permits Office located at 1000 Center Street in Redding. The telephone number is (530) 225-3400.

## ATTACHMENT 4

California Department of Transportation

*Flex your power!  
Be energy efficient***District Directive**

Number: DP-09

Effective Date: April 18, 2008

**TITLE** Freeway Ramp Meter Implementation**POLICY**

Deputy Directive No. 35, dated January 3, 1995, details Caltrans' policy and responsibilities with regard to ramp metering. As stated in the directive, ramp metering is considered to be the common method of ramp entry control and is an effective tool in reducing congestion on California's freeways. Another benefit of ramp metering is the elimination of platoons of traffic entering the system, which can reduce collisions.

Within the next 10 to 15 years, freeway segments in District 2 are expected to reach undesirable levels of peak hour congestion. During these peak periods, controlling the flow of traffic entering the system will likely be needed to improve the efficiency of the corridor. Therefore, it is important that ramp metering be considered on all freeway and interchange projects, especially those affecting freeway entrance ramps.

During the planning and project development process for freeway or interchange projects in District 2, four "levels" of ramp meter implementation should be considered. These implementation levels should also be considered as mitigation for local development projects. The levels are defined by the projected peak hour density of the mainline segment downstream from the ramp merge 10 years after construction of the project. The ramp meter design for any of the levels below shall be for a 20-year design life, as required in the Ramp Meter Design Manual, unless otherwise specified by the District Traffic Engineering and Operations Office. The criteria for District 2 will be as follows:

	Projected 10-yr. Peak Hour Density on Through Traffic Lanes (pc/ml/in)	Ramp Meter Implementation
LEVEL 1	18 or less	None
LEVEL 2	>18 - 26	R/W only
LEVEL 3	>26 - 35	R/W, earthwork, and below ground infrastructure *
LEVEL 4	>35	R/W and fully functional ramp meter *

\* With concurrence from the Traffic Engineering & Operations Office, ramp meter implementation may not be necessary, or may be deferred, if the projected 10-yr. entrance ramp volume is less than 240 vph.

District 2 Directive  
Number DP-09  
Page 2

### ***INTENDED RESULTS***

The intent of this policy is to provide a consistent method for identifying future ramp meter needs and incorporating them into freeway/interchange projects. Ramp meter funding is not addressed as part of this policy, as there are many variables that can influence how a project is programmed, including development fees and/or cost sharing between agencies. Therefore, ramp meter funding will be determined on a case-by-case basis. Employing a system wide approach, the District will maintain a Ramp Meter Development Plan (RMDP). The RMDP identifies where ramp meters are expected to be necessary (i.e. Level 4) within the next ten years. It is noted that significant area development may create a need for ramp metering that was not anticipated in the RMDP.

### ***RESPONSIBILITIES***

#### **Office of Community & Regional Planning:**

- Promote the concept of ramp metering as an effective traffic management strategy during regular meetings with District's Regional Transportation Planning Agencies.
- Organize and facilitate meetings between Traffic Engineering & Operations Office and local partners to develop support for ramp metering.
- Request and confirm that ramp metering implementation levels are incorporated into Traffic Impact Studies as mitigation for local development projects.
- Advocate that local agencies collect fair share fees (for ramp metering) as mitigation from development projects that cumulatively impact freeway interchanges.

#### **Office of System Planning:**

- Forecast freeway densities and ramp volumes for determining level of ramp meter implementation.
- Confirm projected freeway densities and ramp volumes when provided by a consultant.
- Support Traffic Engineering & Operations Office in the preparation of the District RMDP.

#### **Traffic Engineering & Operations Office:**

- Ensure the level of ramp meter implementation is appropriate from a system wide perspective and is consistent with the RMDP.
- Ensure compliance with the Ramp Meter Design Guidelines.

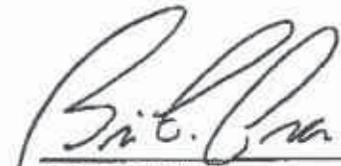
*"Caltrans improves mobility across California"*

District 2 Directive  
Number DP-09  
Page 3

- Prepare the District RMDP.
- Market the benefits of ramp metering to local agencies.
- Operate ramp meters.

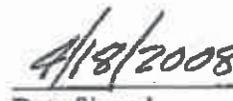
**APPLICABILITY**

All Caltrans District 2 Management and employees.



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BRIAN CRANE  
District Director



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Date Signed

## ATTACHMENT 5

California Department of Transportation

*Flex your power!  
Be energy efficient!**Deputy Directive*

Number: DD-35-R1

Refer to  
Director's Policy: 08-Freeway System  
Management

Effective Date: January 6, 2011

Supersedes: DD-35 (1-3-95)

*TITLE* Ramp Metering*POLICY*

The California Department of Transportation (Department) is committed to using ramp metering as an effective traffic management strategy to maintain an efficient freeway system, and protect the investment made in constructing freeways by keeping them operating at or near capacity.

Each district that currently operates, or expects to operate, ramp meters within the next ten years, shall prepare a Ramp Metering Development Plan (RMDP). RMDP shall contain a list of each ramp meter location that is currently in operation or planned for operation within the next ten years. Each district shall update its RMDP biennially and ensure that future ramp meter locations are included in the local Congestion Management Plans.

Provisions for ramp metering shall be included in any project that proposes additional capacity, modification of an existing interchange, or construction of a new interchange, within the freeway corridors identified in the RMDP, regardless of funding source. These provisions, at each onramp, may include procurement of additional right of way, changes to ramp geometry to accommodate queue storage, installation of High Occupancy Vehicle (HOV) preferential lanes, deployment of electrical and communication systems, and construction of California Highway Patrol (CHP) enforcement areas and maintenance vehicle pullouts.

The guidelines, policies and procedures, and standards contained in the Ramp Metering Design Manual (RMDM), together with the design criteria in the Highway Design Manual (HDM), shall be applied when planning and designing ramp meters.

HOV preferential lanes shall be provided wherever ramp meters are installed, and each HOV preferential lane should be metered. Each district shall provide justification for deviation from the HOV preferential lane installation policy and obtain concurrence from the Headquarters Traffic Operations District Liaison.

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### ***DEFINITION/BACKGROUND***

Ramp metering is a traffic management strategy that utilizes a system of traffic signals at freeway entrance, and connector ramps to regulate the volume of traffic entering a freeway corridor in order to maximize the efficiency of the freeway, and thereby minimize the total delay in the transportation corridor.

Ramp metering has been an effective tool in reducing congestion and overall travel time on California freeways and local streets since the late 1960s. The added benefits include the reduction of both congestion-related collisions and air pollution.

The Department has installed over 2,200 ramp meters throughout the State. Installation of ramp meters on all urban freeway entrance ramps, including freeway-to-freeway connectors will be considered as a Departmental best practice, where ramp metering will maintain or improve effective operations along freeway corridors.

RMDM is a comprehensive document containing ramp meter design standards, design procedural requirements, and operational policies adopted statewide. RMDM is used to guide the Department's designers, as well as consulting engineers, and city/county engineers performing design work on freeways.

### ***RESPONSIBILITIES***

#### **Chief, Division of Traffic Operations:**

- Develops, implements, and maintains statewide policies, manuals, and guidelines for ramp metering.
- Provides direction and assistance to district staff on ramp metering activities, as well as resources for training district staff.
- Ensures and supports the inclusion of ramp meters in projects within freeway segments containing any of the locations listed in RMDP.
- Ensures consistency among different districts on the development and implementation of ramp metering projects.
- Provides direction, training and assistance to district Traffic Operations staff on the development of the RMDP in partnership with the Division of Transportation Planning.
- Leads the development of statewide RMDP.
- Maintains a statewide inventory of planned, programmed, and constructed ramp meters.

#### **Chief, Division of Transportation Planning:**

- Works collaboratively with Chief, Division of Traffic Operations in the development of statewide RMDP.

*"Caltrans improves mobility across California"*

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- Ensures consistency among different districts on the development of their respective RMDP.
- Provides direction, training, and assistance to district Planning staff on the development of the RMDP in partnership with the Division of Traffic Operations.
- Work collaboratively with the Division of Traffic Operations in the development, implementation, and maintenance of statewide policies, manuals, and guidelines for ramp metering.

Chiefs, Divisions of Design and Construction:

- Ensure that Division policies and manuals support the current ramp metering policies. These policies include making provisions for ramp meters in project development, accommodating HOV at onramps, and construction of CHP enforcement areas and maintenance vehicle pullouts at ramp meters.
- Ensure that staff and practices support ramp metering policies.

Chief, Divisions of Maintenance:

- Leads the development of acceptance procedures to hand-off ramp meter systems to the Division of Maintenance.

District Directors:

- Ensure the provision of resources for the entire life cycle of ramp metering activities. These activities include ramp metering planning, design, construction, operations, and maintenance.
- Establish local agency support for ramp metering.
- Assign lead responsibility for development, maintenance, and implementation of RMDP in the District.

Deputy District Directors, Planning:

- In coordination with District Traffic Operations, develop and maintain the district RMDP, program funding and implement ramp metering projects with the affected local and regional transportation stakeholders.
- Submits all future ramp metering locations contained in the RMDP for inclusion in local Congestion Management Plans, Regional Transportation Plans, Department System Planning documents and other applicable planning documents developed by other agencies or the Department.
- Ensures consistency of ramp metering plans with neighboring Districts' ramp metering plans.
- Provides traffic forecasting for development of RMDP in coordination with Traffic Operations.

Deputy District Directors, Construction, Design, and Project Management:

- Ensure that provisions for ramp metering are included in all projects involving interchange modification and freeway improvements at locations identified in RMDP.

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Page 4

- Ensure that each existing ramp meter affected by construction projects remains operational throughout the construction period.

Deputy District Directors, Operations:

- In coordination with District Planning, develop and maintain the district RMDP.
- Develop an inventory of planned, programmed and constructed ramp meters.
- Assist Deputy District Directors, Planning to coordinate with local and regional transportation stakeholders, on the implementation of ramp metering projects and document the efforts made toward coordination and record any concurrence obtained.
- Provide district personnel with technical assistance and support on the design and operation of ramp metering systems.
- Coordinate with CHP regarding enforcement issues at ramp meters.
- Implement ramp metering policies and procedures.
- Provide justification for deviation from established ramp metering policies. Ensure consistency of ramp metering practices with neighboring Districts.

Deputy District Directors, Maintenance:

- Ensure that each ramp meter is operational.
- Ensure regular inspection of each ramp meter.
- Ensure the minimization of traffic delay when repairing existing ramp meters.

District Project Managers:

- Ensure that ramp meters are included in the earliest stage of project development and are not eliminated during the project delivery process.
- Identify necessary project resources for the installation of ramp meters.
- Work closely with district Traffic Operations to ensure that ramp metering requirements are satisfied.
- Ensure the approval of Fact Sheet for exception to ramp metering policies.

District Ramp Metering Staff:

- Support the development and maintenance of the district RMDP.
- Review ramp metering plans and specifications, and coordinate with Design, Construction and Maintenance to design, construct, operate, and maintain ramp meters.
- Work with District Construction to ensure that each existing ramp meter affected by construction projects remains operational throughout the construction period.
- Prepare, review, and implement ramp metering rates that will maintain effective operations along freeway corridors.

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District Design Engineers and Office Engineers:

- In coordination with district Traffic Operations, identify and incorporate the need for ramp meters and HOV preferential lanes in the Project Study Report, Project Report, and Environmental Documents.
- Provide Standard Special Provisions and Contract Plans for ramp metering elements, including system integration needs such as communications, and compatibility of software.
- Provide Fact Sheet for exception to ramp metering policies.

District Construction Engineers (Electrical and Civil), Resident Engineers, and Encroachment Permit Inspectors:

- Ensure that ramp metering elements are installed according to the Standard Special Provisions, Standard Specifications, and Contract Plans.
- Ensure that each ramp meter affected by construction projects remains operational throughout the construction period unless otherwise specified in the contract documents.
- Immediately notify district Traffic Operations personnel of any change in status of each ramp meter affected by construction projects.
- Ensure that each ramp meter affected is fully reviewed, tested, and operational prior to accepting a contract and closing the project ID number.

**APPLICABILITY**

All Department employees involved with ramp metering activities.

Original Signed by:

January 6, 2011

\_\_\_\_\_  
MALCOLM DOUGHERTY  
Chief Deputy Director, Interim

\_\_\_\_\_  
Date Signed

### **3.2 Responses to Partially Recirculated DEIR Comments**

#### **Letter 85 Scott Morgan, Acting Director, State Clearinghouse, Governor's Office of Planning and Research**

**Response 85A:** The comment of the Governor's Office of Planning and Research confirming compliance with State Clearinghouse review requirements for draft environmental documents, and forwarding comments from responsible State agencies, is noted.

The only State agency offering comments was the Department of Transportation, Office of Community Planning (Letter 85.1). Response to that agency's comments are provided in the next subsection of this section of the Final EIR.

DEPARTMENT OF TRANSPORTATION  
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COUNTY OF SHASTA  
PERMIT DIVISION



*Flex your power!  
Be energy efficient!*

January 31, 2011

Ms. Lisa Lozier  
Shasta County Dept of Resource Management  
Planning Division  
1855 Placer Street  
Redding, CA 96001

IGR/CEQA Review  
Sha-5-9.77  
Knighton & Churn Creek Commons  
GPA 08-002, Z 08-003  
Partially Recirculated DEIR  
SCH# 2009012088

Dear Ms. Lozier:

Thank you for the opportunity to review the Partially Recirculated Draft Environmental Impact Report (PRDEIR) for the Knighton and Churn Creek Commons Retail Center. This comment letter serves to supplement our original concerns. Comments relating to the revisions are described below and in the attachment.

The Draft Environmental Impact Report (DEIR) and PRDEIR, as disclosure documents, must demonstrate that the conclusions presented can be verified by all who desire to review the document including agencies, citizens, adjoining businesses, and decision-makers. As we previously commented, this is critical since 76% of the project traffic will travel on Interstate 5 (I-5). We have numerous concerns with the DEIR analysis and conclusions including: incomplete data, unacceptable trip reductions, inadequate spacing of the project access driveway from the interchange ramps, resultant anticipated traffic congestion, unsafe queuing of the northbound ramps, difficult maneuvering to reach the site, expected long queues, waits through multiple signal cycles, and inadequate study of interchange design alternatives for existing and future uses. We request that project impacts be adequately addressed and commitment to appropriate mitigation be provided prior to certification of the project Environmental Impact Report (EIR) as required by the California Environmental Quality Act (CEQA).

A

As a Responsible Agency, Caltrans does not accept the DEIR or Traffic Impact Study (TIS) conclusions and cannot make the type of findings necessary for project approval to issue an encroachment permit or allow modifications to the interchange overcrossing and ramps. Caltrans does not recognize this document as adequately identifying and mitigating project impacts to State highway facilities.

B

A Project Study Report (PSR) and encroachment permit will be required to modify the interchange. In order for Caltrans to approve the PSR and encroachment permit, Caltrans will require that a traffic

C

Knighton & Churn Creek Commons  
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Partially Recirculated DEIR  
SCH# 2009012088  
January 31, 2011  
Page 2

analysis be provided that satisfactorily addresses the interchange and mainline I-5 operations for the proposed use and future use. Failure of the EIR and TIS to satisfy Caltrans and the Federal Highway Administration (FHWA) may severely delay construction of the improvements to the State highway facilities.

C cont.

We will continue to work in partnership with the County and the Shasta County Regional Transportation Planning Agency to mitigate traffic impacts of this project. We look forward to receiving and reviewing the responses to our original comments and these supplemental comments. If you have any questions, please do not hesitate to call me at (530) 229-0517.

Sincerely,



MICHELLE MILLETTE, Chief  
Office of Community Planning  
Caltrans District 2

#### Attachments

1. Attachment 1 – Supplemental Comments
2. Attachment 2 – Caltrans I-5 Improvement Plan, Shasta County
3. Attachment 3 – Caltrans Comment Letter dated December 24, 2009
4. Attachment 4 – District 2 Ramp Meter Policy
5. Attachment 5 – Department Ramp Meter Policy

**ATTACHMENT 1**  
**KNIGHTON & CHURN CREEK COMMONS RETAIL CENTER (HAWKINS) PRDEIR**  
**CALTRANS DISTRICT 2 SUPPLEMENTAL COMMENTS**  
**January 31, 2011**

**Feasibility of Mitigation Measures** - As stated in our original comment letter, the forefront issue should be whether there is an obligation to mitigate the project's impacts and to correctly identify that there are methods to insure and monitor their construction through conditions of approval, development agreements, and cooperative agreements. Caltrans requests that the DEIR commit to the appropriate mitigation measures for transportation impacts.

D

**Traffic Impact Study** - The PRDEIR contains substantial changes to the traffic impact study (TIS). The primary changes are the analysis of the circulation plan on the surrounding intersections and the inclusion of the impacts and mitigation measures for mainline I-5.

E

During our review we requested all of the technical background traffic study information necessary to replicate, to a reasonable degree, the conclusions reached in the DEIR and PRDEIR. This information is necessary to conduct a complete and thorough analysis of the modified TIS. However, even after a Freedom of Information Act request, only a portion of the technical information was provided. Absent provision of the complete model data including all inputs, outputs, and assumptions, we cannot validate the conclusions and therefore cannot agree that the revised TIS is valid for this project.

F

The PRDEIR identifies mitigation for the traffic impacts. However, the PRDEIR concludes that the impacts that are outside the County's jurisdiction are significant and unavoidable. The PRDEIR also concludes that the mitigation measures are considered infeasible and will not occur because a guaranteed funding source for the identified improvements has not been identified, or secured. As the owner and operator of the State highway system, we disagree that there is not a guaranteed funding source identified or secured for mitigation improvements, particularly with respect to I-5 mainline. There are several existing traffic improvement plans and programs prepared by the cities and Caltrans that include guaranteed and secured funding sources. This includes the "Caltrans I-5 Improvement Plan, Shasta County" which identifies I-5 improvement needs and funding sources. A copy is attached and can also be obtained from the Caltrans District 2 Website at <http://www.dot.ca.gov/dist2/planning/conceptrpts.htm>. Our analysis shows that most of the project mitigation determined infeasible is identified within one or more of these plans and funding programs. In fact, certain mitigation improvements identified in the PRDEIR will be constructed this year from secure, dedicated funding sources.

G

**Trip Generation Reductions** - Caltrans has reviewed the internalization (internal capture rate) and diverted link methods presented in the PRDEIR. We disagree that the project qualifies for discounting the trips for the following reasons. The Caltrans Traffic Impact Study Guide considers that a 5% reduction for internal capture is typical, but only when there is a "development pattern of at least 15% of floor area devoted to commercial uses oriented toward use by residences." This is similarly described on page 124 of the ITE Handbook, 2nd Edition, June 2004. The PRDEIR contains no justification for a 24% trip reduction for "internalization" or internal capture. Applying ITE Handbook 2nd Edition Figures 7.1 and 7.2 and Tables 7.1 and 7.2 will clarify the project proposes no office and no residential land use. Caltrans requests that the consultant include the ITE calculation sheets to justify the internalization per these figures and tables, as well as, Figure 7.4, Chapter 7 page 97 Trip Generation Handbook, 2<sup>nd</sup> Edition. Without the County presenting justification or consultation to agree on a reasonable potential discount of trips, a discount is not applicable.

H

Caltrans disagrees with the diverted link trip reduction presented in the PRDEIR. The "diverted link" trips assumption reduces the project trips by 22%. We agree that diverted link trips can be considered for impacts to mainline I-5. "Diverted Link" trips, trips that are using I-5, go to the project, and get back on I-5

I

**ATTACHMENT 1**  
**KNIGHTON & CHURN CREEK COMMONS RETAIL CENTER (HAWKINS) PRDEIR**  
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continuing in the same direction of travel, must be counted at the project driveway. Page 29 ITE Handbook advises, "Diverted linked trips add traffic to streets adjacent to a site, but MAY not add traffic to the area's major travel routes." The project trips still occur at the affected intersections, including the interchange ramp intersections and the project driveway. The study inaccurately reduces the project trips for internal capture and diverted link trips by 46%.

I cont.

**Level of Significance Threshold** - PRDEIR page 3.12-10 correctly states that, Caltrans endeavors to maintain a minimum target LOS at the transition between LOS C and D on State Highway facilities as stated in the Caltrans Traffic Impact Study Guide. Caltrans does not consider LOS E an acceptable level of service for State facilities which include ramp intersections. The DEIR should identify the state facility locations where the Caltrans threshold is exceeded. Where the LOS threshold is exceeded in the existing condition, CEQA provides for mitigating to the existing conditions. Caltrans considers these impacts to be significant direct impacts for Existing Plus Project Conditions and significant cumulative impacts in the Cumulative Plus Project Conditions. Section 3.12 of the PRDEIR does not accurately represent these impacts to Caltrans' facilities.

J

**Interchange Concerns** – Our review of the information in Table 3.12-10, finds that the project traffic would severely exceed the capacity of the northbound ramps because the SimTraffic LOS reports indicate a very low percentage of volumes served compared to the demand volumes. The project would also exhaust the capacity of the southbound ramps. The project trips, as estimated in the report, will create an unsafe condition with vehicles expected to queue on the northbound off ramp 100 feet upstream of the exit nose, using the procedure from Caltrans *Highway Design Manual* Figure 504.2B "Deceleration Length" and Index 405.2(2)(e) "Storage Length." For these reasons, location of the project access may have to be relocated to Churn Creek Road in order to provide for the safe and efficient operation of the I-5 ramps. When the actual area conditions are considered, the analysis provided shows that traffic from the ramps will queue onto mainline I-5. Traffic queuing that results in stopped vehicles on an interstate mainline presents a significant safety concern as well as a significant project impact.

K

Figure 3.12-19 does not show a complete queuing analysis of all roadway intersections subject to analysis in this study.

L

The revised figures must address the interchange footprint necessary to change the existing geometrics to reflect current design standards. The changes in approach slopes must be considered. As stated in the original DEIR provisions for pedestrians and bicycles also need to be included. The proposed alignment of the northbound offramp affects Caltrans ability to maintain a spread diamond interchange. This further raises the concern that the project driveway be relocated to Churn Creek Road or limited to right-in and right-out movements with a center median barrier on Knighton Road to maintain the current intersection spacing from the interchange ramps. This measure would affect the truckstop circulation as described in the PRDEIR. The resultant anticipated traffic congestion, expected long queues, waits through multiple signal cycles, and difficult maneuvering to reach the site should also be considered in concluding whether emergency access will be impeded at full buildout.

M

Section 3.12.3 Impacts and Mitigation Measures discusses that the impacts attributable to the project are based on full project buildout. It also states that previous studies have considered the improvements needed,

N

**ATTACHMENT 1**  
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“at least in part,” in studies completed by Shasta County prior to and independent of the current development proposal to rely on funding anticipated to be generated from the Public Facilities Impact Fees. The PRDEIR does not disclose whether the Knighton Road interchange improvements are based on the Shasta County Interchange Improvement Study or other studies. The Shasta County Interchange Improvement Study considers several design concepts with a 4- or 5-lane overcrossing. Several of those design concepts maintain the spread diamond interchange footprint. Therefore, Caltrans will preserve the spread diamond footprint until adequate study of the alternatives is presented to address the ultimate needs for the interchange. This project requires a 6-lane overcrossing. There is no discussion in the PRDEIR whether the Public Facilities Impact Fee program will be amended to prepare for the increased unanticipated costs to build a larger interchange than predicted in existing studies or whether the project would be responsible for funding the increased capacity needed to accommodate this project.

N cont.

As noted in our NOP response and our original DEIR comments, modifications to the interchange will require Federal Highway Administration (FHWA) approval. The DEIR and PRDEIR lack any discussion of alternative interchange designs. The County and the developer are advised that at the time of application for an encroachment permit the applicants may be required to analyze alternative interchange designs. The expanded analysis may result in improvements that differ from the proposed mitigation measures in the DEIR and PRDEIR. It should be noted that Caltrans and FHWA are the lead agencies for projects within the interstate right of way. Therefore, the applicant will be required to prepare environmental documentation and traffic analysis acceptable to FHWA and Caltrans for those projects.

O

Impact 3.12-8 of the PRDEIR discusses that 40 pm peak hour truck trips are expected to occur at the Pacheco Road intersection due to truckstop traffic. However, Appendix D, at page 7 states, “[a]s shown in Figure 4, the existing TA driveways serve approximately 100 trucks (in and out) and 185 autos (in and out) during the weekday p.m. peak hour. Appendix A includes the traffic count data.” In fact, Figure 4 does not differentiate cars and trucks. Appendix D includes an Appendix A that indicates a consultant counted vehicles, noting whether auto or “heavy truck,” entering and leaving several of the truck travel center’s driveways, on Thursday July 29, 2010 from 4 to 6 PM. The one day sample data is questionable to establish present driveway volumes. Further, the appendix assumes no growth in future demand for the truck travel center. “Cumulative plus Project PM” Synchro input volume sheet for Intersection #10 Knighton Road northbound ramps shows 657 right turning vehicles per hour and 2 percent heavy vehicles. If half the trucks are northbound and half are entering, that leaves 25. 25/657 is 3.8 percent. Given these facts, Appendix D underestimates the present impact of truck traffic on Knighton Road and the Interstate 5 interchange, and significantly underestimates future impact.

P

Mitigation Measure 3.12-8a requires that the proponent construct the proposed circulation plan shown in Figure 3.12-20 serving the Travel Centers of America site and the proposed project. However, there is no discussion regarding whether the Travel Centers of America has been consulted or agreed to the proposed circulation changes. The lack of information whether cooperation exists for the circulation plan furthers consideration of analyzing the relocation of the project access to Churn Creek Road.

Q

Caltrans suggests that the DEIR analyze relocation of the project access driveway to Churn Creek Road because of the close intersection spacing from the interchange ramps, resultant anticipated traffic congestion, unsafe queuing of the northbound ramps, expected long queues, waits through multiple signal cycles,

R

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difficult maneuvering to reach the site, no analysis of interchange design alternatives for existing and future uses, and to provide adequate circulation for the existing truckstop use.

R cont.

Impact 3.12-11 of the original DEIR discusses supporting alternative transportation. The discussion is limited to bicycles. Alternative transportation must also consider transit and pedestrians. Congestion management practices may also be included to reduce vehicle trips, green house gas emissions, and air quality impacts.

S

Shasta County roadway improvement standards are required to be met. The EIR also should state that for freeway facility improvements, the project must address state and federal design standards. The regulatory setting discussion regarding federal regulations should indicate that freeway improvements will need to meet FHWA standards.

T

Furthermore, impacts to other I-5 interchanges and transportation facilities outside of the county jurisdiction are recognized in the PRDEIR; however, mitigation measures are not included that would address these impacts. The PRDEIR should be revised to incorporate mitigation for these impacts as appropriate.

U

**Disclosure of Public Facilities Impact Fees Ordinance Mitigation Fee calculations vs. CEQA Fair Share** - Table 3.12-18 and Mitigation Measures 3.12-2a, 2b, 5a, 5b – The table in the original DEIR previously identified the project’s fair share percentage toward these improvements. This has been replaced with the project shall pay its Fair share fees toward these improvements in accordance with Shasta County Ordinance 665 Public Facilities Impact Fees. There is no disclosure of what the project’s share is toward these improvements, no comparison of how the Impact Fee Program calculation would “cover” the project’s share relative to CEQA fair share, or what the formula is for the Public Facilities Impact Fees Ordinance.

V

Mitigation Measure 3.12-5a references Figure 3-2. The measure should also reference Figure 3.12-20 which discloses the entire circulation system needed that includes the proposed truck driveway onto Pacheco Road.

W

**Project Phasing** - The DEIR presents confusion because only the full build out project is analyzed. The traffic analysis is inconsistent with the project description on DEIR page 2-1 that states that the project, “(is) to be phased in accordance with market conditions and required improvement thresholds.” The DEIR Traffic Section does not present thresholds for the number of trips, types of commercial uses, or commercial square footage trips that could be accommodated with the remaining capacity of the interchange. It also does not consider thresholds of commercial use trip generation that will result in exceeding the two-lane capacity of the existing facilities and does not identify capacity thresholds that can be considered based on interim improvements, such as intersection signalization, ramp metering, or road widening of local streets without replacement of the two-lane interchange overcrossing. If the development is proposed in a manner that immediately exceeds the capacity of the affected interchanges, the project should be fully responsible for constructing the improvements needed to accommodate the project.

X

**Ramp Metering** - Our December 23, 2009 letter requested ramp metering be considered to protect mainline Interstate 5 operations, but ramp metering is not mentioned in the report. Caltrans continues to request that ramp metering be assessed as a potential mitigation measure at the affected interchange ramps based on adopted District and Department policy.

Y

## **Caltrans I-5 Improvement Plan Shasta County**

### **Introduction**

In April 2009, the Shasta County Regional Transportation Planning Agency (SCRTPA) released the *Shasta County Regional Improvement Program (SCRIP) Nexus Study* to support impact fees on new development to fund transportation projects on Interstate 5 (I-5). Public hearings were held in the cities within Shasta County. The fees were approved by the City of Shasta Lake. Shasta County chose not to hold a public hearing to vote on implementation after the cities of Anderson and Redding chose not to approve the SCRIP fees. The Plan would only be implemented if all four jurisdictions approved the program.

The California Environmental Quality Act (CEQA) requires that transportation impacts from local development projects be identified and that significant impacts be mitigated, including impacts to the state highway system. Individual developments should contribute their "proportional share" of costs to mitigate the traffic impacts of their projects. The term "proportional share" means the percentage of mitigation costs attributable to a project as determined by the percentage of additional traffic a project will contribute to the state highway system.

The Caltrans I-5 Improvement Plan (Plan) is to serve as a starting point for discussion with local approving agencies, the developer, and Caltrans on what may be acceptable to mitigate I-5 traffic impacts. It is not intended to serve as the only traffic analysis required, nor as a comprehensive list of options that will meet the mitigation needs of a project. Specific mitigation projects and proportional share fees will be determined and negotiated with lead agencies on a case-by-case basis.

### **Purpose of this Plan**

The Plan will serve as a high level implementation document for improvements to I-5 within Shasta County that will meet the needs of the traveling public, mitigate development impacts, and accommodate future growth. The costs associated with the projects (Table 2) are planning level estimates only. Actual project costs would be determined when project specifics are more fully identified.

### **Plan Area**

The Caltrans I-5 Improvement Plan (Plan) begins at the Tehama / Shasta County line and extends north to the I-5 / State Route 151 overcrossing or postmiles 0.0 to 24.08, but is limited to the existing four-lane highway sections. The Plan includes only the I-5 mainline and does not include interchanges, ramps, or local roads.

### **Need for Projects**

The most recent Level of Service (LOS) and Traffic Volume data compiled by Caltrans for the I-5 Transportation Concept Report was based on the Shasta County Travel Demand Model, and was used in the Shasta County SCRIP Nexus Study. See Table 1 for specific freeway segment information. In 2005 the Peak Hour LOS on most I-5 freeway segments in Shasta County was B or C. It is forecast that if no I-5 improvements are made, the LOS for four-lane segments in Shasta County would reach F by 2030. The LOS

would be improved to LOS C or D in these same segments with the addition of a third through lane in each direction on I-5.

The Shasta County Travel Demand Model projects growth in Shasta County to occur at rates from 1 to 2 percent annually depending upon the type of development, with residential development estimated at 1.4 percent annually. The rates are forecasted through the 2030 year (Fix Five Partnership Impact Fee Nexus Study, page 2). It is acknowledged that these growth percentages have not been realized due to the current economic climate. However, it is still anticipated that projected growth will result in the same LOS figures presented in Table 1.

**Table 1: I-5 2005 and 2030 Level of Service and Traffic Volumes  
Shasta County**

Segment	Location	Postmile	Peak Hour Level of Service			Average Daily Volumes		Peak Hour Volumes	
			2005	2030 Un-improved	2030 Improved	2005	2030	2005	2030
7S	Shasta County border to 4th Street OC	0 - 0.9	C	F	C	42,000	84,000	5,300	6,700
8	4th Street OC to SR 273	0.9 - 3.6	D	F	C	52,000	94,000	5,400	7,400
9	SR 273 to Riverside Ave OC	3.6 - 6.7	C	F	C	52,000	93,000	5,700	7,500
10	Riverside Ave OC to S. Bonneyview OC	6.7 - 12.2	C	F	D	55,000	92,000	5,700	7,500
11	S Bonneyview OC to I-5/SR 44	12.2 - 15.6	C	F	D	62,000	103,000	6,500	8,300
12	I-5/SR 44 to SR 273 North	15.6 - 18.8	D	F	D	58,000	99,000	6,300	8,000
	North SR 273 to SR 151 OC	18.8 - 22.2	B	C	C	46,500	65,000	4,700	5,200
13	SR 151 to Mountain Gate OC	22.2 - 24.8	B	D	B	21,800	37,000	3,800	4,800

2030 Unimproved LOS assumes no improvements made to I-5.

2030 Improved assumes the addition of a third lane in each direction on I-5.

Sources: Caltrans, Willdan, MuniFinancial, SCRIP 2009

### Project Identification

Currently, most sections of I-5 within Shasta County are two lanes in each direction, with interchanges spaced throughout to provide access to the local road system. Caltrans traffic analysis, as published in the *June 2008 I-5 Transportation Concept Report*, indicates that traffic volumes will increase by the 2030 year so that the Level of Service in the four-lane sections will be reduced in the peak hour timeframes to LOS F.

If I-5 were expanded to three lanes in each direction, the 2030 year peak hour LOS would be C / D. Please see Table 2 for specific information on the project locations and planning-level costs.

Other transportation projects that should be analyzed include ramp metering (see District 2 Ramp Meter policy), merge/diverge analysis for ramp operation, and signal modifications at ramp termini. Additional transportation improvement projects not specifically mentioned here should also be considered to improve the short-term operation of the freeway and interchanges.

**Table 2: I-5 Improvement Project Costs (2007 dollars)  
Shasta County**

Segment	Location	Post - miles	Miles	Roadway		Structures		Total
				Construction	Support	Construction	Support	
7S	Shasta County border to 4 <sup>th</sup> Street OC	0 - 0.9	0.9	\$6,000,000	\$1,620,000	\$11,500,000	\$3,105,000	\$22,225,000
8	4 <sup>th</sup> Street OC to SR 273	0.9 - 3.6	2.7	Funded by Proposition 1B CMIA				
9	SR 273 to Riverside Ave OC	3.6 - 6.7	3.1	\$25,000,000	\$6,750,000	\$30,000,000	\$8,100,000	\$69,850,000
10	Riverside Ave OC to S. Bonneyview OC	6.7 - 12.2	5.5	\$30,000,000	\$8,100,000			\$38,100,000
11	S Bonneyview OC to I-5/SR 44 connect	12.2 - 15.6	3.4	Funded by Proposition 1B CMIA savings				
12	I-5/SR 44 to SR 273 North	15.6 - 18.8	3.2	\$20,000,000	\$5,400,000	\$7,000,000	\$1,890,000	\$34,290,000
	North SR 273 to SR 151 OC	18.8 - 22.2	3.4	Already 8 lanes - additional lanes not needed				
13	SR 151 to Mountain Gate OC	22.2 - 24.8	2.6	\$16,000,000	\$4,320,000	\$2,000,000	\$540,000	\$22,860,000
<b>Total</b>			<b>18.7</b>	<b>\$122,000,000</b>	<b>\$32,940,000</b>	<b>\$60,500,000</b>	<b>\$16,335,000</b>	<b>\$187,325,000</b>

Sources: Caltrans, Willdan, MuniFinancial

### Funding Plan

The following are funding sources that may be used to fund I-5 improvements:

- The State Transportation Improvement Program (STIP) is a transportation improvement funding program that can be used for capacity-increasing state highway projects. The two STIP funding sources for highway projects are the Regional Transportation Improvement Program (RTIP) and the Interregional Transportation Improvement Program (ITIP).
- **Regional Transportation Improvement Program (RTIP)** funding for regional improvements is derived from the State Transportation Improvement Program (STIP). Seventy-five percent of the STIP funds go to the Regional Transportation Planning Agencies to set priorities for these funds.

The agencies may prioritize I-5 improvements subject to approval by the California Transportation Commission (CTC).

The regional shares are anticipated to be between \$3.5 and \$5.5 million per year. Over 20 years, this equates to \$70-\$110 million. RTIP funds (excluding the ITIP funds) may be used for local street and road projects, as well as State highway projects. There will be other state highway system needs in the next 20 years. These fund estimates are optimistic and are likely to be the maximum funding levels that can be assumed. This Plan assumes that \$55 million of Regional Transportation Improvement Program funding may be used to build a third lane on I-5 (Table 3) over the next 20 years.

- **Interregional Transportation Improvement Program (ITIP)** is also funded from STIP, with Caltrans setting priorities and requires approval by the CTC. Twenty-five percent of the STIP funds are committed to the ITIP, which is dedicated to interregional State highway improvements. I-5 improvements would be eligible for funding from this source. However, statewide project needs far outweigh the availability of funding from this source. Historically, the CTC has prioritized funds to regions that have agreed to pay for a portion of a highway project with a local (non-state) funding source such as tax measure or impact fee funds. This Plan assumes that \$55 million of ITIP funding may be available to match the RTIP funding (Table 3) over the next 20 years.
- **State Highway Operation and Protection Plan (SHOPP)** funding is prioritized by Caltrans and approved by the CTC. SHOPP funds are for the maintenance and operation of the State highway system through rehabilitation, capital maintenance, safety, storm damage, and other programs. SHOPP funding cannot be used for capacity improvements.
- **Bond Funding** – Proposition 1B funds provided about \$19.1 billion from bond sales for transportation projects. The Cottonwood Hills Truck Climbing Lane and the South Redding 6-Lane projects, both on I-5, were funded through Proposition 1B. Proposition 1B funding is a one-time source of transportation funding, not an ongoing funding source. Additional bond funding cannot be relied upon in the near future.
- The U.S. Congress (Federal) may also provide future funding opportunities through earmarked legislation or other federal legislation that is not known at this time. Recent examples of unanticipated federal transportation funding opportunities include the American Recovery and Reinvestment Act (ARRA and TIGER funds).
- **Federal Transportation Reauthorization.** The previous federal transportation authorization bill expired on September 30, 2009 and is being extended for short periods of time. A new transportation bill is being formulated. It is not known at this time what the reauthorization bill will look like or what funding opportunities will be available.

Z cont.

- Local sales tax measures. Nineteen California counties, comprising 83% of the state's population, have imposed local sales tax measures (self-help counties) to help pay for local transportation projects. It is not anticipated that Shasta County will impose a local transportation sales tax in the near future.
- Local Development Funds are developer-paid funding to offset impacts caused by development projects. Table 13 on Page 49 of the *Shasta County Regional Improvement Program Impact Fee Nexus Study* showed the maximum attributable fee for new development to be \$2,190 per equivalent dwelling unit (EDU). This figure represents the average allowable fee attributable to new development based on the assumption all new development in the region would participate. Analysis of individual developments may yield a higher or lower figure depending on the development. The *Fix Five Partnership; Phase I Impact Fee Nexus Study* shows the same amount on page 50, Table 11. This amount is not proposed as a fee schedule, but only restates the amounts arrived at in previously completed proposed fee program nexus studies for the I-5 Corridor in Shasta County. The analysis was done on a regional level, not a project or location-specific level. Since this fee was not adopted, the assumptions in the two studies are not valid for specific project mitigation. Caltrans will work with the lead agency to determine project specific mitigation based on the mutually agreed project specific impact studies.

**Table 3: I-5 Improvements Anticipated Funding**

Cost of Projects in Shasta County		\$187,325,000
<b>Funding for additional lanes on I-5 in next 20 years:</b>		
STIP (RTIP/ITIP)	\$110,000,000	
Other Sources *	\$ 77,325,000	
<b>Total</b>	<b>\$187,325,000</b>	

\*Future bonds, federal earmarks, developer mitigation, etc.

**Suggested Documents to Review**

- Caltrans District 2 Ramp Meter policy
- Caltrans Guide for the Preparation of Traffic Impact Studies
- Caltrans District 2 Origination & Destination Traffic Study (2007)
- Caltrans I-5 Transportation Concept Report
- draft 2010 Shasta County Regional Transportation Plan
- Shasta County Regional Transportation Improvement Program
- Fix 5 Nexus Study

Z cont.

# ATTACHMENT 3

DEPARTMENT OF TRANSPORTATION  
OFFICE OF COMMUNITY PLANNING  
1657 RIVERSIDE DRIVE  
P. O. BOX 496073  
REDDING, CA 96049-6073  
PHONE (530) 229-0517  
FAX (530) 225-3020  
TTY (530) 225-2019



*Flex your power!  
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December 24, 2009

IGR/CEQA Review  
Sha-5-9.77

Ms. Lisa Lozier  
Shasta County Department of Resource Management Planning Division  
1855 Placer Street  
Redding, CA 96001

Knighton & Churn Creek Commons  
Retail Center (Hawkins)  
GPA 08-002, Z 08-003 DEIR  
SCH# 2009012088

Dear Ms. Lozier:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Knighton and Churn Creek Commons Retail Center. The project requests a General Plan amendment and zone amendment to consider a 740,000 square foot retail commercial and entertainment center in the northeast quadrant of the Interstate 5 (I-5)/ Knighton Road interchange.

The DEIR Appendix O contains 250 pages of technical data but is not well summarized in the Traffic Section of the DEIR. Adequate disclosure of the traffic analysis and micro-simulation computer model is critical since the project results in the addition of 24,801 daily weekday trips and 33,000 Saturday mid-day trips. Figure 3.12-4 identifies that 78% of the project traffic is expected to travel through the Knighton Road interchange and 76% will travel on I-5. The technical data is inadequate for Caltrans review of the impacts to the State's facilities.

AA

In response to the Notice of Preparation (NOP), Caltrans requested an analysis of this regionally significant project's impacts on mainline I-5, including the project's impacts on the overall capacity of the existing 4-lane freeway. The document does include fair share percentages for some improvements to the merge/diverge areas of the ramps at the interchanges, but the supporting documentation for those calculations has not been included. Due to the amount of resultant trips from this project, a clear analysis of mainline I-5 impacts needs to be disclosed.

BB

In the absence of the analysis and data identified in the attached comments, the DEIR fails to adequately disclose the supporting information for the conclusions presented. Recirculation of the DEIR is necessary to make a good faith effort to disclose to the public and decision makers the consequences of this project. It is also critical that the DEIR identify and implement feasible mitigation measures due to concerns with not only this project, but also other development contemplated within the I-5 corridor and the long-term operations of the State Highway system.

CC

Caltrans will continue to offer the opportunity to work diligently with the County and the Shasta County Regional Transportation Planning Agency to obtain the mitigation measures needed to reduce the traffic impacts of this project and to identify alternative mitigation measures that may be considered to reduce the project's traffic impacts. We look forward to receiving and reviewing the responses to these comments in the recirculated draft EIR. If you have any questions, please do not hesitate to call me or my staff at (530) 229-0517.

DD

Sincerely,

Handwritten signature of Michelle Millette in cursive.

MICHELLE MILLETTE, Chief  
Office of Community Planning  
Caltrans District

Attachment

**ATTACHMENT**  
**KNIGHTON & CHURN CREEK COMMONS RETAIL CENTER (HAWKINS) DEIR**  
**CALTRANS DISTRICT 2 COMMENTS**  
**December 24, 2009**

**Incomplete Traffic Data**

In response to the NOP, Caltrans requested analysis of this regionally significant project's impacts on mainline I-5, including the projects impacts on the overall capacity of the existing 4-lane freeway. The document does include fair share percentages for some improvements to the merge/diverge areas of the ramps at the interchanges, but the supporting documentation for those calculations has not been included.

EE

Caltrans is particularly interested in the technical review of the traffic simulation and inputs (assumptions) used. In order to provide adequate disclosure and a method for verifying the impact analysis and proposed mitigation measures, we again requested this information in our letter dated November 19, 2009 but the entire electronic traffic simulation (both input and output) files have not been provided in order for Caltrans to run the simulation. These concerns are further described in the "Synchro Output Data and Disclosure of Micro-Simulation Data" section. Once the information is provided, we will also be verifying that the micro-simulation represents a full operational analysis between the project and the interchange and the resultant impacts to mainline I-5. In the absence of this information, the document fails to adequately disclose the supporting information for the conclusions presented.

FF

The DEIR Traffic Section does not describe the mainline I-5 segment impacts, as requested in Caltrans' NOP response. However, Appendix O does include two tables showing the vehicles per lane density, changes to highway speeds, and Level of Service (LOS) in the Basic Freeway Segments Capacity Analysis for Cumulative No Project and Cumulative plus Project conditions. The Basic Freeway Segments Capacity Analysis needs to address Existing conditions, Existing plus Project, Cumulative conditions, and the Cumulative plus Project conditions. This information needs to be included in the Traffic Section of the EIR.

GG

Caltrans requests that the specific traffic volumes used and supporting calculations be provided for review to verify the proportionate shares presented in the DEIR and that the mainline segment impacts and mitigation measures be included in the Traffic Section of the DEIR for the benefit of the public and decision makers reading the document. The information presented in the DEIR is inadequate to disclose these concerns.

**Direct Plus Project Impacts and Mitigation Measures**

As disclosed in Table 3.12-9 (DEIR p. 3.12-14) and Table 3.12-11b (DEIR p. 3.12-19), most of the transportation facilities, including the interchange, are currently operating with ample existing capacity. Approval of a General Plan amendment and the addition of this project to the two-lane interchange overcrossing results in a **direct significant impact** that degrades the Level of Service (LOS) and volume to capacity ratio (v/c) from LOS B and C at the Knighton Road ramp intersections (Table 3.12-4, DEIR page 3.12-6) to unacceptable LOS F and recommends widening of the road section between the ramps (which is the interchange overcrossing) to six lanes and signalization of the ramp intersections (Tables Table 3.12-11b, DEIR page 3.12-19; Table 3.12-9, DEIR page 3.12-14; and Table 3.12-11a, DEIR page 3.12-18). The DEIR fails to clearly identify that if additional lanes are needed, the overcrossing structure would require replacement.

HH

## Freeway Overcrossing Impacts

Table 3.12-11b identifies that the roadway LOS on Knighton Road between the ramp intersections also goes from existing LOS A to LOS F with the project (Tables 3.12-9 and 3.12-11b, DEIR pp. 3.12-9 and 19). Table 3.12-11b further identifies that the mitigation necessary is to widen the roadway (overcrossing) to **six (6) lanes**, confirming that the capacity of the two-lane facility is exceeded with this project alone. However, Mitigation Measure 3.12-1a on page 3.12-15 recommends widening the overcrossing from two-lanes to **four (4) lanes** which conflicts with Table 3.12-11b that identifies six lanes. Interestingly, Figure 2-3, although conceptual, depicts a seven lane overcrossing. This internal inconsistency undermines the validity of the conclusions presented. The document should be revised to clearly determine what infrastructure improvements are needed.

II

It should also be noted that Caltrans cannot permit the existing overcrossing to be widened due to inadequate sight distance. In each case, the addition of the plus-project traffic alone requires that the overcrossing be replaced.

JJ

The DEIR in Section 3.12.3, page 3.12-13, presents confusion because only the full build out project is analyzed. The traffic analysis is inconsistent with the project description on DEIR page 2-1 that states that the project, **“(is) to be phased in accordance with market conditions and required improvement thresholds.”** The DEIR Traffic Section does not present thresholds for the number of trips, types of commercial uses, or commercial square footages trips that could be accommodated with the remaining capacity of the interchange. It also does not consider thresholds of commercial use trip generation that will result in exceeding the two-lane capacity of the existing facilities and does not identify capacity thresholds that can be considered based on interim improvements, such as intersection signalization or road widening of local streets without replacement of the two-lane interchange overcrossing. If the development is proposed in a manner that immediately exceeds the capacity of the affected interchanges, the project should be fully responsible for constructing the improvements needed to accommodate the project.

KK

The DEIR analysis figures need to be revised to reflect the conclusions reached in the traffic analysis. The figures need to accurately and consistently disclose the lane configurations necessary to meet the plus-project conditions, the cumulative plus project conditions, and since the project proposes a general plan amendment, the general plan buildout conditions.

LL

The revised figures need to address the interchange footprint necessary to change the existing geometrics to reflect current design standards that may either expand the footprint of the interchange or may result in changes to the location of the ramp intersections to reflect the changes in approach slopes. Provisions for pedestrians and bicycles also need to be included.

MM

## General Plan Consistency

The project proposes a General Plan amendment. The relevant circulation policies are listed in the DEIR pages 3.12-10 and 11. The policies include Policy C-6l that requires, in part, that where a project results in LOS E (or worse) on existing facilities the project shall either demonstrate all feasible methods of reducing travel demand or the provision of capacity improvements to the specific road link, the transit system, or any reasonable combination. Table 3.12-8 on DEIR page 3.12-10 discusses General Plan consistency with the policies but does not include Policy C-6l.

NN

As previously identified, Impact 3.12-2 and Table 3.12-10 identify that the addition of the project to the existing conditions will result in a direct significant impact to delay and unacceptable LOS. Policy C-6l is

identified in the impact threshold of significance discussion for roadway segments and intersections. The mitigation measures included in the DEIR should be adopted and implemented to find the project consistent with the General Plan. This would require that the project be responsible for mitigating the traffic impacts by constructing the transportation improvements necessary to accommodate the project traffic.

NN cont.

The resultant anticipated traffic congestion, expected long queues, waits through multiple signal cycles, and difficult maneuvering to reach the site should also be considered in concluding whether emergency access will be impeded at full buildout.

### Synchro Output Data and Disclosure of Micro-Simulation Data

DEIR page 3.12-6 discusses that the Synchro/SimTraffic micro-simulation software was used to evaluate the project site. However, without the inputs or the entire simulation, Caltrans is unable to verify the conclusions presented. The inputs and simulation are also critical to determine if the intersections were analyzed independently or analyzed and simulated together as a coordinated signal system. The difficulty in agreeing with the document's conclusions is demonstrated in the Queuing and Blocking Report in Appendix O. The report looks at the ramp intersections in the Cumulative plus Project PM conditions, but shows that a total of six lanes (three westbound and three eastbound) were analyzed for the I-5 Knighton northbound ramps but only four lanes (three westbound and one eastbound) for the southbound ramps.

OO

Given the close proximity of the project access and adjacent intersections, a coordinated system analysis of all the intersections in the project vicinity is needed to determine the resulting impacts as queuing from one intersection will likely affect the operation of adjacent intersections. The impact discussion in the Transportation Section of the DEIR needs to disclose all of the intersections affected, the percentage of time that queues will exceed the vehicle lane storage length, and the number of signal cycles traffic will be delayed.

The location of the project access may have to be relocated to Churn Creek Road in order to provide for the safe and efficient operation of the I-5 ramps. From the limited analysis provided, it appears that traffic from the ramps will queue onto mainline I-5. Traffic queuing that results in stopped vehicles on an interstate mainline presents a significant safety concern.

PP

It should be noted that as indicated on DEIR page 3.12-9, Caltrans considers the LOS C/D threshold as the threshold for significant impacts, per the Caltrans' "Guide for the Preparation of Traffic Impact Studies" (TIS Guide). Caltrans does not consider LOS E an acceptable level of service for its facilities. The DEIR should identify the state facility locations where the Caltrans threshold is exceeded. Caltrans considers these impacts to be significant direct impacts for Existing plus Project conditions and significant cumulative impacts in the Cumulative plus Project conditions. Section 3.12 of the DEIR does not accurately represent this for Caltrans facilities.

QQ

The Synchro output data in Appendix O shows the assumed amount of heavy vehicles using the I-5 Knighton northbound ramps as 2% to 6% of the total traffic (Appendix O, Synchro 6 Report, page 10). This assumption needs to be explained as it appears low given the adjacent truck stop/fueling facility. Other output sheets do not indicate what percentage of heavy vehicles are assumed which further emphasizes the need for complete disclosure of the input assumptions and micro-simulation files needed to assess the conclusions presented.

RR

Impact 3.12-3 identifies a significant direct impact at the Cypress Avenue/I-5 northbound merge. Since this **significant direct impact** is a result of adding the project traffic to the existing conditions, mitigation should be the responsibility of this project. Mitigation Measure 3.12-3 requires the addition of a third northbound

SS

travel lane to I-5. The DEIR should disclose the length of the third lane needed to mitigate this significant direct project impact. Similarly, the DEIR should disclose the length of the third lane needed for those mitigation measures affecting the I-5 merge and diverge areas of the affected interchanges. Ramp metering should be assessed as another potential mitigation measure at the affected interchange ramps.

SS cont.

### **FHWA Approval of Interchange Modifications**

As noted in our NOP response, modifications to the interchange will require Federal Highway Administration (FHWA) approval. The DEIR lacks any discussion of alternative interchange designs. The County and the developer are advised that at the time an encroachment permit is applied for, the applicants may be required to analyze alternative interchange designs. The expanded analysis may result in improvements that differ from the proposed mitigation measures in the DEIR. It should be noted that Caltrans and FHWA are the lead agencies for projects within the interstate right of way. Therefore, the applicant will be required to prepare environmental documentation acceptable to FHWA and Caltrans for those projects.

TT

Mitigation Measure 3.12-7 addresses Shasta County roadway improvement standards (DEIR, page 3.12-40). The measure should either be amended or a new measure added to state that for freeway facility improvements, the project will need to address state and federal design standards. The regulatory setting discussion on DEIR page 3.12-9 regarding federal regulations should indicate that freeway improvements will need to meet FHWA standards.

UU

### **Cumulative Plus Project Impacts and Mitigation Measures**

The DEIR on page 3.12-26 finds the mitigation measures for cumulative plus project conditions to be significant and unavoidable. It also questions the funding and jurisdiction controls for implementing mitigation measures. In regards to utilizing the Shasta County Regional Improvement Program Impact Fee Nexus Study (SCRIP), the DEIR does not make any recommendations that the County adopt the program to address the mitigation measures. The DEIR references the study as an adequate basis for determining proportionate share mitigation. In the absence of an adopted mitigation fee program for the state highway facilities, the DEIR must determine the project's proportionate share impacts and mitigation measures based on the project traffic and the changes to the buildout conditions for the General Plan amendment.

VV

### **Feasible Mitigation Measures**

CEQA prohibits public agencies from approving projects that will have significant effects on the environment unless certain findings are made. The agency must find – for each significant effect – that mitigation measures or alternatives have either been adopted by the agency, should and can be adopted by another agency with exclusive responsibility and jurisdiction over the affected resource, or that the mitigation or alternatives are infeasible. Additionally, in order to approve a project that will have significant but unavoidable effect, overriding economic, legal, social, technological, or other benefits of the project must be found to outweigh the significant effects.

The DEIR cites the fact that the freeways are not under the precise jurisdiction of the County as supporting rationale for a finding of "significant but unavoidable" impact and provides no analysis of overriding considerations. The findings are inadequate under CEQA. The DEIR must adopt the mitigation measures or explain why they are not feasible and make findings of overriding considerations. Offsite mitigation or proportionate share contributions have consistently been upheld as appropriate methods of mitigation. Since the Department has the procedural mechanisms in place to allow other agencies to construct projects on the State Highway System, the measures are feasible.

WW

Caltrans strives to work in partnership with the local agencies (cities and counties) to mutually agree on the appropriate transportation project(s) to mitigate the impacts of development on the state highway system. Many local agencies and private developers fund and build state highway improvement projects, either through the encroachment permit process, or if the project is more complex, through the Caltrans Planning Division's Oversight Project Manager. One current and local example is the City of Anderson's installation of a traffic signal on State Route (SR) 273 at Alexander Avenue. Even though Caltrans is the owner-operator of the state highway system, local agencies are not prohibited from funding or building state highway projects.

The statement in the DEIR that the County cannot build the improvements or be certain that the improvements will be built because it is not in their jurisdiction or funding has not been fully guaranteed is inaccurate and should be revised. The forefront issue should be whether there is an obligation to mitigate the project's impacts per CEQA, which the document recognizes, and to correctly identify that there are methods to insure and monitor their construction through conditions of approval, development agreements, and cooperative agreements. The recommended mitigation measures that include the requirements of other agencies, such as Caltrans, the California Department of Fish and Game, the Regional Water Quality Control Board, or the US Army Corps of Engineers, are feasible and are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the County consistent with Section 15126.4 of the CEQA Guidelines.

To this end, it is further requested that the transportation mitigation be negotiated between the County and Caltrans. The desired results of the negotiated traffic mitigation would be that the project applicants/developer(s) shall contribute a proportionate share amount for all needed improvements, both within the County jurisdiction and outside the County jurisdiction. The proportionate share calculations shall also be verified in consultation with Caltrans. Where the impacts are located within the City of Anderson, or the City of Redding, those jurisdictions shall agree on proportionate share mitigation. The proportionate share funds shall be held by Shasta County. As the freeway and interchange improvements identified in the EIR are proposed, designed, and planned for construction by the developer with oversight by the responsible agency, the County will offer the developer's contribution to the appropriate agency. If the identified improvements are not constructed, or if findings are not made to demonstrate the improvements will be made, the County, in cooperation with Caltrans, may agree to redirect the developer's fund contributions to other improvements within Shasta County required to mitigate the project's impacts. This mechanism will ensure that the collected mitigation funds will be spent on the measures identified in the EIR or on alternative improvements that will reduce the project's transportation impacts.

WW cont.

Alternatively, the project proponent can fund and build the entire mitigation, and get reimbursed when other development contributes to the funding of the mitigation improvement project.

The DEIR raises concerns about the lack of a guaranteed funding source or program for the projects needed to address the significant cumulative impacts. Available funding sources include local development fees, state and federal gas taxes (RTIP), and impact fee programs, such as the County's Public Facilities Improvement Program. The County's Public Facilities Improvement Program collects impact fees toward improving the Knighton Road interchange. The interchange improvement needs are also included in the Shasta County RTP, but are not currently prioritized for construction. The priority for improving the Knighton Road interchange has not been needed because, until this project was proposed, there has been adequate remaining capacity for existing development. However, the RTP can be amended to raise the project funding priority of these improvements.

## Project Alternatives

DEIR Chapter 4 discusses the project alternatives including a Reduce Size Alternative. The discussion identifies that the Reduce Size Alternative would result in fewer vehicle trips and lower impacts to the interchange and roadway segments. It concludes that the alternative would have the same potential for vehicle conflicts and would require mitigation similar to that of the proposed project. The analysis provides no quantification to support this conclusion. Therefore, we look forward to the revised traffic analysis incorporating project phasing consistent with the project description to quantify and support the conclusion made regarding impacts and mitigation measures applicable to a reduced size alternative.

XX

## Storm Water Runoff

The discussion of Impact 3.8-5 indicates that the project will not cause an increase in the amount of storm water runoff or result in flooding on- or off-site (DEIR, page 3.8-15). Mitigation Measure 3.8-2 discusses that Best Management Practices will be utilized to reduce the potential impacts on water quality from storm water runoff and from affecting the base flood elevation that may impact I-5. Caltrans requests that prior to the issuance of building permits, a copy of the final drainage report be provided to verify the conclusions presented.

No net increase to the 100-year storm event peak discharge or increase in elevation into the State's highway right of way or Caltrans' drainage facilities may occur as a result of this project. Further, the developer must maintain or improve existing drainage patterns and facilities affected by this project to the satisfaction of the State and Caltrans. The DEIR indicates that this will be accomplished through the implementation of storm water management best management practices including detention/retention ponds or basins, sub-surface galleries, on-site storage or infiltration ditches, as appropriate. Once installed, the property owner must properly maintain these systems. The developer/owner may be held liable for future damages due to impacts for which adequate mitigation was not undertaken or maintained. All surface water runoff that is discharged to the State's highway right of way and Caltrans' highway drainage facilities must meet Central Valley Regional Water Quality Control Board clean water standards prior to discharge. The cumulative effects on drainage due to development within this area should be considered in the overall development plan of the area. Any work within the State right of way, including modifications to existing drainage facilities, will require a Caltrans encroachment permit. For more information regarding encroachment permit fees or the encroachment permit process, the applicant may contact the District 2 Permits Office located at 1000 Center Street in Redding. The telephone number is (530) 225-3400.

YY

# ATTACHMENT 4

California Department of Transportation

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## *District Directive*

Number: DP-09

Effective Date: April 18, 2008

**TITLE** Freeway Ramp Meter Implementation

### **POLICY**

Deputy Directive No. 35, dated January 3, 1995, details Caltrans' policy and responsibilities with regard to ramp metering. As stated in the directive, ramp metering is considered to be the common method of ramp entry control and is an effective tool in reducing congestion on California's freeways. Another benefit of ramp metering is the elimination of platoons of traffic entering the system, which can reduce collisions.

Within the next 10 to 15 years, freeway segments in District 2 are expected to reach undesirable levels of peak hour congestion. During these peak periods, controlling the flow of traffic entering the system will likely be needed to improve the efficiency of the corridor. Therefore, it is important that ramp metering be considered on all freeway and interchange projects, especially those affecting freeway entrance ramps.

During the planning and project development process for freeway or interchange projects in District 2, four "levels" of ramp meter implementation should be considered. These implementation levels should also be considered as mitigation for local development projects. The levels are defined by the projected peak hour density of the mainline segment downstream from the ramp merge 10 years after construction of the project. The ramp meter design for any of the levels below shall be for a 20-year design life, as required in the Ramp Meter Design Manual, unless otherwise specified by the District Traffic Engineering and Operations Office. The criteria for District 2 will be as follows:

	<b>Projected 10-yr. Peak Hour Density on Through Traffic Lanes (pc/ml/ln)</b>	<b>Ramp Meter Implementation</b>
<b>LEVEL 1</b>	18 or less	None
<b>LEVEL 2</b>	>18 – 26	R/W only
<b>LEVEL 3</b>	>26 – 35	R/W, earthwork, and below ground infrastructure *
<b>LEVEL 4</b>	>35	R/W and fully functional ramp meter *

\* With concurrence from the Traffic Engineering & Operations Office, ramp meter implementation may not be necessary, or may be deferred, if the projected 10-yr. entrance ramp volume is less than 240 vph.

### *INTENDED RESULTS*

The intent of this policy is to provide a consistent method for identifying future ramp meter needs and incorporating them into freeway/interchange projects. Ramp meter funding is not addressed as part of this policy, as there are many variables that can influence how a project is programmed, including development fees and/or cost sharing between agencies. Therefore, ramp meter funding will be determined on a case-by-case basis. Employing a system wide approach, the District will maintain a Ramp Meter Development Plan (RMDP). The RMDP identifies where ramp meters are expected to be necessary (i.e. Level 4) within the next ten years. It is noted that significant area development may create a need for ramp metering that was not anticipated in the RMDP.

### *RESPONSIBILITIES*

#### Office of Community & Regional Planning:

- Promote the concept of ramp metering as an effective traffic management strategy during regular meetings with District's Regional Transportation Planning Agencies.
- Organize and facilitate meetings between Traffic Engineering & Operations Office and local partners to develop support for ramp metering.
- Request and confirm that ramp metering implementation levels are incorporated into Traffic Impact Studies as mitigation for local development projects.
- Advocate that local agencies collect fair share fees (for ramp metering) as mitigation from development projects that cumulatively impact freeway interchanges.

#### Office of System Planning:

- Forecast freeway densities and ramp volumes for determining level of ramp meter implementation.
- Confirm projected freeway densities and ramp volumes when provided by a consultant.
- Support Traffic Engineering & Operations Office in the preparation of the District RMDP.

#### Traffic Engineering & Operations Office:

- Ensure the level of ramp meter implementation is appropriate from a system wide perspective and is consistent with the RMDP.
- Ensure compliance with the Ramp Meter Design Guidelines.

# ATTACHMENT 5

California Department of Transportation

*Flex your power!  
Be energy efficient!*

## Deputy Directive

*Number:* DD-35-R1  
*Refer to  
Director's Policy:* 08-Freeway System  
Management  
*Effective Date:* January 6, 2011  
*Supersedes:* DD-35 (1-3-95)

*TITLE* Ramp Metering

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*POLICY*

The California Department of Transportation (Department) is committed to using ramp metering as an effective traffic management strategy to maintain an efficient freeway system, and protect the investment made in constructing freeways by keeping them operating at or near capacity.

Each district that currently operates, or expects to operate, ramp meters within the next ten years, shall prepare a Ramp Metering Development Plan (RMDP). RMDP shall contain a list of each ramp meter location that is currently in operation or planned for operation within the next ten years. Each district shall update its RMDP biennially and ensure that future ramp meter locations are included in the local Congestion Management Plans.

Provisions for ramp metering shall be included in any project that proposes additional capacity, modification of an existing interchange, or construction of a new interchange, within the freeway corridors identified in the RMDP, regardless of funding source. These provisions, at each onramp, may include procurement of additional right of way, changes to ramp geometry to accommodate queue storage, installation of High Occupancy Vehicle (HOV) preferential lanes, deployment of electrical and communication systems, and construction of California Highway Patrol (CHP) enforcement areas and maintenance vehicle pullouts.

The guidelines, policies and procedures, and standards contained in the Ramp Metering Design Manual (RMDM), together with the design criteria in the Highway Design Manual (HDM), shall be applied when planning and designing ramp meters.

HOV preferential lanes shall be provided wherever ramp meters are installed, and each HOV preferential lane should be metered. Each district shall provide justification for deviation from the HOV preferential lane installation policy and obtain concurrence from the Headquarters Traffic Operations District Liaison.

### *DEFINITION/BACKGROUND*

Ramp metering is a traffic management strategy that utilizes a system of traffic signals at freeway entrance, and connector ramps to regulate the volume of traffic entering a freeway corridor in order to maximize the efficiency of the freeway, and thereby minimize the total delay in the transportation corridor.

Ramp metering has been an effective tool in reducing congestion and overall travel time on California freeways and local streets since the late 1960s. The added benefits include the reduction of both congestion-related collisions and air pollution.

The Department has installed over 2,200 ramp meters throughout the State. Installation of ramp meters on all urban freeway entrance ramps, including freeway-to-freeway connectors will be considered as a Departmental best practice, where ramp metering will maintain or improve effective operations along freeway corridors.

RMDM is a comprehensive document containing ramp meter design standards, design procedural requirements, and operational policies adopted statewide. RMDM is used to guide the Department's designers, as well as consulting engineers, and city/county engineers performing design work on freeways.

### *RESPONSIBILITIES*

#### Chief, Division of Traffic Operations:

- Develops, implements, and maintains statewide policies, manuals, and guidelines for ramp metering.
- Provides direction and assistance to district staff on ramp metering activities, as well as resources for training district staff.
- Ensures and supports the inclusion of ramp meters in projects within freeway segments containing any of the locations listed in RMDP.
- Ensures consistency among different districts on the development and implementation of ramp metering projects.
- Provides direction, training and assistance to district Traffic Operations staff on the development of the RMDP in partnership with the Division of Transportation Planning.
- Leads the development of statewide RMDP.
- Maintains a statewide inventory of planned, programmed, and constructed ramp meters.

#### Chief, Division of Transportation Planning:

- Works collaboratively with Chief, Division of Traffic Operations in the development of statewide RMDP.

- Ensures consistency among different districts on the development of their respective RMDP.
- Provides direction, training, and assistance to district Planning staff on the development of the RMDP in partnership with the Division of Traffic Operations.
- Work collaboratively with the Division of Traffic Operations in the development, implementation, and maintenance of statewide policies, manuals, and guidelines for ramp metering.

Chiefs, Divisions of Design and Construction:

- Ensure that Division policies and manuals support the current ramp metering policies. These policies include making provisions for ramp meters in project development, accommodating HOV at onramps, and construction of CHP enforcement areas and maintenance vehicle pullouts at ramp meters.
- Ensure that staff and practices support ramp metering policies.

Chief, Divisions of Maintenance:

- Leads the development of acceptance procedures to hand-off ramp meter systems to the Division of Maintenance.

District Directors:

- Ensure the provision of resources for the entire life cycle of ramp metering activities. These activities include ramp metering planning, design, construction, operations, and maintenance.
- Establish local agency support for ramp metering.
- Assign lead responsibility for development, maintenance, and implementation of RMDP in the District.

Deputy District Directors, Planning:

- In coordination with District Traffic Operations, develop and maintain the district RMDP, program funding and implement ramp metering projects with the affected local and regional transportation stakeholders.
- Submits all future ramp metering locations contained in the RMDP for inclusion in local Congestion Management Plans, Regional Transportation Plans, Department System Planning documents and other applicable planning documents developed by other agencies or the Department.
- Ensures consistency of ramp metering plans with neighboring Districts' ramp metering plans.
- Provides traffic forecasting for development of RMDP in coordination with Traffic Operations.

Deputy District Directors, Construction, Design, and Project Management:

- Ensure that provisions for ramp metering are included in all projects involving interchange modification and freeway improvements at locations identified in RMDP.

- Ensure that each existing ramp meter affected by construction projects remains operational throughout the construction period.

Deputy District Directors, Operations:

- In coordination with District Planning, develop and maintain the district RMDP.
- Develop an inventory of planned, programmed and constructed ramp meters.
- Assist Deputy District Directors, Planning to coordinate with local and regional transportation stakeholders, on the implementation of ramp metering projects and document the efforts made toward coordination and record any concurrence obtained.
- Provide district personnel with technical assistance and support on the design and operation of ramp metering systems.
- Coordinate with CHP regarding enforcement issues at ramp meters.
- Implement ramp metering policies and procedures.
- Provide justification for deviation from established ramp metering policies. Ensure consistency of ramp metering practices with neighboring Districts.

Deputy District Directors, Maintenance:

- Ensure that each ramp meter is operational.
- Ensure regular inspection of each ramp meter.
- Ensure the minimization of traffic delay when repairing existing ramp meters.

District Project Managers:

- Ensure that ramp meters are included in the earliest stage of project development and are not eliminated during the project delivery process.
- Identify necessary project resources for the installation of ramp meters.
- Work closely with district Traffic Operations to ensure that ramp metering requirements are satisfied.
- Ensure the approval of Fact Sheet for exception to ramp metering policies.

District Ramp Metering Staff:

- Support the development and maintenance of the district RMDP.
- Review ramp metering plans and specifications, and coordinate with Design, Construction and Maintenance to design, construct, operate, and maintain ramp meters.
- Work with District Construction to ensure that each existing ramp meter affected by construction projects remains operational throughout the construction period.
- Prepare, review, and implement ramp metering rates that will maintain effective operations along freeway corridors.

District Design Engineers and Office Engineers:

- In coordination with district Traffic Operations, identify and incorporate the need for ramp meters and HOV preferential lanes in the Project Study Report, Project Report, and Environmental Documents.
- Provide Standard Special Provisions and Contract Plans for ramp metering elements, including system integration needs such as communications, and compatibility of software.
- Provide Fact Sheet for exception to ramp metering policies.

District Construction Engineers (Electrical and Civil), Resident Engineers, and Encroachment Permit Inspectors:

- Ensure that ramp metering elements are installed according to the Standard Special Provisions, Standard Specifications, and Contract Plans.
- Ensure that each ramp meter affected by construction projects remains operational throughout the construction period unless otherwise specified in the contract documents.
- Immediately notify district Traffic Operations personnel of any change in status of each ramp meter affected by construction projects.
- Ensure that each ramp meter affected is fully reviewed, tested, and operational prior to accepting a contract and closing the project ID number.

*APPLICABILITY*

All Department employees involved with ramp metering activities.

*Original Signed by:*

*January 6, 2011*

\_\_\_\_\_  
MALCOLM DOUGHERTY  
Chief Deputy Director, Interim

\_\_\_\_\_  
Date Signed

**Letter 85.1 Michelle Millette, Chief, Office of Community Planning, Caltrans District 2, California Department of Transportation**

**Response 85.1A:** The DEIR and PRDEIR are required by CEQA to provide project data and analysis which will permit the lead agency to evaluate project impacts, identify appropriate mitigation measures to climate or substantially avoid such impacts, and make appropriate findings based on the data and analysis. They are not required to “demonstrate that the conclusions presented (sic) can be verified by all who desire to review the document”.

The Department’s concerns enumerated in this paragraph will be addressed as such concerns are further described in later paragraphs of the comment letter and its attachments.

The County has addressed all identified impacts and provided for appropriate mitigation.

**Response 85.1B:** The Department may, since it “does not accept the DEIR or Traffic Impact Study (TIS)”, legally challenge the adequacy of the EIR or supplement the document, prepare a subsequent EIR, or assume, if deemed applicable, the role of a new lead agency.

**Response 85.1C:** The comment is noted and incorporated in the EIR. The EIR and PRDEIR have addressed the interchanges and main-line I-5 operations. The County looks forward to working in partnership with Caltrans on the project.

**Response 85.1D:** The comment is noted and incorporated in the EIR. Please refer to Response 85.1A. The County has committed to the appropriate mitigation measures in which it is in the lead agency's power to implement or require implementation.

**Response 85.1E:** The comment is noted.

**Response 85.1F:** The comment is noted and incorporated in the EIR. It is believed that the information in and appended to the PRDEIR is sufficient for reasoned analysis of and determination regarding project impacts and pertinent mitigation measures.

**Response 85.1G:** The referenced document is reproduced here in pertinent part (from its Introduction); underlining has been added:

**Caltrans I-5 Improvement Plan  
Shasta County**

**Introduction**

In April 2009, the Shasta County Regional Transportation Planning Agency (SCRTPA) released the Shasta County Regional Improvement Program (SCRIP) Nexus Study to support impact fees on new development to fund transportation projects on Interstate 5 (I-5). Public hearings were held in the cities within Shasta County. The fees were approved by the City of Shasta Lake. Shasta County chose not to hold a public hearing to vote on

implementation after the cities of Anderson and Redding chose not to approve the SCRIP fees. The Plan would only be implemented if all four jurisdictions approved the program.

The California Environmental Quality Act (CEQA) requires that transportation impacts from local development projects be identified and that significant impacts be mitigated, including impacts to the state highway system. Individual developments should contribute their "proportional share" of costs to mitigate the traffic impacts of their projects. The term "proportional share" means the percentage of mitigation costs attributable to a project as determined by the percentage of additional traffic a project will contribute to the state highway system.

The Caltrans I-5 Improvement Plan (Plan) is to serve as a starting point for discussion with local approving agencies, the developer, and Caltrans on what may be acceptable to mitigate I-5 traffic impacts. It is not intended to serve as the only traffic analysis required, nor as a comprehensive list of options that will meet the mitigation needs of a project. Specific mitigation projects and proportional share fees will be determined and negotiated with lead agencies on a case-by-case basis.

### **Purpose of this Plan**

The Plan will serve as a high level implementation document for improvements to I-5 within Shasta County that will meet the needs of the traveling public, mitigate development impacts, and accommodate future growth. The costs associated with the projects (Table 2) are planning level estimates only. Actual project costs would be determined when project specifics are more fully identified.

The document does not meet CEQA-required criteria for "existing traffic plans and programs prepared by the cities and Caltrans that include guaranteed and secured funding sources" (see Tracy First v. City of Tracy, et. al., Court of Appeal, Third Appellate District, August 27, 2009). Neither does the comment-referred Caltrans I-5 Improvement Plan, Shasta County.

No evidence is documented in this comment that plans and guaranteed funding sources exist for any project-related impacts in local jurisdictions, (City of Redding, City of Anderson).

CEQA requires that when implementation of impact mitigation measures, absent plans and funding, must be by other than the lead agency, the impacts must be found to be based, as the PRDEIR did, significant and unavoidable.

The Department's disagreement with the PRDEIR's estimated internal trip capture rate is noted and incorporated in the EIR.

Although Caltrans Traffic Impact Study Guide requires that internal trip reductions only be considered when a proposed development contains both commercial and residential uses, the comment-referenced ITE Handbook includes no such requirement (p. 86: "...However, if the shopping center is planned to have out-parcel development of a significantly different land use classification or a very large percentage of overall GLA, the site could be considered a multi-use

development for the purpose of estimating site trip generation...” The comment-referenced ITE Tables 7.1 and 7.2 note 20% (p.m. peak hour) to 30% (daily) retail-to-retail internal trip reductions as typical.

The project traffic engineer had defined this development as including six such land uses: a discount club, a (retail) shopping center, a high-turnover restaurant, a fast-food restaurant, a drive-in bank and a home improvement store. He has applied the stated internalization rate (24%) to the development’s traffic generation rate for each such land use.

**Response 85.1H:** The comment is noted and incorporated in the EIR.

**Response 85.1I:** The comment regarding diverted-link trips is correct. Total project-related trips and peak hour trip volumes should be 22% less than assumed for all except I-5 main-line trips.

In review of the effects of this change on EIR evaluation of project impacts:

- Comparison of impacts based on level of service (LOS), volume-to-capacity ratio (V/C) change, traffic density for traffic volumes not including either diverted linked trip or internal capture rate deductions discloses only one roadway segment which would be differently evaluated, as non-significant from an LOS standpoint; Knighton Road – I-5 SB ramps to I-5 NB ramps.

This change is of no consequence as the mitigation measure needed to reduce this impact will be required by Mitigation Measures #3.12-2a and #3.12-2b to install the required lane conformation as intersection impact mitigation.

- Main-line I-5 calculations were correctly evaluated using internal capture rate and linked trips volumes.
- Knighton Road, I-5 to Churn Creek, calculations evaluating traffic operations adjacent to the TA site were, according to the project applicant’s traffic engineer, calculated using traffic volumes which were not adjusted for either linked trips or internal capture.

The CEQA impacts, and required mitigation measures of the project, are thus unchanged. The “fair share” costs to be assigned to the project must be modified to reflect the linked trip adjustments. This modification can be made either when the mitigation monitoring program is adopted or when the use permit agreement is entered into with the applicant. In either case, “fair share” calculations must then be made in accord with Shasta County Ordinance 665, Public Facilities Impact Fees Study, and the County’s Major Road Impact Fees Program, Regulation 91-115, A Resolution Adopting Fees for the South Central Regional Area.

Appendix V, submitted during PRDEIR review by the project applicant’s traffic engineer, provides detail regarding this summary response.

**Response 85.1J:** The comment is noted and incorporated in the EIR.

The comment statement that "...CEQA provides for mitigating to the existing conditions" is inaccurate. CEQA requires lead agency consideration of feasible mitigation measures which, when implemented, could reasonably be expected to substantially reduce or eliminate adverse significant impacts.

**Response 85.1K:** The comment is noted and incorporated in the EIR.

The data and analysis provide by the project traffic engineer does not correspond to the concerns expressed by Caltrans after recommended mitigation measures are implemented. Given the lack of correspondence between the conclusions reached by the traffic engineer and by Caltrans, Caltrans may wish to further analyze and document their concerns in a subsequent EIR or to undertake further discussion of the issue with the project applicant and his traffic engineer.

**Response 85.1L:** The comment is noted and incorporated in the EIR. It does, however, evaluate intersection delays and potential queuing problems of project-affected intersections (Appendix O, DEIR). Appendix A of the PRDEIR, page 3.12.65, and Figure 3.12-19 discuss and illustrate the critical 95<sup>th</sup> percentile vehicle queues adjacent to the TA truck site. The EIR traffic engineer did not consider further analysis to be essential.

**Response 85.1M:** The comment is noted and incorporated in the EIR. The traffic analysis and Appendices A through D of the PRDEIR do not support the comment's conclusions.

Please see Response 85.1K with respect to resolution of this issue.

**Response 85.1N:** The comment is noted and incorporated in the EIR.

Again, the alternative courses of action outlined in Response 85.1K would be appropriate with respect to the intersection design.

It would, pending the agreed resolution of appropriate interchange design, be speculative to postulate at this time whether amendment of the Public Facilities Impact Fee program will be required.

**Response 85.1O:** The comment is noted and incorporated in the EIR.

**Response 85.1P:** The comment is noted and incorporated in the EIR.

The differing conclusions of the project EIR traffic engineering consultants and Caltrans are acknowledged. The EIR, based on the EIR traffic engineering consultants' conclusions, correctly reflects the present and future impacts of truck traffic on Knighton Road and the Interstate 5 interchange.

Again, please see Response 85.1K with regard to the resolution of this issue.

**Response 85.1Q:** A comment letter from Travel Centers of America (Comment Letter 92) has been received and incorporated in the EIR. It is evident that further discussion regarding the project-proposed circulation would be helpful. It appears that, based on apparent current non-compliance with County-approved site access restrictions, resolution of the circulation pattern change needs may be achieved.

**Response 85.1R:** The comment is noted and incorporated in the EIR.

Please refer to Comment 85.1K with respect to the resolution of these expressed concerns.

**Response 85.1S:** The comment is noted and incorporated in the EIR.

Without speculation, it is unlikely that any of the alternative transportation subject matter referred to in this comment would affect the evaluation of the magnitude of the project's traffic impacts. Failure to adjust anticipated traffic volumes downward due to presumed customer utilization of other transportation modes make the current analysis more realistic and conservative.

**Response 85.1T:** The comment is noted, agreed, and thus incorporated in the EIR.

**Response 85.1U:** The comment is noted and incorporated in the EIR.

Appropriate physical mitigation measures are identified. With respect to the implementation of proposed mitigation measures for I-5 facilities and those located in other jurisdictions, the inadequacy of plans and guaranteed funding sources for I-5 improvements, and the lack of identified plans for and guaranteed impacted-facilities funding for such facilities in other jurisdictions, prohibits the imposition of project mitigation measures in each jurisdiction.

Please see Response 85.1G and Letter 97, Response 97E.

**Response 85.1V:** The comment is noted and incorporated in the EIR.

CEQA permits the use of fees as mitigation if the required physical mitigation measures to be implemented are identified and if the fee program provides, as does Shasta County's, for a method of calculating "fair share" (nexus) fee contributions. (See Response 85.1I)

**Response 85.1W:** The comment is noted and incorporated in the EIR.

**Response 85.1X:** Public Resources Code 21086 requires that, after considering the final EIR and when making the required findings thereon a lead agency shall adopt a mitigation monitoring program. That program shall require, monitor and provide for reporting thereon the timely implementation of project mitigation measures. The information derived therefrom, on this traffic-related project, shall be provided to Caltrans.

It will be the responsibility of Shasta County as the lead agency, to timely implement all CEQA-required mitigation measures to substantially reduce or eliminate significant impacts at all stages of project development. The monitoring program to be adopted will reflect this responsibility.

**Response 85.1Y:** Public Resources Code 21086 requires that, after considering the final EIR and when making the required findings thereon a lead agency shall adopt a mitigation monitoring program. That program shall require, monitor and provide for reporting thereon the timely implementation of project mitigation measures. The information derived therefrom, on this traffic-related project, shall be provided to Caltrans.

It will be the responsibility of Shasta County as the lead agency, to timely implement all CEQA-required mitigation measures to substantially reduce or eliminate significant impacts at all stages of project development. The monitoring program to be adopted will reflect this responsibility.

**Response 85.1Z:** The comment is noted and incorporated in the EIR.

The requested ramp metering will be considered as a mitigation measures, and such consideration will be reflected in the findings on EIR adoption.

**Response 85.1AA:** The comment is noted and incorporated in the EIR. Please see the PRDEIR and the responses thereto (Response 85.1I) for information regarding corrected traffic trips and Response 85.1B regarding Caltrans environmental review alternatives.

**Response 85.1BB:** The comment is noted and incorporated in the EIR. The PRDEIR provides analysis of project impacts on the overall capacity of the freeway. Response 85.1I discusses "fair share" calculations.

**Response 85.1CC:** The comment is noted and incorporated in the EIR. The traffic portion of the DEIR was, as requested, revised and recirculated. It is noted that Caltrans, as a commenting responsible agency, may submit to the County recommendations for feasible mitigation measures.

**Response 85.1DD:** The comment is noted and incorporated in the EIR. The County of Shasta looks forward to the opportunity to further review project impacts and mitigation measures with Caltrans.

**Response 85.1EE:** Please see Response 85.1BB.

**Response 85.1FF:** The comment is noted and incorporated in the EIR.

Appendices B and C of the PRDEIR provide the modeling and data deemed by the traffic consultant to be adequate as a basis for this analysis.

**Response 85.1GG:** The comment is noted and incorporated in the EIR.

The PRDEIR and its Appendices provide requested information.

**Response 85.1HH:** The comment is noted and incorporated in the EIR. The PRDEIR, and the response to Comment 85.1I further discuss this issue. The required redesign of the interchange to accommodate ramp lane increases is a design function, not an EIR requirement.

**Response 85.1II:** The comment is noted and incorporated in the EIR. Please also see the response to Comment 85.1I.

**Response 85.1JJ:** The comment is noted and incorporated in the EIR.

**Response 85.1KK:** The comment is noted and incorporated in the EIR.

The PRDEIR analyzes full build out of the project. It is not feasible to analyze all of the permutations of partial project development. It will be the responsibility of the County, as the lead agency, to schedule and require the timing of the mitigation measures which it can legally implement so that their implementation is in place to mitigate partial or full impacts. The County looks forward to further cooperation with Caltrans and with the Cities of Redding and Anderson to enable these jurisdictions to timely plan, fund and implement appropriate project-related mitigation measures.

**Response 85.1LL:** The comment is noted and incorporated in the EIR.

The PRDEIR provides the requested disclosure.

**Response 85.1MM:** The comment is noted and incorporated in the EIR.

The design of the interchange is beyond the scope of the EIR.

**Response 85.1NN:** The comment is noted and incorporated in the EIR.

The PRDEIR (Appendix A, page 3.12-11) includes Policy C-61 in its listing of pertinent General Plan policies.

The EIR recommends mitigation measures which will implement Policy C-61.

The implementation, whether by the County or by other affected agencies, of the recommended mitigation measures will mitigate the emergency access concerns expressed in the comment.

**Response 85.1OO:** The comment is noted and incorporated in the EIR.

The traffic consultant's evaluation of queuing potential is adequate for this environmental evaluation pending I-5 intersection design decisions. The Knighton Road segment adjacent to the TA site has, as a critical area, been definitively analyzed and mitigation measures to prevent excessive queuing are proposed in the PRDEIR.

**Response 85.1PP:** The comment is noted and incorporated in the EIR. Speculation as to such a required relocation, dependent presumably upon, in part, interchange design and cost considerations, is not a subject pertinent to the EIR.

**Response 85.1QQ:** The comment is noted and incorporated in the EIR.

The PRDEIR's analysis of Caltrans facilities utilizes this threshold.

**Response 85.1RR:** The comment is noted and incorporated in the EIR.

Appendix D of the PRDEIR provides further, field-derived, data regarding TA truck traffic utilizing the Knighton Road interchange.

**Response 85.1SS:** The comment is noted and incorporated in the EIR.

The PRDEIR recommends, but the County cannot implement, mitigation measures for this impact. The design (length) of the third lane at the interchange or the lengths of the I-5 merge and diverge areas are outside the required scope of the EIR. It is possible, but speculative, that ramp metering may be another feasible mitigation measure.

**Response 85.1TT:** The comment is noted and incorporated in the EIR. Please also refer to the response to Comment 85.1B.

**Response 85.1UU:** The comment is noted and incorporated in the EIR; it is, of course, correct.

**Response 85.1VV:** The comment is noted and incorporated in the EIR.

The County will, as noted in the PRDEIR, utilize Shasta County Ordinance No. 665 and Shasta County Board Resolution 91-115 as a basis for "fair share" calculations. It is not necessary for CEQA-level evaluation of project impacts and mitigation measures that "fair share" calculations be included therein. Please see the response to Comment 85.1I.

**Response 85.1WW:** The comment is noted and incorporated in the EIR.

CEQA case law directs the County to, and to document in its EIR project findings, determine that impacts to facilities or persons outside its jurisdiction be considered significant and unavoidable. Please see the response to Comment 85.1G.

The County will cooperate, to the extent legally possible, with Caltrans and the Cities of Redding and Anderson, to enable them to timely mitigate any impacts identified in the EIR to facility within their jurisdiction.

**Response 85.1XX:** The comment is noted and incorporated in the EIR.

It is evident that even a 46% reduction from the traffic volumes utilized in the DEIR, as analyzed in the PRDEIR, had little or no impact upon project impacts or the required mitigation measures.

**Response 85.1YY:** The comment is noted and incorporated in the EIR.

RECEIVED  
SHASTA COUNTY

LETTER 86

Harmony Gugino  
PO Box 649  
Shasta, CA 96087  
(716)622-7874  
[hgugino@gmail.com](mailto:hgugino@gmail.com)

DEC 16 2010

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

December 10, 2010

Shasta County Department of Resource Management  
1855 Placer Street  
Redding, CA 96001  
(716)225-5807

To the Shasta County Department of Resource Management:

This letter is in regards to *Knighton and Churn Creek Commons Retail Center*, a proposed development project in Churn Creek Bottom. As a local citizen, I object to the approval of this project. Some of my reasons for this are outlined below:

**Promote Healthy Communities**

- Understanding that not all agriculture is created equal, much of the agricultural operations in CCB are small organic parcels using rich soils (USDA class 1 and class 2), which support local livelihood and supply local community with fresh, healthy food

**Protect Water Quality and Availability**

- Protect permeable surfaces and water filtration

**Protect Character of the Area**

- Not all changes in a community's development are permanent but once something is gone, it can be hard to get back

**Promote Smart Growth**

- Plenty of opportunity in Shasta County for 'infill' development in current commercial zones
- This request for development encourages urban sprawl (including traffic congestion) and negative health concerns

~~I also support requests made by *Shasta County Citizens for Smart Growth*:~~

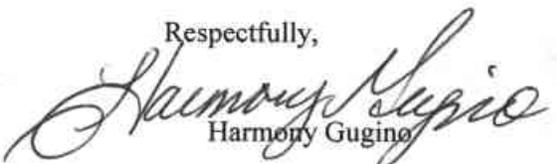
- Specified plan for the protection of Churn Creek Bottom for future generations
- Alteration of current tax revenue method in order to resolve contest between local municipalities and Shasta County

**Uphold Shasta County General Plan**

- "The County should develop a plan for the Clear Creek Bottom area with emphasis on maintaining and preserving a variety of long-range agricultural options."

Thank you for your time and consideration in this matter.

Respectfully,

  
Harmony Gugino

A

**Letter 86**    **Harmony Gugino**

**Response 86A:** The comment is noted and incorporated in the EIR.

It is noted that the opinions voiced do not relate to traffic, the subject of the PRDEIR.

RECEIVED  
SHASTA COUNTY

DEC 16 2010

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

Frederick R. Wilson  
P.O. Box 95  
Round Mountain, CA 96084  
Dec.14, 2010

ATTN. Lisa Lozier, Senior Planner

Dear Lisa,

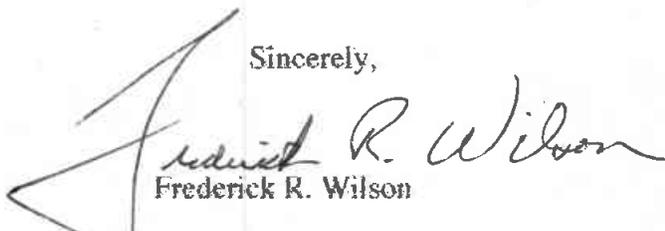
Per our conversation yesterday, I shall put my concerns regarding the traffic flow and the Churn Creek Commons Retail Center Project in a letter.

My hope is that in planning this project, somebody is looking down the road Fifty to a Hundred years and recognizes the impact this project is going to have on access to the airport.

I was a pilot for one of our major airlines for 26 years. In that time I witnessed the effect that airport growth had on the surrounding area. It would appear that most of the problems that were created were caused by lack of planning and zero foresight. Seeing all the growth made being associated with the airline industry an exciting place to be but it also brought to the forefront all the poor planning. The lack of foresight was evident at just about every major city. In Los Angeles where they had to buy a whole subdivision, to Denver, one of many, where they had to move the airport, the lack of foresight is evident. Every airport it seems has traffic problems. I have no idea how many hours I spent sitting in traffic trying to get to and from work. It could be argued that the Airport Planners did not have the ability to see into the future but with the aid of the computers we have today that should not be a problem.

Someday there may be a need for three lanes of traffic to and from the airport along Knighton Road and also down Airport Road. I would hope we do not make the same mistakes so many other cities have made.

Sincerely,

  
Frederick R. Wilson

530-945-9955

A

**Letter 87**     **Frederick R. Wilson**

**Response 87A:** The comment is noted and incorporated in the EIR. The issues raised, although important, lacked sufficient project-related specificity to permit a response.



**Shasta County**

Regional Transportation  
Planning Agency

1855 Placer Street • Redding, CA 96001 • (530)225-5654 • FAX (530)225-5667  
E-Mail [scrtpa@co.shasta.ca.us](mailto:scrtpa@co.shasta.ca.us) • HOME PAGE [www.scrtpa.org](http://www.scrtpa.org)

**Daniel S. Little, Executive Director**

January 11, 2011

Lisa Lozier  
Shasta County Planning Division  
1855 Placer Street  
Redding, CA 96001

RECEIVED

RMS 010024

JAN 14 2011

COUNTY OF SHASTA  
PERMIT COUNTER

Subject: Re-circulated Draft Environmental Impact Report (SCH# 2009012088)

Dear Ms. Lozier:

Thank you requesting Shasta County Regional Transportation Planning Agency (SCRTPA) comments on the Knighton & Churn Creek Commons Retail Center Draft Environmental Impact Report (DEIR) and the re-circulated traffic section. This letter supersedes our comments on the prior draft. The SCRTPA is statutorily responsible for inter-jurisdictional coordination, funding and planning of regional transportation needs.

A

The re-circulated traffic section has additional analysis. It concludes that 76% of project traffic will rely on Interstate 5 and identifies 40 significant project impacts to regional transportation facilities. The DEIR identifies mitigation for each impact. It appears that for 39 of the 40 impacts, the stated mitigation will not occur. This should be disclosed in a more straightforward fashion. The stated reason to not participate in mitigation is that "a guaranteed funding source for the identified improvements has not been identified, or secured."

As the region's transportation funding agency, we disagree there is not a "guaranteed funding source" "identified or secured" for mitigation improvements, particularly with respect to Interstate 5 (I-5) mainline. In fact, certain mitigation improvements identified in the DEIR will be constructed this year with \$23 million in secure, dedicated funding sources. Similar transportation projects will follow. Mitigation from major projects such as this is a recognized part of the solution, consistent with our transportation funding plans. The Vineyards project in Anderson is a recent example of an EIR approval that included I-5 mainline funding, and funding on county facilities.

Most of the transportation needs identified as mitigation in the DEIR are included in the attached list of plans and programs. All are viable due to secured funding sources and statutory financing authority available to the region, and the state. Dedicated gas taxes and bond revenues are two examples. Based on existing plans and programs backed by dedicated revenue streams, the needed mitigation projects identified in the DEIR will be built eventually. If, however, all projects with substantial regional traffic impacts are freed of the requirement to mitigate, the region's planned and programmed project needs will be significantly delayed for several years, if not decades.

B

Although many of the DEIR mitigations meet the test of having "guaranteed" and secure fund sources, this is nonetheless an unreasonable prerequisite to developer participation in traffic mitigation. For projects such as this that amend general plans to add substantial traffic, neighboring jurisdictions and

Caltrans cannot be expected to predict the change, let alone identify up-front, guaranteed and secured funding sources to mitigate all resulting impacts.

The DEIR states that the lead agency cannot guarantee construction of needed mitigation to facilities located "wholly or partly outside the jurisdiction of the lead agency." While this lack of direct control can be a basis to find an impact potentially significant and unavoidable, it is not a valid basis to avoid all responsibility to participate with Anderson, Redding, and Caltrans in efforts to mitigate. The DEIR provides current examples of where multijurisdictional mitigation is feasible: Shasta County currently collects fees to mitigate new development's impacts on Anderson, Redding and Caltrans facilities.

Feasibility determinations for extra-jurisdictional impacts should also be evaluated in the context of whether the mitigation is identified in local, regional, and state transportation plans and/or improvement programs. To assist you, we have attached a list of relevant plans and programs for which the SCRTPA is responsible. There are also several traffic improvement plans and programs prepared by the cities and Caltrans. This includes the "Caltrans I-5 Improvement Plan, Shasta County" which identifies I-5 improvement needs and funding sources. Our cursory analysis shows that most of the project mitigation determined not feasible is identified within one or more of these plans and funding programs.

B cont.

The DEIR shows "existing plus project conditions" would degrade the Knighton Road/I-5 and Cypress/I-5 interchanges to an unacceptable level of service. Mitigation was determined to be infeasible for the reasons discussed above. Existing plus project conditions, by definition, are direct impacts. Direct impacts should be mitigated by the project proponent. The DEIR logic used to dismiss mitigation of cumulative impacts is even more tenuous when applied to dismiss mitigation for direct impacts.

The DEIR applies Caltrans thresholds of significance standards to I-5 mainline. Consistent with this, the DEIR needs to apply the same standards to all interchanges since they are also owned and operated by Caltrans. The Caltrans level-of-service threshold is LOS D, not LOS E, unless otherwise negotiated.

C

The original DEIR included the project percentage fair share contribution to mitigate impacts. The re-circulated DEIR, for many impacts, instead refers to payment of "fair share" fees through existing fee programs. The DEIR needs to demonstrate how payment of these fees equate to a fair share under CEQA. This can be done with an estimate of the fees paid toward said improvements compared to the actual fair share cost of those same improvements as identified through the DEIR traffic analysis.

D

The DEIR states that cumulative 2030 traffic conditions are based on the SCRTPA Travel Demand Model. It states that changes were made to the SCRTPA model; however, the lead agency has refused to allow reviewing agencies to view these changed inputs. This is inconsistent with the SCRTPA's current model user agreements. The information should be disclosed and meaningful opportunity provided for public comment.

E

Thank you again for the invitation to comment.

Sincerely Yours,

  
Dick Dickerson, Chairman  
Shasta County RTPA

Attachment

## **Shasta County Regional Transportation Plans and Capital Improvement Programs:**

1. Interstate 5 Transportation Concept Report  
<http://www.dot.ca.gov/dist2/planning/conceptrpts.htm>
2. Shasta County 2010 Regional Transportation Improvement Program  
[www.scrtpa.org/RTtips.html](http://www.scrtpa.org/RTtips.html)
3. 2010 Federal Transportation Improvement Program  
[www.scrtpa.org/RTtips.html](http://www.scrtpa.org/RTtips.html)
4. 2010 State Transportation Improvement Program  
[www.catc.ca.gov/programs/STIP/2010 Orange Book.pdf](http://www.catc.ca.gov/programs/STIP/2010%20Orange%20Book.pdf)
5. California Corridor Mobility Improvement Account Program  
<http://www.catc.ca.gov/programs/cmia.htm>
6. Shasta County Interchange Improvement Study, Final Report (available at RTPA office)

**Letter 88: Dick Dickerson, Chairman, Shasta County Regional Transportation Planning Agency**

**Response 88A:** The comment is noted and incorporated in the EIR.

**Response 88B:** The comment is noted and incorporated in the EIR.

The County respectfully disagrees with the commenter, and finds in accord with CEQA case law project-related impacts outside of Shasta County's jurisdictions to be significant and unavoidable. (Please see the response to Comment 85.1G.) A listing of projects and possible funding sources for the construction of unspecified projects is insufficient to qualify as "existing traffic plans and programs prepared by Caltrans and the cities that include guaranteed and secured funding sources."

**Response 88C:** The comment is noted and incorporated in the EIR.

The mitigation measure would be unchanged by a change in the Caltrans facilities LOS threshold of significant standards from LOS E to LOS D.

**Response 88D:** The County will, as noted in the PRDEIR, utilize Shasta County Ordinance No. 665 and Shasta County Board Resolution 91-115 as a basis for "fair share" calculation. It is not necessary for CEQA-level evaluation of project impacts and mitigation measures that "fair share" calculations be included therein. Please see the response to Comment 85.1I.

**Response 88E:** The comment is noted and incorporated in the EIR. It is not, however, a CEQA issue.

RECEIVED  
SHASTA COUNTY

January 24, 2011

JAN 26 2011

Lisa Lozier  
Shasta County Planning Division  
1855 Placer St., Ste. 103  
Redding, CA 96001

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

Subject: Knighton Retail Center Draft Environmental Impact Report (DEIR)

Dear Ms. Lozier

As a resident of Churn Creek Bottom since 1961 and a lifetime resident of Redding, I am very concerned about plans to develop a retail center at Knighton Road and Churn Creek Roads. The proposed site is a part of an agricultural neighborhood where farming and ranching are a way of life and always has been. My home is situated less than 1 1/4 miles from the proposed site. I am vehemently opposed to this "mall" being forced down our throats as was the truck stop and freeway.

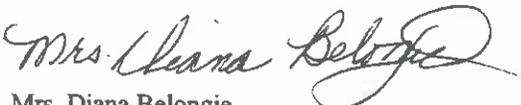
When my late husband and I moved to the Bottom in 1961 the site proposed for the retail center was a working ranch belonging to Crystal and Howard Thatcher. Howard was also the Chevrolet dealer in Redding, along with Mr. Lowden. This area has a lot of history and none of it retail. The first mistake was to allow the freeway through the bottom whereas there were other areas to build it without destroying good farm land, however, due to some folks who felt money was more important than preserving the rural lifestyle, very few of the residents knew about it until too late. The second error was to allow the truck stop to build. There have been many problems since it was built including noise, more traffic, more pollution, prostitution and lower property values for residents. The proposed acreage could be used to grow badly needed livestock feed. As it is, hay prices are way up as much of it has to be brought in from other areas.

I believe the removal of prime agricultural land encourages urban sprawl and soon we will have nothing but drained wells due to the added water needed for such a project and ground water pollution due to inadequate sewer and water services. Another concern is safety as the proposed main entrance from Knighton Road would be located very close to the Northbound I-5 off ramp. I understand that it is also proposed to widen Knighton Road be widened to multiple lanes in each direction. This would entail taking more prime land and would create a major thoroughfare to Airport Road. Cars are already speeding on that road since Knighton was put through to Airport and would be worse if widened. As for Churn Creek Road, there are times now that I can hardly get out of my street due to added traffic, including large trucks.

Another point is why do we need another mall roughly twice the size of Mt. Shasta Mall when there are so many empty store spaces all over town, including in the Mall ? I cannot understand why anyone would want another mall in that location especially since there are the Anderson Outlets a very few miles to the south and the Mt. Shasta Mall to the north. Businesses are closing in the existing mall, two just this past week.

Thank you for your consideration in this important matter.

Sincerely,



Mrs. Diana Belongie  
19339 Smith Road  
Redding, CA 96002

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B

C

**Letter 89: Diana Belongie**

**Response 89A:** The comments are noted and incorporated in the EIR.

**Response 89B:** The added traffic resulting from the project necessitates widening of Knighton Road and Churn Creek Road as traffic congestion mitigation measures. Such widening will not necessarily increase traffic speeds.

The location of the proposed Knighton Road project entrance with respect to the northbound I-5 off ramp has been analyzed in Appendix D of the PRDEIR and appropriate mitigation measures, including TA site access, have been proposed.

**Response 89C:** The comments are noted and incorporated in the EIR.

Shasta County Department of Resource Management,  
Planning Division  
1855 Placer St., Suite 103  
Redding, CA 96001

RECEIVED  
SHASTA COUNTY

Attention: Lisa Lozier, Senior Planner

JAN 28 2011

24 January 2011

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

This letter contains comments and concerns regarding the traffic aspects of the DEIR for the development at I-5/Knighton Road.

1. The project calls for 4 access points along Churn Creek Road north of Knighton. This will negatively impact this narrow, rural road that has no shoulders, no bike lanes, no walkways, a narrow bridge, and driveways of individual residences directly entering the roadway.

A

2. There is mention of installing a traffic signal in the Victor/Rancho Road/Churn Creek Road area. This is certainly an indication of the realization that the proposed project will have far reaching effects. However, it is my understanding that the City of Redding has plans for a roundabout at this very same location, and its construction will come along with development in the area, especially to the east. It doesn't seem that the two parties are communicating.

B

3. The project plans to have all trucks exit the existing truck stop onto Pacheco Road. This would require breaching the existing sound barrier, which was placed there to protect the

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neighbors and the school. Pacheco Road would require major improvements and widening to handle the big trucks. It would also put neighbors, parents, and students in close proximity to the trucks; there are houses and a school drop-off point to the south of the proposed exit whose only access would be to pass the truck exit. Is there a plan to deal with the noise generated by the trucks exiting onto Pacheco Road? They will be on the wrong side of the sound barrier. It appears that a big truck wishing to turn to the east from Pacheco Road onto Knighton will have a very difficult time of it as the position of the stoplight will make for a tight turn; I suspect that the truck would need a great deal of the width of Knighton which would be a hazard for west-bound traffic.

C cont.

4. Has the Truck Stop exit plan been approved by the property owners affected? Who is going to pay for the necessary improvements?

D

5. The proposed #2 entrance (on the east) to the truck stop designed for those trucks that miss entrance #1 will place trucks trying to reach the fueling station in opposition to trucks trying to exit to Pacheco Road. The circulation pattern of the truck stop will be disturbed.

E

6. An 18 wheeler is approximately 70-80 feet long. The distance between the signal light at Churn Creek/Pacheco/Knighton Roads and the proposed signal light on Knighton that would service both the auto/truck traffic into the truck stop, auto traffic out of the truck stop, and the main entrance to the project is approximately 250 feet. Trucks will stack up while waiting to turn west onto Knighton, the light will turn green, and multiple big-rigs will immediately meet another signal. The potential exists for major plugging of Knighton Road and its access points. It is not hard to imagine the negative impact that a mixture of

F

trucks, cars, school buses, school traffic, through traffic, shoppers, R'vers, emergency vehicles, bicycle riders, and pedestrians will have on that short stretch of road.

F cont.

7. It seems to me that this is a classic case of the "cart before the horse." The necessary infrastructure to support this proposed large project is not in place, and the reasoning of building infrastructure when the funds are available in the future is not at all reassuring; there are no guarantees offered here.

G

George Cole  
7399 Dilley Lane  
Redding, CA 96002



530-221-3266

**Letter 90: George Cole**

**Response 90A:** The comments are noted and incorporated in the EIR.

Proposed project mitigation measures include the widening of Churn Creek Road.

**Response 90B:** Since the County of Shasta cannot implement proposed project mitigation measures in the City of Redding, the City may elect to substitute a roundabout if it so chooses.

**Response 90C:** Please see the response to Comment 96A with respect to truck impacts on traffic increments, and the Noise section of the DEIR.

**Response 90D:** Please see Comment Letter 85, Response 85.G.

**Response 90E:** The PRDEIR, Appendix D, addresses this issue.

**Response 90F:** The PRDEIR, Appendix D, addresses this issue.

**Response 90G:** Under CEQA, the County of Shasta must timely implement its mitigation measures prior to project construction. This issue will be addressed in the County's mitigation monitoring program.

JAN 26 2011

Shasta County Department of Resource Management  
Planning Division  
1855 Placer St #103  
Redding CA 96003

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

To whom it may concern:

Through the years, you have been hearing several citizens objecting to any projects at the Knighten Road intersection.

Many of the complainers are either new comers who have relocated from the cities down south, Sierra Club members or renters who don't pay property taxes. I suppose the reason you haven't heard from those of us who are "old timers" is because we have busy lives and don't have the time to complain. A lot of us would like to retain the status quo, but we have enough common sense to know that the bare property is doing nothing except costing tax dollars for the owners of the property, and that just isn't fair. If the objectors are so adamant about NO CHANGES, then they should form a pool and buy the property.

A

In this economy we certainly need all the tax dollars and jobs we can get from sources other than our home owner property. So let the owner develop the property. It's the only logical answer. Of course there will be a certain amount of inconvenience to us, it won't kill us.

Charles & Jo Russell

19646 Clover Rd  
Redding CA 96002  
530-222-3172

**Letter 91: Charles & Jo Russell**

**Response 91A:** The comment is noted and incorporated in the EIR. It does not directly address the traffic issues which are the subject of the PRDEIR.



*Kyle Raynor*  
Real Estate Manager  
Phone: (617) 219-1424  
Fax: (617) 969-4697  
*Raynor.Kyle@iatravelcenters.com*

**Sent Via Federal Express**

January 26, 2011

Shasta County  
Department of Resource Management  
Planning Division  
1855 Placer St., Suite 103  
Redding, CA 96001  
Attn: Lisa Lozier

**RECEIVED**  
SHASTA COUNTY

**JAN 28 2011**

**DEPT OF RESOURCE MGMT  
PLANNING DIVISION**

RE: Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

By way of introduction, I am the Real Estate Manager for TravelCenters of America (“TA”), which operates the Redding Travel Center located at 19483 Knighton Road, Redding, California and is located on the opposite side of Knighton Road from the proposed Hawkins Companies (“Hawkins”) development. Please accept this letter as TA’s comments on the re-circulated Traffic and Circulation Section of the Draft Environmental Impact Report and in addition to the comments to the full Draft Environmental Impact Report as presented in my December 28, 2009, letter to the Department of Resource Management, a copy of which is attached for your reference.

A

The re-circulated Traffic and Circulation Section does attempt to address the issues TA previously raised with regards to the proposed changes to our facility’s access and traffic circulation. The solution presented by Hawkins would have westbound trucks access our facility using the car entrance and then using a slip lane to use the diesel island. This proposal is unacceptable to TA as it would result in an unsafe condition within our parking lot due to the commingling of truck and car traffic in a congested and tight area. Under the proposed traffic circulation plan cars using our facility will already be inconvenienced due to the reduced traffic flow as a result of the loss of one driveway. The addition of a commercial vehicle trying to navigate through cars waiting to use the gasoline offer will cause vehicles to back up onto Knighton Road.

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A more practical, although still inadequate, solution for westbound trucks to access our facility would be to have them use the same driveway on Pacheco Road that will serve as the

only truck exit in the plan presented by Hawkins. These trucks still would not be able to access our diesel island but this plan would provide safer access for these customers to our facility.

B cont.

Although TA is not in favor of the proposed development, in the event the County approves the draft Environmental Impact Report TA respectfully requests that the County condition such approval with the requirement that Hawkins implement, at no cost to TA, all of the traffic mitigation measures identified in the re-circulated Traffic and Circulation section on Knighton Road between the southbound I-5 on and off-ramps and Pacheco Road, including the improvements to TA's driveways and upgrading of Pacheco Road to accommodate commercial vehicles.

C

TA opposes any proposal that will overburden the existing roadways and inconvenience the surrounding businesses and residents without adequate upgrades to the traffic system being made before the retail center is constructed and traffic congestion becomes unbearable. TA reserves all rights available to it at law and in equity.

D

Sincerely yours,

  
Kyle Raynor



TRAVELCENTERS  
OF AMERICA LLC

*Kyle Raynor*  
*Real Estate Manager*  
Phone: (617) 219-1424  
Fax: (617) 969-4697  
*Raynor.Kyle@tatravelcenters.com*

December 28, 2009

Shasta County  
Department of Resource Management  
Planning Division  
1855 Placer St., Suite 103  
Redding, CA 96001  
Attn: Lisa Lozier

RE: Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

By way of introduction, I am the Real Estate Manager for TravelCenters of America ("TA"), which operates the Redding Travel Center located at 19483 Knighton Road, Redding, California and is located on the opposite side of Knighton Road from the proposed Hawkins Companies ("Hawkins") development. Please accept this letter as TA's comments on the proposed Hawkins development.

The Redding Travel Center has been in operation for over 30 years and has provided employment opportunities for Shasta County residents in addition to contributing substantial tax revenue for the County in the form of sales, fuel, excise and property taxes. The Hawkins development as proposed will result in the loss of business to TA and unnecessary inconveniences to its neighbors.

The Hawkins development proposes to move TA's access points and restrict trucks heading westbound on Knighton Road from turning left into our facility preventing those customers from accessing our diesel island. TA's facility was designed so that all of our trucking customers would enter through our western-most entrance thereby allowing customers interested in refueling to enter the diesel island directly.

Hawkins proposes to turn TA's current truck exit into a right-in only movement. By removing an exit movement from the eastern-most access point it is likely TA will lose use of most, if not all, of the truck parking spaces along the eastern property line.

E

In order to accommodate its retail center, Hawkins proposes shifting all of TA's exiting truck traffic onto Pacheco Road, which currently carries mostly residential traffic. TA is concerned with the ability of Pacheco Road to handle commercial traffic, which is not addressed in the Hawkins proposal. The Hawkins plan also does not address the issues related to diverting commercial traffic to a residential road adjacent to a school.

The Hawkins proposal leaves TA with a number of questions and comments including the following:

1. Will Hawkins or the County compensate TA for the takings and resultant required improvements if the Hawkins plan is approved?
2. What safety measures is Hawkins proposing to counter any safety and traffic issues created on Pacheco Road as a result of the redirected commercial traffic?
3. TA was required to install sound walls and landscaped screening along Pacheco Road and is concerned that its business will be burdened by increased visual and noise screening requirements as a result of the redirected traffic flow onto Pacheco Road. Does Hawkins propose to install enhanced screening along Pacheco Road so as to prevent future problems with residents along the road?

TA opposes any proposal that requires the relocation of its driveways and reserves all rights available to it at law and in equity. In addition, TA is very concerned that the Hawkins development has not adequately taken into consideration all of the adverse effects its proposal will have on the existing businesses and residents of Shasta County and, at a minimum, respectfully requests that Shasta County require that these effects be addressed by Hawkins.

Sincerely yours,



Kyle Raynor

E cont.

**Letter 92: Kyle Raynor, Real Estate Manager, Travel Centers of America**

**Response 92A:** The comments are noted and incorporated in the EIR.

The commentor's identity and authority to comment for Travel Center of America (TA) are acknowledged.

**Response 92B:** The commentor's opinion is acknowledged. However, Appendix D of the PRDEIR notes that commingling of car and truck access is already occurring at the TA site, and postulates that the proposed revision of site access will reduce this problem.

Please see response to Comment 85.1Q.

**Response 92C:** The PRDEIR proposes implementation of the described mitigation measures.

Please see response to Comment 85.1Q.

**Response 92D:** The comment is acknowledged.

**Response 92E:** The CEQA/traffic-related comments in this prior, December 28, 2009 letter to the County, have been addressed in the responses to the comments in TA's letter of January 26, 2011.

January 27, 29011

LETTER 93

Shasta County Dept of Resource Mgmt  
Planning Div  
1855 Placer ST  
Ste 102  
Redding CA 96001

RECEIVED  
SHASTA COUNTY

JAN 28 2011

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

Linda Schreiber  
5481 Balls Ferry Rd  
Anderson, CA 96007

Dear Sir,

I am writing in regards to the proposed development of the Knighton Road area, the Knighton & Churn Creek Commons Retail Center.

I am opposed to this project. My reasons are:

1. This is prime agricultural area that should be left for agricultural use, and not be covered with asphalt and cement.
2. This project will only contribute to urban sprawl.
3. This development is not a local business venture. And our too many local businesses and buildings are going empty.
4. This will cause congestion for commuters within Shasta County already aggravated by work hour slowdowns.
5. This is a beautiful, scenic area and will be marred by all the building.
6. There are many animals, plant and bird life that will endangered or displaced.
7. The air will be filled with more pollutants from automobiles and trucks. Our air must be protected.
8. There will be runoff from roads and related structures that will be unhealthy for the environment.
9. Shasta County does not have adequate mass transit to make this a practical site to do business.
10. This does not appear to me to be consistent with the Shasta Forward project results.

I am a home owner and have been a resident of Shasta County since 1945. I am deeply concerned with air and water quality and the plight of animals caught in urban sprawl. I value the beauty of our 'country' atmosphere and shudder to think of losing the pastoral beauty of Churn Creek Bottom. Please reject this project.

Thank you for considering my objections.

Sincerely,  
Linda Schreiber



A

**Letter 93: Linda Schreiber**

**Response 93A:** The comments are noted and incorporated in the EIR. It is the objective of the proposed mitigation program to reduce traffic congestion.

LETTER 94

RECEIVED  
SHASTA COUNTY

January 27 2011

Lisa Lozier, Senior Planner

JAN 28 2011

Shasta County Planning Division

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

1855 Placer St Suite 103

Redding, CA 96001

Subject: Knighton Road / Churn Creek Commons Retail Center Project at I-5

Dear Ms Lozier

We are 45 year residents of Churn Creek Bottom. We live less than one mile from the proposed project site.

We wrote in opposition to the Auto Mall project that was perhaps one of the most poorly planned and executed projects proposed for development in the history of Shasta County. The economic models proposed were nothing less than fraudulent at the time but are evidence of how little integrity the development process actually enters into the evaluation of responsible development. Had this "Auto Mall" been approved we would now be talking the "Churn Creek Auto Mall Junkyard".

Some of just several reasons we oppose the "Churn Creek Commons Retail Center" are:

**GENERAL COMMENTS**

- The economic feasibility of the project is highly questionable, and can simply be defined only as highly speculative at best. How many square feet of commercial space is available in the Shasta County communities? How much within the City of Redding? If any has a doubt as to the economic health of the commercial and rental markets in Redding, just take a quick drive.
- The simple basic land use requirement of consideration of the highest and best use of land concept is ignored. Agriculture land use that exists in Churn Creek can not be replaced once covered with buildings, pavement and septic tanks and huge leach fields.
- The 6 acres of the currently zoned "Commercial" is now proposed for expansion to a total of ***NINETY TWO acres of commercial ( PD )*** that would require an amendment to the general plan. Current zoning of A-cg and A-1 would be ignored, counter to the desires of the vast majority of local residents, many who worked for many years to develop a land use plan for the bottom compatible with life style desires of small residential / agriculture uses.
- There ***is NO*** municipal infrastructure on site for sewer, waste water or storm water drainage. An 18 acre "open space buffer" is **NOT** adequate to protect the ground

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water basin from contamination and contain water supply and waste water facilities required to serve the commercial development proposed. The high water table that exists in the area is well know and should not be casually ignored in the EIR. Projections and issues identified in the DEIR from some of the previous Quadnopf reports were inadequate and remain totally unrealistic and unacceptable, even though essentially repeated again in this EIR .

A cont.

## TRAFFIC AND CIRCULATION

The " new information " that is being recirculated is simply an inadequate rehash of the " old information " that was proven to be not only inadequate but misleading and inconclusive.

B

- The proposed widening of the I-5 overpass, portions of Churn Creek, Knighton Rd and signalization do **NOT** address the constraints remaining on Churn Creek Road north of the project, on Knighton Road east of the project and the impact of ingress and egress to the project site **and the Truck Stop**. To dream that all traffic entering and exiting the project will remain only on the widened, signalized access points is an unrealistic dream.
- The existing Churn Creek roadbed is in the exact location, with the same right of way width and grade that it has occupied for more than nearly 150 years from the horse and buggy days. It is incredibly considered to be "acceptable" for not only existing traffic, but now the addition of occupants and public access to 740,000 acres of commercial, retail, restaurants, recreation activities, fuel service and entertainment facilities !
- The existing two lanes on Churn Creek between Knighton, Rancho Rd and South Bonnyview are already seriously overburdened as evidenced by the number of accidents and daily conflicts. More car, truck, big rigs traffic will mean more noise, pollution and traffic collisions ! Irrespective of relatively minor improvements , traffic congestion will be disastrous and dangerous.
- The proximity of Pacheco School to the congestion associated with the increase in truck, car, big rigs and bus traffic can not be understated. The location of Pacheco School was one of the primary reasons the designation of "C" was limited to a maximum of 6 acres at the time the Churn Creek General Plan was approved . The Redding Police Dept already responds to over 1000 service calls each year for vehicle theft, assaults, disturbances and traffic issues at the truck stop which has the unfortunate reputation as **THE** drug transfer site of the North State. The increase in crime and traffic issues will be compounded many times over with the build out of this project.
- Economic feasibility of the project is seriously questioned. We all know how flawed and unrealistic projections of fantasy were presented in support of the Auto Mall and how the infamous "Churn Creek Auto Mall Junk Yard " of today would have been such a

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disaster if it had been approved. Now the same unrealistic financial projections are forced upon the Board with expectations that the "honesty and integrity" of all the financial projections and analysis will result in a self centered belief it will benefit the development advocates of the community.

E cont.

Shasta County planners and Board members can not continue to allow development in the County where adequate infrastructure is not available. An impasse with the City of Redding and in ability to work together to provide adequate infrastructure sharing agreements may appear to be acceptable to the County to just "go it alone", but is unacceptable to the public of Shasta County. Projects like this massive project as proposed should only be located where infrastructure is **CURRENTLY** available, and where public support, adequate technical, and planning staff capability exist. In our opinion that capability, development expertise and experience should exist within the agency involved in planning, and administering one of the largest projects of this nature proposed in the area.

F

This project should be located only where those elements exist and help to assure projects will be successful—on Oasis Road within the City limits of Redding !

Questions of what jurisdiction within the County should gain the tax benefits of a project should not play a role in the location of projects and should not be a factor in the political process. The taxpayers and residents of the entire County need to be convinced this is just not a selfish jealous political fight between two political entities who can't seem to work together for the ultimate benefit of all. We should expect decisions to be made on the basis of good land management and planning policies for the benefit of **ALL** Shasta County residents.

G

Sincerely

  
Alan Hill

  
Bev Hill

8057 Churn Creek Rd

Redding, CA 96002

**Letter 94: Alan & Bev Hill**

**Response 94A:** The comments are noted and incorporated in the EIR.  
The comment does not address the traffic issues which were the subject of the PRDEIR.

**Response 94B:** The extent of additional data and analysis in the PRDEIR is summarized in Chapter One, Section 1.2 and detailed in Chapter Two.

**Response 94C:** The PRDEIR finds Churn Creek Road to operate at acceptable Levels of Service (LOS) at existing plus project, and cumulative traffic loadings.

**Response 94D:** The comment is not directly related to the traffic issues analyzed in the PRDEIR.

**Response 94E:** The comment is not related to the traffic issues analyzed in the PRDEIR.

**Response 94F:** The comment is not directly related to the traffic issues analyzed in the PRDEIR.

**Response 94G:** The comment is not directly related to the traffic issues analyzed in the PRDEIR.

RECEIVED

JAN 31 2011

COUNTY OF SHASTA  
PERMIT CENTER



Citizens for Smart Growth Shasta County  
1441 Liberty Street, Suite 206  
Redding, CA, 96001  
WWW.ShastaSmartGrowth.org

January 27, 2011

Shasta County Dept of Resource Management  
Planning Division  
1855 Placer St.  
Redding, CA 96001  
Attn. Ms. Lisa Lozier, Senior Planner

**Subject:** Knighton and Churn Creek Commons Retail Center traffic and EIR impact.

Dear Ms. Lozier:

Citizens for Smart Growth is a collaborative of Shasta County residents many with expertise in health, city planning, engineering, architecture and other development related matters. We are responding to your request for comments on the Knighton and Churn Creek Commons Retail Center draft EIR.

The concerns expressed in the draft EIR Knighton and Churn Creek Commons Retail Center dramatically exceed the concerns of the previously planned Automall a project rejected by the Shasta Board of County Supervisors. After reviewing this specific draft EIR, we conclude that: 1) development goes against the Shasta County General Plan. 2) the development negatively impacts local residents and agriculture land owners. 3) Knighton and Churn Creek Commons Retail Center would cause unacceptable traffic gridlock.

**Aesthetics:**

Knighton and Churn Creek Commons Retail Center would degrade the existing scenic rural character along 1-5 that is important to the entire community. Knighton Road north is the "Gateway" to Redding. The residents and property owners in the Churn Creek bottom in addition to many citizens in Redding and Anderson, wish to retain its agricultural nature. This area has been protected by the Shasta County Board of Supervisors for the past 30 years.

A

B

**Agricultural Resources:**

The Churn Creek Bottom Knighton and Churn Creek Commons Retail Center site has rare Class 1 soil that these developers wish to pave over with 3,000,000 sq. feet of asphalt and 740,000 square feet of commercial building. We see no mitigation that would offset this planned development.

C

**Hydrology and Water Quality:**

Developments of this size and scope are normally serviced by infrastructure that provides sewer, water, and storm water runoff. This location in Shasta County has none of these existing services.

D

**Transportation and Traffic:**

The DEIR describes dramatic increases in traffic delays at various locations associated with the Knighton and Churn Creek Commons Retail Center. Levels of service will fall below the acceptable rating of "C" to unacceptable ratings of "F" on weekday afternoon and on Saturdays. Essentially, the report predicts traffic gridlock in this location.

E

If a major six-lane expansion of Knighton Road is built over I-5 it is unclear in this report what the county and tax payers' costs will be. The report is unclear what are the developer's responsibilities will be. The study is flawed by not adequately addressing the traffic safety for the local Pacheo school and the big rigs coming in and out of the truck stop.

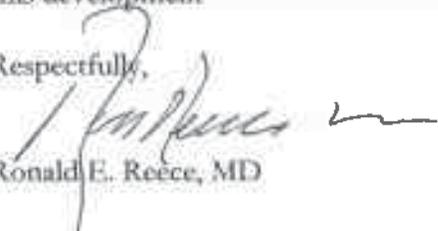
F

**Summary**

Citizens for Smart Growth urges the County Planning Commission and the Board of Supervisors to revisit the flawed report as it does not adequately address the negative impact this development will have on Knighton Road and Churn Creek Bottom.

G

Respectfully,

  
Ronald E. Reece, MD

**Letter 95: Ronald E. Reece, MD, Citizens for Smart Growth Shasta County**

**Response 95A:** The comments are noted and incorporated in the EIR.

Other than a generalized comment regarding the likelihood of traffic gridlock, the comments do not address the subject of the PRDEIR, traffic impacts.

**Response 95B:** See Response 95A.

**Response 95C:** See Response 95A.

**Response 95D:** See Response 95A.

**Response 95E:** The PRDEIR notes that Shasta County's acceptable Level of Service (LOS) is E. Caltrans' acceptable LOS is C/D. When mitigated, as proposed by the PRDEIR, the project will result in acceptable levels of service, not "gridlock" (LOS F).

**Response 95F:** The PRDEIR defines in detail the manner in which County-implemented mitigation measures will be affected, principally through the payment of impact fees in accord with PRDEIR-cited County programs. The implementation of PRDEIR-proposed mitigation measures in other jurisdictions is in accord with CEQA, the responsibility of those jurisdictions.

Project impacts to Pacheco School are evaluated in the DEIR. "Big Rig" traffic concerns with respect to the TA truck stop are evaluated in Appendix D of the PRDEIR.

**Response 95G:** The comment is acknowledged.

RECEIVED

January 27, 2011

JAN 28 2011

COUNTY OF SHASTA  
PERMIT COUNTER

Lisa Lozier, Senior Planner  
Shasta County Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001

Re: Comments on Partially Re-circulated Draft Environmental Impact Report for Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

I write to comment on the Partially Re-circulated Draft Environmental Impact Report (RDEIR) for the Knighton & Churn Creek Commons Retail Center (Project).

The RDEIR does not address the intersection of Knighton Road and Mohegan, although it does acknowledge that the Project will result in substantial increases in traffic at the Knighton Road/I-5 interchange, as well as on existing surface streets and regional circulation facilities. A site visit to this intersection will show that an unsafe condition exists at the present time for vehicles traveling west on Knighton Road trying to slow enough to turn right onto Mohegan. The design of Knighton Road allows for speeds high enough that during peak traffic hours it is not safe to slow to make a right turn safely without fear of being rear-ended. As admitted in the RDEIR, the proposed shopping mall would significantly increase traffic thereby exacerbating this already dangerous situation.

A

The RDEIR includes data that dates back as far as 6 years. Traffic volumes as old as 2004 are not likely to accurately reflect current traffic conditions and should be updated. Apparently insufficient time was spent to research traffic peak periods as I believe the peak hours have been miscalculated. Also, assumptions used to estimate internal trip reductions are inconsistent with standard methods developed by the Institute of Transportation Engineers.

B

The RDEIR states the Project would cause Levels of Service "F". No one should be allowed to build a project that admits to creating a Level of Service "F". This is unacceptable.

C

The Project indicates a requirement to reconfigure the driveways at the TA truck stop. As such, the proposed improvements at the truck stop must be included in the project

D

by the owner of the proposed project. As such, there is no way to know if permission will be granted by the owner of the truck stop to allow the identified improvements.

D cont.

Similarly, the RDEIR discusses mitigation measures to be taken at nearby I-5 interchanges that fall within the jurisdiction of the City of Anderson and the City of Redding, not the County of Shasta. Therefore, there is no way for Shasta County to enforce these measures.

E

The RDEIR does not adequately identify funding sources for the necessary freeway interchange improvements, nor when fee programs will be implemented. Given the current economic climate for new development, and depending on the current financial status of those fee programs, mitigation measures for the proposed project may not be implemented for years after occupancy is allowed at the proposed project. This will result in the project causing severely congested conditions and safety hazards.

F

The RDEIR indicates the proposed project will create significant impacts at the Northbound and Southbound I-5 off-ramp intersections at Knighton Road. Deferring signalization of these intersections will result in significant congestion at those locations. This congestion could, in turn, result in vehicle queuing on the I-5 off-ramp that extends to the freeway mainline. Vehicle queuing that extends to the freeway mainline creates a severe traffic hazard and, again, is unacceptable.

G

For many reasons this project should be rejected. It will increase traffic counts, reduce the Level of Service at some locations to unacceptable. Full funding for the required improvements is not currently available, thus going forward with this project without securing the funds necessary to mitigate these issues exacerbates the LOS and safety conditions.

H

No development should occur at the Knighton Road/I-5 intersection prior to completion of all necessary infrastructure.

I

Sincerely,



Brenda Haynes  
19681 Osceola Court  
Redding, CA 96002

**Letter 96: Brenda Haynes**

**Response 96A:** The comments are noted and incorporated in the EIR.

The PRDEIR details both project-related traffic increases (see Comment Letter 85, Response 85.1I) and proposed mitigation measures for Knighton Road.

**Response 96B:** Current traffic data and field traffic counts at peak hours supported the PRDEIR's analyses. The internal trip reductions used are, as discussed in Letter 85, Response 85.1H, consistent with those described in the Institute of Transportation Engineers (ITE) Trip Generation Handbook.

**Response 96C:** The PRDEIR proposes project mitigation measures designed to prevent Level of Service (LOS) F traffic conditions.

**Response 96D:** Please see Comment Letter 85, Response 85Q and Letter 92.

**Response 96E:** The comment is correct.

**Response 96F:** The comment is speculative; a reasoned response cannot be made.

**Response 96G:** The PRDEIR proposes mitigation measures to correct the cited conditions. The County does not have the authority to require implementation of the proposed measures.

**Response 96H:** The comment is acknowledged.

**Response 96I:** The comment is acknowledged.

# CITY OF REDDING



**DEVELOPMENT SERVICES DEPARTMENT**

PLANNING DIVISION

777 Cypress Avenue, Redding, CA 96001-271

P.O. Box 496071, Redding, CA 96049-6071

530.225.4020 FAX 530.225.4495

January 27, 2011

A-050-250

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JAN 28 2011

COUNTY OF SHASTA  
PERMIT COUNTER

Ms. Lisa Lozier, AICP, Senior Planner  
County of Shasta  
Department of Resource Management  
1855 Placer Street, Suite 103  
Redding, CA 96001

**Subject:** Response to the Recirculated Traffic Analysis - Draft Environmental Impact Report (PRDEIR) for the Knighton Road and Churn Creek Commons Retail Center, GPA 08-002 and RZ-08-003

Dear Ms. Lozier:

Thank you for the opportunity to comment on the revisions to the Draft Environmental Impact Report (DEIR) for the Knighton Road and Churn Creek Commons Retail Center (project). The City of Redding believes that it is working in a partnership with Shasta County to develop the region in an efficient and well-planned manner. As a main access route to the Redding Municipal Airport and the Stillwater Industrial Park from Interstate 5, we believe all residents of Shasta County have an economic interest in maintaining adequate traffic operations on area facilities, including Knighton Road. We appreciate the effort that has been put forward in preparing the revisions to the DEIR, and we believe that our comments will assist the County in accurately identifying the potential impacts of the project.

A

**COMPLETENESS AND ADEQUACY OF THE REVISIONS TO THE DEIR**

Our comments are directed specifically to the contents and adequacy of the revisions to the traffic analysis of the Public Review Draft Environmental Impact Report (PRDEIR). It is important for all concerned that the significant environmental effects of the project are disclosed in the environmental document and that effective mitigation be provided, so that the validity of a possible decision to modify the County General Plan can be fairly considered by the decision makers and the public. We would note that the analysis of any impacts related to air quality and vehicle emissions resulting from the revisions to the traffic section of the DEIR have not been incorporated into the revisions that have been provided.

B

Our review of the revisions to the project's DEIR has identified areas in the analysis which we believe must be addressed prior to certification of the project's EIR as complying with CEQA. Following is a list of the major areas of concern. The attachment to this letter provides additional detail relative to each of the items described below. We believe the traffic analysis and proposed mitigation measures should be revised prior to its consideration for certification, to respond to the comments received from the City of Redding, as well as those that may be received from the other interested parties who may comment on the PRDEIR.

C

**COMMENTS**

1. The revised PRDEIR utilizes analysis methodologies which reduce peak-hour traffic projections by approximately 46 percent, or 15,000 daily vehicle trips (30 percent during peak hour), below base Institute of Traffic Engineering (ITE) standards and those provided in the original document. In turn, these reductions have resulted in modifications to the significance of impacts and/or associated mitigation measures. Our analysis indicates these modifications have been applied in a manner inconsistent with recommended ITE analysis methods and will result in a substantial underestimation of potential project traffic impacts.
2. The PRDEIR identifies that the project will create significant impacts on multiple intersections within the City of Redding, as well as on other regional transportation facilities that serve the City of Redding. In almost all instances, the PRDEIR identifies that the project will not participate in "fair share" mitigation of project impacts because "a guaranteed funding source for the improvements has not been identified or secured." However, in almost all cases, the City of Redding (or partner agencies) has funding or capital improvement programs in place which can serve as the necessary mitigation tool. The County has the ability to require the project to construct improvements generated by the project impacts or to participate with other jurisdictions in mitigation efforts. Consistent with the intent and requirements of CEQA, the City believes the mitigation measures should be revised to reflect an obligation for such construction and/or participation in established programs, including participation in the City's traffic impact fee program. If program modifications are needed to address this substantial change in the County General Plan, mitigation measures can reflect this. It is unreasonable to expect that capital programs can be modified in advance to prepare for such speculative projects, which result from a major land use change.
3. The PRDEIR provides no analysis of the secondary environmental impacts on adjacent city-street intersections resulting from the implementation of the improvements identified in the DEIR as needed to address the project's impacts to the Interstate 5/Cypress Avenue and the Interstate 5/Bonnyview Road intersections. Because the intersections of Cypress Avenue/Hilltop Drive, Cypress Avenue/Bechelli Lane, Bonnyview Road/Churn Creek Road, and Bonnyview Road/Bechelli Lane must operate in a closely coordinated fashion with the freeway ramps, this lack of analysis calls into question the feasibility of the identified mitigation measures. The PRDEIR should be revised to incorporate this analysis as required by CEQA.
4. The PRDEIR analysis utilizes the ITE Handbook 2<sup>nd</sup> Edition (2004) as the foundation for the traffic analysis. The ITE manual has been updated multiple times since 2004 and is currently in its 8<sup>th</sup> edition. A comparison of the assumptions in the PRDEIR between the 2<sup>nd</sup> and 7<sup>th</sup> editions indicates that 3.7 percent more weekday trips and 4.2 percent fewer Saturday trips will be generated than represented in the analysis. The analysis should be revised to utilize the best reasonably available information.
5. The PRDEIR assumes a level of service (LOS) standard of "F" as the threshold for determining the significance of the project's impacts to existing facilities. This LOS represents a grid-locked traffic condition, which currently does not exist at any location within the City or County area. This use as a threshold will serve to under-represent the effect of the project on existing traffic

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facilities. The analysis should be revised to utilize an LOS standard that reflects broadly accepted standards of significance. As an example, in the City of Redding, LOS "C" is used for local streets and intersections, and LOS "D" is utilized for freeway interchanges.

H cont.

6. The analysis relative to traffic queuing on Knighton Road is likely to be inaccurate because of the errors in the PRDEIR trip-generation analysis discussed above and, in turn, the operational effectiveness of the proposed traffic mitigations cannot be accurately measured. There also appears to be no discussion in the PRDEIR disclosing the impacts on intersections on Knighton Road relative to vehicle stacking. The technical appendices to the PRDEIR indicate that vehicle queuing will greatly exceed storage capacity along Knighton Road, resulting in the blockage of intersections and freeway ramps during peak periods and the failure of the proposed mitigations. The PRDEIR should be revised to address this fact.

I

7. The PRDEIR does not disclose the mitigation approach required by CEQA for a phased project, although the project description indicates phasing is intended.

J

**Conclusion**

In the absence of the modifications identified in the comments above, we believe the revisions to the DEIR traffic analysis will not support the conclusions presented in the document. Revision and recirculation of the PRDEIR should be considered to accurately disclose the potential environmental impacts of the project. It is critical that the DEIR identify and implement all feasible mitigation measures to ensure that the requirements of CEQA are satisfied.

K

Because of the impacts of the project on all County residents, we support the County in making every reasonable effort to reach a consensus on the proposed changes to the Shasta County General Plan.

Thank you again for providing this opportunity to comment on the recirculated DEIR. We look forward to working with Shasta County in developing solutions to the concerns and comments raised in our response. If you have any questions concerning this matter, please feel free to call me at 225-4020.

Regards,



Jim Hamilton, AICP,  
Director of Development Services

JH:el

Enclosure

LTR11\A1-27L-LL-KnightonCenter PRDEIR.wpd

- c: Redding City Council
- Redding Planning Commission
- Kurt Starman, City Manager
- Brian Crane, Director of Public Works

**ATTACHMENT**  
**City of Redding Comments Re: PRDEIR**  
**Churn Creek Commons Retail Center**

**Adequacy of Revised Traffic Analysis, Identification of Environmental Effects,  
and Adequacy of Proposed Mitigation Measures**

The Public Review Draft Environmental Impact Report (PRDEIR) acknowledges that the project will result in substantial increases in traffic at the Knighton Road interchange and on surrounding surface streets, as well as in the City of Redding and regional transportation facilities. The City of Redding has reviewed the revisions to the PRDEIR contents, and to the degree that the concerns raised in our original comment letter of December 2009 have not been addressed, we believe they remain valid.

Following are City comments regarding the revisions to the DEIR analysis:

1. ***Appropriate Use of Diverted Link Trips in the Analysis.*** A "diverted link" analysis was completed for the revised PRDEIR traffic analysis and indicates that roughly 7,200 additional weekday daily trips and 9,500 additional Saturday daily trips will divert from Interstate 5 (I-5) to Knighton Road to access the project. Overall, the diverted link trips analysis used in the revised study reduces the projected vehicle trips by 22 percent. The City believes the diverted link trip-reduction analysis presented in the PRDEIR does not accurately reflect the methodology as set forth in the Institute of Traffic Engineering (ITE) manual. While diverted link trips should be taken into consideration for impacts to mainline I-5, the same trips must be counted at the project driveway and on surface streets that access the driveways. In addition, the project trips still occur at the other affected intersections, including the interchange ramp intersections. Clarification is needed as to why the diverted link trips were excluded in the analysis for the I-5 on- and off-ramps and at the Knighton Road and Churn Creek Road project driveways.
  
2. ***Appropriate Use of Internal Trip Reductions.*** The internal trip reductions assumed in the analysis are very high, resulting in a reduced level of impact on existing traffic facilities, and reduced mitigation obligations. The internal trip capture rate used in this traffic study reduces the project trips by approximately 24 percent. We believe the approach used will result in a "double deduction," since internal trips are already deducted in the Shopping Center land use classifications of the ITE Manual (ITE 820). The project traffic study assumes that the total 740,000 square feet of project size is considered a Shopping Center (ITE 820) when Table 3.12-8 identifies only 425,496 square feet as Shopping Center. The remaining 315,164 square feet (total 740,660 square feet) is defined by five different land use designations.

A reduction for internal-trip capture is typical for large commercial projects, but only when there is a development pattern meeting the recommendations of the ITE manual. In combination with the diverted link reductions, the traffic analysis reduces the project trips by as much as 46 percent using internal capture and diverted link trips assumptions. Without the appropriate justification, a more modest deduction should be utilized. It is also noted in the PRDEIR that the Trip Generation Handbook 2<sup>nd</sup> Edition, ITE was used for determining a diverted link trip factor and land use trip generation assumptions. The City of Redding has available the 7<sup>th</sup> edition of the Trip Generation Handbook, and the 8<sup>th</sup> edition is currently

L

M

<p>available as well. A simple comparison of the assumptions between the 2<sup>nd</sup> and 7<sup>th</sup> editions indicates the importance of this, since the 7<sup>th</sup> edition identifies 3.7 percent more weekday trips and 4.2 percent fewer Saturday trips resulting from the project. The analysis should be revised to properly adjust internal trip reductions and diverted links in accordance with current ITE standard methodology.</p>	<p>M cont.</p>
<p>3. <b>Level of Service Standards.</b> A Level of Service (LOS) "F" significance threshold is reflected in many instances in the DEIR. In addition, the assumptions related to trip reductions allocated through erroneous use of internal and diverted link analysis result in an overly generous reduction of the impact on levels of service at City circulation facilities. While this threshold standard is within the authority of the County to establish for County facilities, this LOS threshold represents a "gridlocked" condition and is seldom used as an acceptable threshold for traffic operations or as the baseline to establish mitigation requirements in environmental analysis.</p>	<p>N</p>
<p>4. <b>Adequacy of Traffic-Queuing Analysis.</b> Traffic-queuing information needs to be provided in the text discussion in the DEIR for Existing+Project (mitigated) and Cumulative+Project (mitigated) analysis once the trip-generation analysis has been revised in response to the comments above. This will allow the effectiveness of the proposed mitigations to be reasonably evaluated. The SimTraffic LOS reports indicate a low percentage of volumes served compared to the project demand, and the attachments to the revised DEIR also indicate that the queues for several movements will exceed the available link distances on Knighton Road between the freeway ramps and the Churn Creek Road intersection. In combination, these items call into question the ability of the coordinated signal system to function in the manner anticipated in the analysis and represented in the proposed mitigation in the PRDEIR.</p>	<p>O</p>
<p>5. <b>Adequacy of Analysis re: Secondary Impacts to City Transportation Facilities Resulting from the Project.</b> CEQA requires that direct and indirect significant effects of the project on the environment be identified and described accurately, giving due consideration to both the short-term and long-term effects of the project. The PRDEIR identifies significant impacts to freeway interchanges at Cypress Avenue/I-5; South Bonnyview Road/I-5; and the Rancho Road and Churn Creek intersections. Any improvements to the I-5 ramps at South Bonnyview Road and Cypress Avenue will need to be accompanied by improvements to the local roadways, with associated impacts. However, the revised TIA fails to reflect the secondary environmental effects to adjacent transportation facilities in the City of Redding if the identified mitigations are implemented. In addition, modification of the traffic analysis to reflect accurate assumptions for trip generation as discussed above will likely show a level of service as poor if not worse than depicted in the revised Draft TIA. Also, the mitigation proposed for the Victor Avenue/Rancho Road/Churn Creek Road intersection does not acknowledge the approved design to place a roundabout at this location to improve traffic throughput and to accommodate the unorthodox roadway configuration found at this location. This design solution was arrived at because of the problem of identifying a feasible signalization solution under the cumulative traffic conditions projected for the intersection.</p>	<p>P</p>

6. ***Adequacy of Analysis in Reflecting Potential for Project Phasing.*** The traffic analysis is inconsistent with the project description on page 2-1 of the DEIR that states that the project, "(is) to be phased in accordance with market conditions and required improvement thresholds." The idea of phasing is also reflected in the Urban Decay analysis of the original DEIR and other areas in the original document. CEQA requires that EIRs be written in a manner that is useful to the public and decision makers. To meet this test, court decisions have clarified that project descriptions and related impact assessments must account for reasonably foreseeable phases of development.

Q

The DEIR Traffic Section does not present thresholds for the number of trips, types of commercial uses, or commercial square footage trips that could be accommodated with a phased development approach. It also does not consider thresholds of commercial trip generation that will result in exceeding the capacity of the existing facilities, and does not identify improvements that can be considered on an interim basis assuming the phasing occurs. If the intent of the project applicants is to phase the project development as stated in the PRDEIR, the project description and DEIR should be revised accordingly.

7. ***Adequacy of Proposed Mitigation Measures.*** The PRDEIR concludes that significant impacts will occur to traffic facilities within the City of Redding. These significant impacts occur under both the "existing plus project" and "cumulative conditions." In all cases, no direct mitigation is proposed to the facilities of adjacent jurisdictions because, as stated in the PRDEIR, the impacts occur on facilities "wholly or partly" outside the direct control of Shasta County. The approach represented in the DEIR would simply shift the burden of the improvement needs generated by this project to future development in the City or to City residents. However, the County can choose to establish direct project mitigation responsibilities to offset the project's impacts. This can be accomplished through modifications to the project, by requiring construction of any improvements that are needed where the project has a substantial share of the contribution to the impact, by requiring the formation or participation in benefit fee districts established to fund the mitigation improvements that the project will require, or by requiring participation in existing impact fee programs, such as the City's traffic impact fee program, to the level required to adequately address the project impacts.

R

CEQA states that an agency "should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects the project would have on the environment" (CEQA §15021, et seq.). Ultimately, given the lack of certainty in the proposed mitigation for traffic impacts that is reflected in the revisions to the DEIR, any approval of the project will require the adoption of a "statement of overriding considerations." Such an action must be supported by substantial evidence that sets forth in detail the reasons why the economic and/or social values of the project, as considered by the decision makers, should override the significant unmitigated environmental effects that will result from the project. This information will need to be reflected in the EIR in support of the project-decision process as it moves forward to its final conclusion.

S

**Letter 97: Jim Hamilton, AICP, Director, City of Redding Development Services Department**

**Response 97A:** The comment is noted and incorporated in the EIR.

The County of Shasta is appreciative of the interest of the City of Redding to work in partnership with the County and also recognizes the certified EIR for the Stillwater Business Park.

**Response 97B:** The comment is noted and incorporated in the EIR.

The traffic volumes utilized in the PRDEIR, and as adjusted in response to comments thereon, are less than those in the DEIR. The vehicle emissions and air quality impacts of the project will thus be less than those evaluated in the DEIR, and need not be recalculated.

**Response 97C:** The comment is noted and incorporated in the EIR.

The listed areas of concern will be individually addressed. Where the areas of concern duplicate those of Caltrans and other commentors, and responses thereto have already been provided, they will not be repeated but referenced.

**Response 97D:** The comment is noted and incorporated in the EIR. Please see Comment Letter 85 (Caltrans), Responses 85.1H and 85.1I.

**Response 97E:** The comment is noted and incorporated in the EIR.

Please see Comment Letter 85 (Caltrans), Responses 85.1H and 85.1I. The County may not utilize the comment-listed plans and funding programs to satisfy CEQA case law criteria for adequacy of an EIR. The County may not “mandate” implementation of proposed mitigation measures within the boundaries of other agencies not under the County’s control.

**Response 97F:** The comment is noted and incorporated in the EIR.

CEQA requires only analysis of potential traffic impacts on directly affected facilities, not any speculative and indeterminate effects on widespread elements of an agency’s street or road system.

**Response 97G:** The comment is noted and incorporated in the EIR.

The principles outlined in the 2004 Trip Generation Handbook for the calculation of internal trip reduction remain unchanged. “Trip Generation, An ITE Informational Report” is in its 8<sup>th</sup> edition. “Trip Generation Handbook” is in its 2<sup>nd</sup> edition, 2004. The comment-noted percentage changes (3.7% and 4.2%) between 2<sup>nd</sup> and 7<sup>th</sup> Edition project land use traffic generation are not significant in evaluation of Level of Service (LOS) or other traffic impacts.

**Response 97H:** The comment is noted and incorporated in the EIR.

Please refer to Policy C-61 of the Shasta County General Plan (reproduced on page 3.12-11 of Appendix A of the PRDEIR) which provides for the project-appropriate usage of Level of Service (LOS) E.

**Response 97I:** The comment is noted and incorporated in the EIR.

Based on the analysis in the PRDEIR, and the detailed analysis in Attachment D thereto, the traffic consultant evaluation of potential Knighton Road impacts is that the mitigation measures for impacts identified in the PRDEIR are sufficient to substantially reduce such impacts.

**Response 97J:** The comment is noted and incorporated in the EIR.

Please refer to Letter 85 (Caltrans), Response 85.1X.

**Response 97K:** The comment is noted and incorporated in the EIR.

Again, the County of Shasta is appreciative of the interest of the City of Redding in this project and looks forward to continuing to work with the City in addressing its project impacts.

**Response 97L:** The comment is noted and incorporated in the EIR.

Please see Comment Letter 85 (Caltrans), Response 85.1I.

**Response 97M:** The comment is noted and incorporated in the EIR.

Please see Comment Letter 85 (Caltrans), Responses 85.1H and 85.1I and to Response 97G.

**Response 97N:** The comment is noted and incorporated in the EIR.

Please see Comment Letter 85 (Caltrans), Responses 85.1H and 85.1I and to Response 97H.

**Response 97O:** The comment is noted and incorporated in the EIR.

As reflected in the PRDEIR and the attachments thereto, the mitigation measures proposed will allow for mitigation of project impacts, including queuing. Please refer also to Letter 85 (Caltrans), Response 85.1I. Higher traffic volumes than those utilized in the PRDEIR will not significantly alter the evaluation of the project-related traffic impacts or proposed mitigation measures.

**Response 97P:** The comment is noted and incorporated in the EIR.

Please refer to the Letter 90, Response 90B and Response 97F.

**Response 97Q:** The comment is noted and incorporated in the EIR.

Please refer to Letter 85 (Caltrans), Response 85.1X.

**Response 97R:** The comment is noted and incorporated in the EIR.

Please see Comment Letter 85 (Caltrans), Response 85.1G and Response 97E.

**Response 97S:** The comment is noted and incorporated in the EIR.

The PRDEIR proposes feasible mitigation measures to substantially reduce or eliminate project impacts. Those impacts which are to facilities not under the jurisdiction of the County, and lack CEQA-defined project plans and project-specific guaranteed funding have been considered to be significant and unavoidable, as reflected in the PRDEIR.

January 27, 2011

RECEIVED  
SHASTA COUNTY

JAN 31 2011

Lisa Lozier, AICP, Senior Planner, Shasta County  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001  
Phone: (530) 225-5532

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

Re: Comments on Partially Re-circulated Draft Environmental Impact Report for Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

This letter comments on the Partially Re-circulated Draft Environmental Impact Report dated December 2010 (RDEIR), for the Knighton & Churn Creek Commons Retail Center (Project).

The RDEIR acknowledges that the Project will result in substantial increases in traffic at the Knighton Road/I-5 interchange, as well as on existing surface streets and regional circulation facilities. The following paragraphs further identify problems and inconsistencies in the RDEIR:

A

**General Plan**

The proposed project is inconsistent with the General Plan policy on "access control." The segment of Knighton Road between the Northbound 1-5 Off-ramp and Churn Creek Road is 710 feet and Knighton Road will serve as an arterial roadway by nature of the interchange at 1-5. Proper access control would prohibit full access driveways on this segment of Knight Road. Further, by deferring the improvements identified as mitigation measures is inconsistent with General Plan policy 6-CI, as described on Page 3.12-11 of the RDEIR.

B

**Traffic Data**

The RDEIR indicates "existing" traffic data taken from several sources - including some as old as 6 years. Traffic volumes as old as 2004 are not likely to accurately reflect current traffic conditions and should be updated. It also states the typical Saturday midday traffic peaks occur between 11:00 AM and 1:00 PM. This may not be the case on Saturdays, when traffic typically peaks between 2:00 PM and 4:00 PM. The RDEIR assumes an internal trip reduction of approximately 23 percent for PM Peak hour and 29 percent on Midday Saturday. These values are very high for internal trip reduction. Standard methods developed by the Institute of Transportation Engineers (ITE) uses a reduction rate of 20 percent for the PM Peak hour.

C

**Level Of Service (LOS)**

The traffic studies for the mall show that Knighton Road between Churn Creek Road and Interstate 5 - the main route to potential new stores - as well as the freeway onramps would hit "Level of Service F." And an "F" means the same thing in the traffic studies as it does in an economics class. The roads, in brief, would fail.

D

**Truck Stop**

The proposed project indicates a reconfiguration of the access points along Knighton Road to accommodate site circulation for the proposed project and the TA truck stop to improve safety along Knighton Road. As such, the proposed improvements at the truck stop must be included in the project description of the DEIR and all impact analyses included in the DEIR and RDEIR must evaluate the truck stop improvements.

E

Identifying improvements to the truck stop requires improvements to be constructed on private property that may not be controlled by the owner of the proposed project. As such, there is no way to know if permission will be granted by the owner of the truck stop to allow the identified improvements.

F

**School Impact**

The RDEIR does not adequately analyze the Project's potential impacts to schools. It does not assess impacts to schools resulting from increased traffic due to the Project, and fails to provide for appropriate mitigation measures.

Potential impacts to schools include, but are not limited to, increased risk of injury to students from traffic accidents, ingress/egress problems at student pick-up and drop-off times, disruption of established school bus routes, and increased noise interfering with classroom and recreational activities. These potential impacts should be identified and assessed.

G

**Financial Responsibility**

The RDEIR does not indicate when improvements funded by the fee programs will be implemented. Given the current economic climate for new development, and depending on the current financial status of those fee programs, mitigation measures for the proposed project may not be implemented for years after occupancy is allowed at the proposed project. This will result in the project causing severely congested conditions and safety hazards at numerous locations in the project study area.

H

The RDEIR indicates the proposed project will create significant impacts at the Northbound and Southbound I-5 off-ramp intersections at Knighton Road. Deferring signalization of these intersections will result in significant congestion at those locations. This congestion could, in turn, result in vehicle queuing on the I-5 off-ramp that extends to the freeway mainline. Vehicle queuing that extends to the freeway mainline creates a severe traffic hazard.

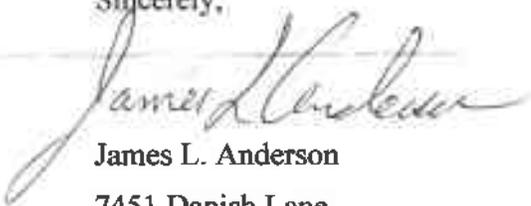
I

**Conclusion**

This project will increase traffic counts, reduce the Level of Service at some locations to unacceptable. Full funding for the required improvements is not currently available – thus going forward with this project without securing the funds necessary to mitigate these issues exacerbates the LOS and safety conditions. A decision to approve such a project runs against common sense, precedent and the county's General Plan.

J

Sincerely,



James L. Anderson

7451 Danish Lane

Redding, CA 96002

**Letter 98: James L. Anderson**

**Response 98A:** The comment is noted and incorporated in the EIR.

**Response 98B:** The comment is noted and incorporated in the EIR.

The project complies with the General Plan Policy C-6d as follows: “New commercial and industrial development accessing arterials and collectors shall provide access controls for public safety by means such as limiting the location and number of driveway access points and controlling ingress and egress turning movements”. In addition to consideration of this constraint on access to and egress from the project itself, Appendix D to the PRDEIR provides a study of correctional measures for existing truck stop access on the south side of Knighton Road.

**Response 98C:** The comment is noted and incorporated in the EIR.

With respect to “existing” traffic data, please see the response to Letter 95, Response 95B.

Please see Comment Letter 104, Response 104F. Please see Comment Letter 85 (Caltrans), Response 85.1H regarding internal trip generation rates.

**Response 98D:** The comment is noted and incorporated in the EIR.

The cited level of service was calculated as the unmitigated level, not the level of service projected after implementation of physical mitigation measures, Level of Service B.

**Response 98E:** The comment is noted and incorporated in the EIR.

Please refer to Letter 85 (Caltrans), Response 85.1P and Letter 92.

**Response 98F:** The comment is noted and incorporated in the EIR.

Please refer to Letter 85 (Caltrans), Response 85.1P and Letter 92.

**Response 98G:** The comment is noted and incorporated in the EIR.

The speculated impacts to the school and its services are not quantifiable nor are there accepted thresholds to environmentally evaluate their significance.

**Response 98H:** The PRDEIR does not propose deferral of mitigation; it will timely implement the mitigation measures for which it is empowered. It simply notes that it does not have the authority to compel the implementation of proposed mitigation measures by other agencies or jurisdictions.

**Response 98I:** Please see Response 98H.

**Response 98J:** Please see Response 98H.

RECEIVED  
SHASTA COUNTY

January 27, 2011

JAN 31 2011

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

Lisa Lozier, AICP, Senior Planner, Shasta County  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001  
Phone: (530) 225-5532

Re: Comments on Partially Re-circulated Draft Environmental Impact Report for  
Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

This letter comments on the Partially Re-circulated Draft Environmental Impact Report dated December 2010 (RDEIR), for the Knighton & Churn Creek Commons Retail Center (Project).

The RDEIR acknowledges that the Project will result in substantial increases in traffic at the Knighton Road/I-5 interchange, as well as on existing surface streets and regional circulation facilities. The following paragraphs further identify problems and inconsistencies in the RDEIR:

A

**General Plan**

The proposed project is inconsistent with the General Plan policy on "access control." The segment of Knighton Road between the Northbound 1-5 Off-ramp and Churn Creek Road is 710 feet and Knighton Road will serve as an arterial roadway by nature of the interchange at 1-5. Proper access control would prohibit full access driveways on this segment of Knight Road. Further, by deferring the improvements identified as mitigation measures is inconsistent with General Plan policy 6-CI, as described on Page 3.12-11 of the RDEIR.

B

**Traffic Data**

The RDEIR indicates "existing" traffic data taken from several sources - including some as old as 6 years. Traffic volumes as old as 2004 are not likely to accurately reflect current traffic conditions and should be updated. It also states the typical Saturday midday traffic peaks occur between 11:00 AM and 1:00 PM. This may not be the case on Saturdays, when traffic typically peaks between 2:00 PM and 4:00 PM. The RDEIR assumes an internal trip reduction of approximately 23 percent for PM Peak hour and 29 percent on Midday Saturday. These values are very high for internal trip reduction. Standard methods developed by the Institute of Transportation Engineers (ITE) uses a reduction rate of 20 percent for the PM Peak hour.

C

**Level Of Service (LOS)**

The traffic studies for the mall show that Knighton Road between Churn Creek Road and Interstate 5 - the main route to potential new stores - as well as the freeway onramps would hit "Level of Service F." And an "F" means the same thing in the traffic studies as it does in an economics class. The roads, in brief, would fail.

D

**Truck Stop**

The proposed project indicates a reconfiguration of the access points along Knighton Road to accommodate site circulation for the proposed project and the TA truck stop to improve safety along Knighton Road. As such, the proposed improvements at the truck stop must be included in the project description of the DEIR and all impact analyses included in the DEIR and RDEIR must evaluate the truck stop improvements.

E

Identifying improvements to the truck stop requires improvements to be constructed on private property that may not be controlled by the owner of the proposed project. As such, there is no way to know if permission will be granted by the owner of the truck stop to allow the identified improvements.

**School Impact**

The RDEIR does not adequately analyze the Project's potential impacts to schools. It does not assess impacts to schools resulting from increased traffic due to the Project, and fails to provide for appropriate mitigation measures.

F

Potential impacts to schools include, but are not limited to, increased risk of injury to students from traffic accidents, ingress/egress problems at student pick-up and drop-off times, disruption of established school bus routes, and increased noise interfering with classroom and recreational activities. These potential impacts should be identified and assessed.

**Financial Responsibility**

The RDEIR does not indicate when improvements funded by the fee programs will be implemented. Given the current economic climate for new development, and depending on the current financial status of those fee programs, mitigation measures for the proposed project may not be implemented for years after occupancy is allowed at the proposed project. This will result in the project causing severely congested conditions and safety hazards at numerous locations in the project study area.

G

The RDEIR indicates the proposed project will create significant impacts at the Northbound and Southbound 1-5 off-ramp intersections at Knighton Road. Deferring signalization of these intersections will result in significant congestion at those locations. This congestion could, in turn, result in vehicle queuing on the I-5 off-ramp that extends to the freeway mainline. Vehicle queuing that extends to the freeway mainline creates a severe traffic hazard.

**Conclusion**

This project will increase traffic counts, reduce the Level of Service at some locations to unacceptable. Full funding for the required improvements is not currently available – thus going forward with this project without securing the funds necessary to mitigate these issues exacerbates the LOS and safety conditions. A decision to approve such a project runs against common sense, precedent and the county's General Plan.

H

Sincerely,

Rebecca Sanderson  
7451 Danish Lane  
Redding, CA 96002  
223-1522

**Letter 99: Rebecca S. Anderson**

**Response 99A:** The comments are noted and incorporated in the EIR.

They duplicate those in Letter 98; please see the responses to Comment Letter 98.

**Response 99B:** See Response 99A.

**Response 99C:** See Response 99A.

**Response 99D:** See Response 99A.

**Response 99E:** See Response 99A.

**Response 99F:** See Response 99A.

**Response 99G:** See Response 99A.

RECEIVED  
SHASTA COUNTY

January 27, 2011

JAN 31 2011

Lisa Lozier, AICP, Senior Planner, Shasta County  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001  
Phone: (530) 225-5532

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

Re: Comments on Partially Re-circulated Draft Environmental Impact Report for  
Knighton & Churn Creek Commons Retail Center

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A

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The traffic studies for the mall show that Knighton Road between Churn Creek Road and Interstate 5 - the main route to potential new stores - as well as the freeway onramps would hit "Level of Service F." And an "F" means the same thing in the traffic studies as it does in an economics class. The roads, in brief, would fail.

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Identifying improvements to the truck stop requires improvements to be constructed on private property that may not be controlled by the owner of the proposed project. As such, there is no way to know if permission will be granted by the owner of the truck stop to allow the identified improvements.

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Potential impacts to schools include, but are not limited to, increased risk of injury to students from traffic accidents, ingress/egress problems at student pick-up and drop-off times, disruption of established school bus routes, and increased noise interfering with classroom and recreational activities. These potential impacts should be identified and assessed.

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G

Sincerely,



STEVEN G. MADSEN  
19550 Mockingbird Lane  
Reno, CA 96002

**Letter 100 Steven G. Madsen**

**Response 100A:** The comments are noted and incorporated in the EIR.

They duplicate those in Letter 98; please see the responses to Comment Letter 98.

**Response 100B:** See Response 100A.

**Response 100C:** See Response 100A.

**Response 100D:** See Response 100A.

**Response 100E:** See Response 100A.

**Response 100F:** See Response 100A.

**Response 100G:** See Response 100A.

January 27, 2011

RECEIVED  
SHASTA COUNTY

Lisa Lozier, AICP, Senior Planner, Shasta County  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001  
Phone: (530) 225-5532

JAN 31 2011

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

Re: Comments on Partially Re-circulated Draft Environmental Impact Report for Knighton & Churn Creek Commons Retail Center

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A

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E

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G

Sincerely,

A handwritten signature in cursive script, appearing to read "Georgia P. Lozier". The signature is written in dark ink and is positioned below the word "Sincerely,".

**Letter 101 Georgia L. Leb**

**Response 101A:** The comments are noted and incorporated in the EIR.

They duplicate those in Letter 98; please see the responses to Comment Letter 98.

**Response 101B:** See Response 101A.

**Response 101C:** See Response 101A.

**Response 101D:** See Response 101A.

**Response 101E:** See Response 101A.

**Response 101F:** See Response 101A.

**Response 101G:** See Response 101A.

LETTER 102

January 27, 2011

Lisa Lozier, AICP, Senior Planner, Shasta County  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001  
Phone: (530) 225-5532

RECEIVED  
SHASTA COUNTY

JAN 31 2011

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

Re: Comments on Partially Re-circulated Draft Environmental Impact Report for  
Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

This letter comments on the Partially Re-circulated Draft Environmental Impact Report dated December 2010 (RDEIR), for the Knighton & Churn Creek Commons Retail Center (Project).

The RDEIR acknowledges that the Project will result in substantial increases in traffic at the Knighton Road/I-5 interchange, as well as on existing surface streets and regional circulation facilities.

A

The proposed project is inconsistent with the General Plan policy on "access control."

Traffic studies show that the distance from the proposed Mall to I 5 would become very crowded and the road would not sustain the amount of traffic without much repair or reworking, thus become a debt liability to the county

B

The impact on the grammar School at the intersection of Churn Creek and Knighton Road, its students, the need of parents to access their students and the school busses schedules has not been identified and assessed.

C

We do not need to have as much congestion of traffic as will occur in a rural setting. A decision to approve such a project runs against common sense, precedent and the county's General Plan.

D

Sincerely,

*Charles Capp*

*Sara Capp*  
Charles and Sara Capp

20019 Falcon Dr  
Redding 96002

**Letter 102 Charles & Sara Capp**

**Response 102A:** The comment is noted and incorporated in the EIR.

**Response 102B:** The comment is noted and incorporated in the EIR.

The current General Plan-designated Knighton Road street classification, assuming that this is the road segment to which the comment refers, is a minor collector. There are not access constraints on this street category. The project proposes development of Knighton Road to arterial width.

The PRDEIR has evaluated this issue and determined that the proposed mitigation measures (widening the road to six lanes and modifying south-side access) will substantially reduce this impact.

**Response 102C:** The comment is noted and incorporated in the EIR.

Please refer to the DEIR and to the responses to comments thereon in Section 3.1 of this Final EIR.

**Response 102D:** The comment is noted and incorporated in the EIR.

# Pacheco Union School District

LETTER 103



Superintendent: Steven Mitrovich



Prairie Elementary School  
20981 Dersch Rd  
Anderson, CA 96007  
(530) 365-1801  
Principal: Deidra Hoffman

Trustees  
Chris Carmona  
Jennifer Cross  
Patrick Richards  
Larry Solberg  
Melissa Swanson

Pacheco School  
7430 Pacheco School Rd.  
Redding, CA 96002  
(530) 224-4585  
Principal: Jason Provence

January 28, 2011

Hand Delivered

Lisa Lozier, AICP, Senior Planner  
County of Shasta  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001  
Phone: (530) 225-5532

RECEIVED

JAN 31 2011

COUNTY OF SHASTA  
PERMIT COUNTER

11:53 am



Re: Comments of Pacheco Union School District on Partially Recirculated Draft Environmental Impact Report for Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

This letter provides comments on behalf of Pacheco Union School District ("School District" or "District") on the Partially Recirculated Draft Environmental Impact Report dated December 2010 ("PRDEIR"), prepared for the Knighton & Churn Creek Commons Retail Center, file numbers GPA08-002 and ZA08-003 ("Project").

The Project proposes the future development of a commercial retail, dining, entertainment and lodging center on approximately 92 acres in Shasta County, located at the northeast corner of Knighton Road and the Interstate Highway 5 interchange. When completed the Project would include approximately 740,000 square feet of mixed commercial development. In response to the Notice of Preparation for the Project, the County received comments on a number of issues relating to impacts on transportation and circulation, including comments regarding impacts on the nearby Pacheco School arising from increased traffic resulting from the Project. The PRDEIR focuses solely on transportation and circulation. The PRDEIR, like the DEIR before it, fails to adequately consider traffic impacts on schools.

### Complete Failure to Address Impacts on Schools

Although the PRDEIR now provides what appears to be an in-depth analysis of certain traffic impacts of the Project, including a revised traffic analysis now incorporating a link diverted trip factor, freeway ramp merge/diverge analysis, and truck stop analysis, it includes no analysis on the impact on public schools and fails entirely to identify the impact on schools as one of the impacts of the Project. As one gross example of the PRDEIR's total ignorance of the Project's traffic impact on schools, the new circulation plan includes a new exit for the Travel Centers of America truck stop *directly across* from Pacheco School's drop off/pick up lot on Pacheco Road. The PRDEIR pays no consideration to any traffic impact resulting from the continuous outflow of large commercial trucks across the street from the Pacheco School drop off/pick up lot -- be it access, safety, noise, or otherwise.

In fact, aside from acknowledging the County's receipt of comments relating to potential traffic impacts to Pacheco School (PRDEIR, pg. 3.12-1), it makes no mention of traffic impacts to schools, at all.

20981 Dersch Road \* Anderson, CA \* CA 96007  
Phone: (530) 365-3335 Fax: (530) 365-3399  
Site: <http://www.pacheco.k12.ca.us>

A

B

Since the PRDEIR wholly ignores the traffic impacts on schools generally, and Pacheco School in particular, the PRDEIR is inadequate. The preparer of an EIR must make a genuine effort to obtain and disseminate information necessary to the understanding of impacts of project implementation. (See CEQA Guidelines § 15151; Sierra Club v. State Board of Forestry (1994) 7 Cal.4th 1215, 1236.) Additionally, an EIR must set forth a reasonable, detailed and accurate description of existing environmental settings, including both natural and man-made conditions, such as public facilities. (See CEQA Guideline §§ 15125 (c) & 15360.)

B cont.

The DEIR does not meet its informational purpose. The PRDEIR does not provide an analysis of traffic impacts resulting from the physical development. For instance, the PRDEIR should have, at a minimum:

- Described the existing and the anticipated vehicular traffic and student pedestrian movement patterns to and from school sites, including consideration of bus routes.
- Assessed the impact of increased vehicular movement and volumes, including potential conflicts with school pedestrian movement, school transportation, and busing activities.
- Estimated travel demand and trip generation, trip distribution and trip assignment including consideration of school site and home to school travel.
- Assessed the need to add sound-proofing to offset noise increases from the resulting traffic.
- Assessed cumulative impacts on schools resulting from increased vehicular movement and volumes expected from additional development already approved or pending.

C

Traffic issues are a particular concern because the increased traffic volume may require new and additional routes, and may increase safety concerns for student walking or riding bicycles or other modes of transportation to and from Pacheco School.

Without knowing the extent and nature of the Project's traffic impact on schools, readers of the PRDEIR and agencies including the District are unable adequately to assess the actual impact. Similarly, without knowing more about the specific impacts, it is impossible to formulate meaningful mitigation measures.

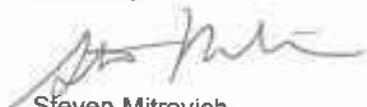
D

Conclusion

It is the District's position that the PRDEIR simply does not adequately analyze the Project's potential impacts to schools. The PRDEIR does not assess impacts to schools resulting from increased traffic due to the Project, and fails to provide for appropriate mitigation measures. Potential impacts to schools include, but are not limited to, increased risk of injury to students from traffic accidents, ingress/egress problems at student pick-up and drop-off areas, disruption of established school bus routes, and increased noise interfering with classroom and recreational activities. These potential impacts should be identified and assessed. The District encourages the County to work cooperatively with the District and consider measures, after conducting the necessary analysis of those impacts, that can adequately address the impacts on the District's schools.

E

Sincerely,



Steven Mitrovich  
Superintendent

**Letter 103: Steven G. Mitrovich, Superintendent, Pacheco Union School District**

**Response 103A:** The comment is noted and incorporated in the EIR.

**Response 103B:** The comment is noted and incorporated in the EIR.

Enrollment impacts to Pacheco School were addressed in the DEIR. Traffic impacts to the school will be less than those previously evaluated. Please see Comment Letter 98, Response 98G.

The proposed relocation of the Travel Centers of America (TA) access points has been anticipated since the conditional use permit for the truck stop was evaluated and approved in 1990, and is incorporated as a condition of approval within that use permit (Shasta County Conditional Use Permit 96-90).

It is believed that the DEIR, the PRDEIR and the Final EIR will fully comply with CEQA.

**Response 103C:** The comment is noted and incorporated in the EIR.

The District's assessment of the CEQA required data and analysis in the project EIR is acknowledged. Please refer to the closing paragraph of the previous Comment response.

**Response 103D:** The comment is noted and incorporated in the EIR.

**Response 103E:** The comment is noted and incorporated in the EIR.

Traffic impacts have been evaluated for adjacent County roads and with applicable mitigation measures impacts to such roads are less than significant. Please see Response 103B.

**Churn Creek Bottom Homeowners and Friends  
P.O. Box 493091  
Redding, CA 96049-3091**

January 28, 2011

Ms. Lisa Lozier, AICP, Senior Planner  
Shasta County Dept of Resource Management  
Planning Division  
1855 Placer St.  
Redding, CA 96001

RECEIVED

JAN 31 2011

COUNTY OF SHASTA  
PERMIT COUNTER

Dear Ms. Lozier:

The attached summary prepared by Mr. Stephen Pyburn, P.E; T.E. will serve as the comment letter submitted by the Churn Creek Bottom Homeowners and Friends Association. The letter addresses the Recirculated Traffic DEIR for the Knighton and Churn Creek Commons Retail Center. We reiterate that the proposed traffic plan even after recirculation is completely unworkable. Any responsible local governing body should not seriously contend that the traffic plan submitted by the Hawkins Development Company would suffice as being "good enough" for our community.

A

If you have any questions or care to discuss this matter, please contact me.

Sincerely,



Rod Evans, Chairman  
Churn Creek Bottom Homeowners and Friends

January 17, 2011

Stephen M. Pyburn, P.E., T.E.

209 Hance Court

Roseville, CA 95747

916-704-2340

Mr. Rod Evans

Churn Creek Bottoms Homeowners and Friends Association

P.O. Box 493091

Redding, CA 96049-3091



**Re: Knighton and Churn Creek Commons Retail Center Recirculated Draft EIR Review Comments**

Dear Mr. Evans:

At your request, I have reviewed the recirculated Transportation and Circulation chapter of the *Knighton and Churn Creek Commons Retail Center Draft Environmental Impact Report (DEIR)*. The recirculated chapter, entitled, "Chapter Two, Changes to the Draft EIR" (RDEIR)<sup>1</sup> was obtained from the Shasta County website.

Based on my review of the RDEIR, I offer the comments listed below. It should be noted that the following comments address the technical aspects and ramifications of the traffic impact analysis documented in the RDEIR. I have not included any commentary of obvious facts stated in the RDEIR.

- |   |   |
|---|---|
| 1. Page 3.12-4 indicates "existing" traffic data taken from several sources – including some as old as 2004 (Shastina Ranch). Traffic volumes as old as 2004 are not likely to accurately reflect current traffic conditions and should be updated.   | B |
| 2. Page 3.12-4 states the typical midday traffic on Saturday occurs between 11:00 AM and 1:00 PM. This may not be the case on Saturdays, when traffic typically peaks between 2:00 PM and 4:00 PM. Analysis of 11:00 AM to 1:00 PM volumes on Saturday is likely to underestimate traffic impacts. It is appropriate and typical for Saturday peak hours for traffic volumes to be identified with a 24-hour volume count prior to collecting Saturday peak hour traffic volumes. Based on the methodology described in the RDEIR, it does not appear the actual peak hour on Saturday was determined through analytical means and the RDEIR may not evaluate actual peak hour conditions.  | C |
| 3. Page 3.12-5 indicates the roadway Level of Service is based on "guidelines [used] to identify the need for new or upgraded facilities." In addition, the footnote for Table 3.12-1 indicates "Actual thresholds for each Level of Service listed above may vary depending on a variety of factors including (but not limited to) roadway curvature and grade, intersection or interchange spacing, driveway spacing, percentage of trucks and other heavy vehicles, lane widths, signal timing, on-street parking, volume of cross traffic and pedestrians, etc." The RDEIR does not indicate that any adjustments were implemented for these factors. As a result, using the "guideline" values indicated in Table 3.12-1 may lead to inaccurate estimation of Level of Service. This is especially true for Knighton Road adjacent to the project site since that roadway provides access to a truck stop and the concentration of trucks on the roadway can affect the Level of Service of the roadway. There are analysis tools available that accurately estimate roadway segment Level of Service. Such tools account for varying roadway and traffic conditions that affect the Level of Service. As such, analysis of actual roadway conditions could yield different results than are indicated in the RDEIR. | D |
| 4. The following comments are based on the trip generation presented in the RDEIR:<br>a. The RDEIR does not document the methodology used to develop the "Internalization" factor that is used to reduce trip generation of the proposed project, as indicated in Table 3.12-8. Per that table, the RDEIR assumes an internal reduction of approximately 23 percent for PM Peak hour and 29 percent for Midday Saturday. These values are very high for internal trip reduction. In fact, applying standard methods developed by the Institute of Transportation Engineers (ITE) for estimating internal trip reduction results in an internal reduction rate of 20 percent for the PM Peak hour. A similar rate would apply to Saturday trips since the ITE method is based on the size and nature of land uses considered. As a result, the traffic study assumes an internal reduction   | E |

<sup>1</sup> Available online: [http://www.co.shasta.ca.us/index/drm\\_index/planning\\_index/eirs/knighton\\_churn\\_creek\\_commons.aspx](http://www.co.shasta.ca.us/index/drm_index/planning_index/eirs/knighton_churn_creek_commons.aspx)

<p>rate that is undocumented, is higher than would be expected based on standard analytical procedures, and results in overly reducing project trips (and therefore potential impacts) of the proposed project.</p>	E cont.
<p>b. The RDEIR does not provide any description of how the “diverted link trips” were derived or how those trips are treated in the analysis. It would be appropriate to provide such documentation so that the results can be properly evaluated. Diverted link trips must not be deducted from the site driveway intersections since those trips must use those driveways to access the site.</p> <p>5. General Plan policy C-6d, as stated on Page 3.12-10, addresses access control. The extent that the proposed project is consistent with this policy is highly subjective. The segment of Knighton Road between the Northbound I-5 Off-ramp and Churn Creek Road is 710 feet and Knighton Road will serve as an arterial roadway by nature of the interchange at I-5. Proper access control would prohibit full access driveways on this segment of Knight Road for several reasons. First, the full access driveway creates a short but high-volume weave area between I-5 and the site driveway. Second, the driveway will create short areas for vehicle queuing between the site driveway and the Northbound I-5 Off-ramp, and between the site driveway and the Churn Creek Road intersection. Third, the close spacing of this intersection with the adjacent intersections will tend to inhibit orderly traffic flow away from the interchange at I-5.</p>	F
<p>6. Vehicle queuing analysis:</p> <p>a. The RDEIR does not include a vehicle stacking analysis for existing plus project or cumulative plus project conditions. The original DEIR indicated that significant vehicle queues at the main project driveway on Knighton Road will block the Knighton Road/Northbound I-5 Off-ramp intersection and the Knighton Road/Churn Creek Road intersection. There is nothing in the RDEIR (reduction in size of the propose project or implementation of roadway capacity improvements) that indicates such vehicle stacking will not result under conditions analyzed for the RDEIR.</p>	G
<p>b. Appendix C of the RDEIR includes a summary of the vehicle queuing analysis for mitigated existing plus project and mitigated cumulative plus project conditions (as noted below). However, neither the methodology used to determine the vehicle queue lengths nor the results of this analysis are mentioned in the RDEIR. As a result, the validity of this data cannot be assessed.</p>	H
<p>c. The analysis sheets provided in Appendix C (Part 5) indicate anticipated vehicle queuing for mitigated existing plus project conditions. That analysis indicates vehicle queues at the Northbound I-5 Off-ramp intersection will exceed available storage lengths. It should be understood that those results are for mitigated conditions. However, the RDEIR indicates in various locations that mitigation measures will be implemented at some future date when either funding becomes available or the improvements are implemented through a fee program. If the improvements are not in place when occupancy is allowed at the proposed project, then the vehicle stacking caused by the proposed project will be much greater than that indicated in Appendix C.</p>	I
<p>d. The analysis sheets provided in Appendix C (Part 6) indicate anticipated vehicle queuing for mitigated cumulative conditions. In fact, the appendix indicates vehicle stacking at the intersections of Knighton Road with Northbound I-5 Off-ramp, Southbound I-5 Off-ramp, and the main project driveway will exceed the available vehicle storage lengths for various traffic movements at those locations. More specifically, for the intersection of Knighton Road and the main project driveway, Appendix C indicates the available vehicle storage length is 470 feet for eastbound traffic movements (the distance from that intersection to the Northbound I-5 Off-ramp). Appendix C further indicates the 95% vehicle queue length with the proposed project will be 1,324 feet for the eastbound right-turn movement and 703 feet for the eastbound through movement. This means the traffic at the signal at the main project driveway will routinely block the Northbound I-5 Off-ramp signal and will extend past I-5, nearly to the Southbound I-5 Off-ramp intersection. In addition, the RDEIR indicates in various locations that mitigation measures</p>	J

<p>will be implemented at some future date when either funding becomes available or the improvements are implemented through a fee program. If the mitigation measures identified for cumulative conditions are not in place prior to the anticipated traffic growth, then the vehicle stacking caused by the proposed project will be much greater than that indicated in Appendix C.</p>	<p>J cont.</p>
<p>7. The analysis sheets in Appendix C for the freeway off-ramp intersections for cumulative plus project conditions report an error for the projected vehicle queue lengths of the I-5 off-ramps at Knighton Road. This is likely the result of the intersection not being properly input in the analysis program and should be corrected so the project analysis can be properly evaluated.</p>	<p>K</p>
<p>8. Page 3.12-15 indicates "Other improvements, such as those identified for the I-5/Cypress Road interchange are within the jurisdiction of other public agencies including the City of Redding, City of Anderson and California Department of Transportation, and are outside the jurisdiction of the lead agency for this project." The following comments are based on this statement:</p> <ul style="list-style-type: none"> <li>a. If the RDEIR includes impacts that are within jurisdictions other than Shasta County or Caltrans, then the standards of significance and other applicable policies for those jurisdictions must be applied in this RDEIR.</li> <li>b. The ramification of this statement is not given although it is implied that the proposed project is not responsible for implementing mitigation measures in those locations. However, the project is not prohibited from implementing mitigation measures in these jurisdictions and lack of implementing mitigation measures in those jurisdictions may result in the proposed project not properly mitigating its impacts, as is required by state law.</li> </ul>	<p>L</p>
<p>9. Page 3.12-15 states "the applicant shall be required to pay a fair share of additional capital costs for Knighton Road improvements." The following comments are based on this statement:</p> <ul style="list-style-type: none"> <li>a. The RDEIR does not indicate when improvements funded by the fee programs will be implemented. Given the current economic climate for new development, and depending on the current financial status of those fee programs, mitigation measures for the proposed project may not be implemented for years after occupancy is allowed at the proposed project. This will result in the project causing severely congested conditions and safety hazards at numerous locations in the project study area.</li> <li>b. Deferring the improvements identified as mitigation measures is inconsistent with General Plan policy 6-C1, as described on Page 3.12-11 of the RDEIR.</li> <li>c. Page 3.12-19 indicates the proposed project will create significant impacts at the Northbound and Southbound I-5 Off-ramp intersections at Knighton Road. Deferring signalization of these intersections will result in significant congestion at those locations. This congestion could, in turn, result in vehicle queuing on the I-5 Off-ramp that extends to the freeway mainline. Vehicle queuing that extends to the freeway mainline creates a severe traffic hazard. As a result, it is recommended that the off-ramp intersections be signalized before occupancy is allowed for any part of the proposed project, even if the signals at the off-ramps would be temporary and replaced when the interchange improvements are implemented.</li> </ul>	<p>M</p>
<p>10. The following comments are based on the analysis of the truck stop improvements:</p> <ul style="list-style-type: none"> <li>a. Page 3.12-45 indicates "As part of the proposed project, a reconfiguration of the access points along Knighton Road is proposed to accommodate the site circulation for the proposed project and the TA and improve safety along Knighton Road." As such, the proposed improvements at the truck stop must be included in the project description of the DEIR and all impact analyses included in the DEIR and RDEIR must evaluate the truck stop improvements.</li> </ul>	<p>N</p>

- b. Identifying improvements to the truck stop requires improvements to be constructed on private property that may not be controlled by the owner of the proposed project. As such, there is no way to know if permission will be granted by the owner of the truck stop to allow the identified improvements.
- c. Page 3.12-49 of the RDEIR includes a mitigation measure to implement the improvements identified for the truck stop. However, a specific impact for that mitigation measure is not identified and since the proposed truck stop improvements are part of the proposed project, it is not appropriate to specify the improvements as a mitigation measure.
- d. The lane configurations, traffic controls, and traffic volumes assumed for the existing plus project conditions assumed in the analysis of the truck stop improvements, shown in Figure 3.12-17, do not match the lane configurations, traffic controls, and traffic volumes assumed for the impact analysis, as shown in Figure 3.12-7. The differing assumptions for these critical parameters results in significantly different Level of Service analysis results depicted in Table 3.12-13 and stated on Page 3.12-47. The study needs to clarify which set of improvements, those shown in Figure 3.12-7 or those shown in Figure 3.12-17, will be implemented with the proposed project and both analyses need to be conducted consistently.
- e. The lane configurations, traffic controls, and traffic volumes assumed for the cumulative plus project conditions assumed in the analysis of the truck stop improvements, shown in Figure 3.12-18, do not match the lane configurations, traffic controls, and traffic volumes assumed for the impact analysis, as shown in Figure 3.12-12. The differing assumptions for these critical parameters results in significantly different Level of Service analysis results depicted in Table 3.12-20 and stated on Page 3.12-47. The study needs to clarify which set of improvements, those shown in Figure 3.12-12 or those shown in Figure 3.12-18, will be implemented with the proposed project and both analyses need to be conducted consistently.
- f. Page 3.12-42 indicates "It is anticipated that the traffic signals on the Knighton Road corridor would be coordinated as part of a signal system to improve operations." However, the traffic impact analysis does not indicate that that analysis is based on a similar assumption. This discrepancy should be clarified, and the analysis of the truck stop and impact analysis must be conducted using the same set of traffic operations parameters.
- g. The queuing analysis presented on Page 3.12-48 assumes significant capacity improvements and traffic signal coordination along Knighton Road. However, the impact analysis on Page 3.12-19 indicates significant improvements at the intersections of the Northbound and Southbound I-5 Off-ramp signals will not be implemented with the proposed project. Both the impact analysis and the truck stop analysis need to be conducted on the same set of assumptions. At a minimum, the queuing analysis for the truck stop improvements should present results assuming the same level of improvements assumed for the impact analysis.

N cont.

I would be happy to answer any questions you may have. Feel free to contact me at the (916) 704-2340 or via email at SMPyburn@comcast.net.

Sincerely,



Stephen M. Pyburn, P.E., T.E.

**Letter 104: Rod Evans, Chairman, Churn Creek Bottom Homeowners and Friends**

**Response 104A:** The comment is noted and incorporated in the EIR.

**Response 104B:** The comment is noted and incorporated in the EIR.

Please see Comment Letter 96, Response 96B.

**Response 104C:** The comment is noted and incorporated in the EIR.

The commentor's opinion is acknowledged. The PRDEIR is accurate.

**Response 104D:** The comment is noted and incorporated in the EIR.

The commentor's opinion is acknowledged. Absent any specificity re suggested alternative approaches, their relative validity cannot be evaluated.

**Response 104E:** The comment is noted and incorporated in the EIR.

Please see the Letter 85 (Caltrans), Responses 85.1G and 85.1H.

**Response 104F:** The comment is noted and incorporated in the EIR.

The project complies with General Plan Policy C-6d as follows: "New commercial and industrial development accessing arterials and collectors shall provide access controls for public safety by means such as limiting the location and number of driveway access points and controlling ingress and egress turning movements". In addition to consideration of this constraint on access to and egress from the project itself, Appendix D to the PRDEIR provides a study of correctional measures for existing truck stop access on the south side of Knighton Road.

The PRDEIR finds the resulting traffic pattern on Knighton Road to operate as mitigated, at a satisfactory level of service (LOS).

**Response 104G:** The comment is noted and incorporated in the EIR.

Contrary to the comment, both the reduced traffic volumes (PRDEIR, as modified by the Letter 85, Response 85.1I), the widening of Knighton Road, and the proposed truck site access/egress mitigate the DEIR conclusion.

**Response 104H:** The comment is noted and incorporated in the EIR.

The data included in the PRDEIR and its Appendices provide an adequate basis for vehicle queuing analysis and complies with CEQA requirements.

**Response 104I:** The comment is noted and incorporated in the EIR.

The PRDEIR does not propose deferral of the proposed mitigation measures essential to prevent excessive vehicle queuing. Please see Comment Letter 98, Response 98I.

**Response 104J:** The comment is noted and incorporated in the EIR.

The PRDEIR does not propose deferral of proposed mitigation measures essential to prevent excessive vehicle queuing.

**Response 104K:** The comment is noted and incorporated in the EIR.

The cited “error” report would not modify the evaluation of project impacts. It should be noted, however, that “fair share” calculations will be revised in conjunction with development of the mitigation monitoring program or with the project development agreement because of the change (Letter 85, Response 85.1I) in traffic volumes. “Fair share” calculations are not essential to CEQA evaluation.

**Response 104L:** The comment is noted and incorporated in the EIR.

Please see Comment Letter 85 (Caltrans), Response 85.1G.

**Response 104M:** The comment is noted and incorporated in the EIR.

The PRDEIR does not propose deferral of mitigation measures. It assumes timely implementation of proposed measures by both the County and other affected jurisdictions.

**Response 104N:** The comment is noted and incorporated in the EIR.

The proposed TA site access/circulation modifications are, from a CEQA definition standpoint, mitigation measures to further substantially reduce safety, queuing, and road capacity impacts of the project on Knighton Road (see page 1-27 of the PRDEIR and page 3.12-66 and -67 of Appendix A of the PRDEIR).

With respect to the expressed TA site ownership/mitigation measure feasibility concern, please see Comment Letter 85, Response 85.1G and Comment Letter 92.

Figures 3.12-17 and 3.12-18 show the traffic volumes and operations for the revised TA access on Knighton Road for existing plus project and cumulative plus project conditions, respectively. These are mitigation measures proposed for Impact #3.12-8. The PRDEIR does not propose deferral of mitigation measures essential to correct identified impacts.

The traffic analysis was based on the Knighton Road traffic signals being coordinated as part of a corridor system.

# Churn Creek Meadow Organic Farm

www.ccmof.com  
19662 Osceola Ct, Redding, CA 96002

RECEIVED

JAN 28 2011

COUNTY OF SHASTA  
PERMIT COUNTER

Shasta County Dept of Resource Management  
Planning Division  
Attn: Lisa Lozier, Senior Planner  
1855 Placer St, Suite 103  
Redding, CA 96001

January 28, 2011

Re: Draft Environmental Impact Report for General Plan Amendment 08-002, Zone  
Amendment 08-003, Knighton & Churn Creek Commons Retail Center  
Partially Recirculated DEIR Comments.

Dear Ms. Lozier,

I have read the Draft Environmental Impact Report (DEIR) regarding the above  
referenced project and offer the following comments:

**General Plan:**

The proposed project is inconsistent with the General Plan policy on "access control." The segment of Knighton Road between the Northbound 1-5 Off-ramp and Churn Creek Road is 710 feet and Knighton Road will serve as an arterial roadway by nature of the interchange at 1-5. Proper access control would prohibit full access driveways on this segment of Knighton Road. Further, by deferring the improvements identified as mitigation measures is inconsistent with General Plan policy 6-CI, as described on Page 3.12-11 of the RDEIR.

A

**Traffic:**

The RDEIR indicates "existing" traffic data taken from several sources - including some as old as 6 years. Traffic volumes as old as 2004 are not likely to accurately reflect current traffic conditions and should be updated. It also states the typical Saturday midday traffic peaks occur between 11:00 AM and 1:00 PM. This may not be the case on Saturdays, when traffic typically peaks between 2:00 PM and 4:00 PM. The RDEIR assumes an internal trip reduction of approximately 23 percent for PM Peak hour and 29 percent or Midday Saturday. These values are very high for internal trip reduction. Standard methods developed by the Institute of Transportation Engineers (ITE) uses a reduction rate of 20 percent for the PM Peak hour.

B

The traffic studies for the mall show that Knighton Road between Churn Creek Road and Interstate 5 - the main route to potential new stores - as well as the freeway onramps

C

would hit "Level of Service F." And an "F" means the same thing in the traffic studies as it does in an economics class. The roads, in brief, would fail.

C cont.

The mitigation measures regarding traffic are not adequate. There would be gridlock in the entire roadway system around the development. The trucks from the TA already block the intersection on a regular basis, adding this large retail center in a very short section of roadway, then adding lanes going down Churn Creek Road across the street from rural homes would be very disturbing for the rural area. This project is inappropriate for this rural community.

D

The recirculated DEIR calls for the TA truck stop to alter it's exit for the semi trucks:

" Currently, approximately 100 trucks access (enter or exit) the TA site from Knighton Road during the weekday p.m. peak hour. The proposed circulation plan reroutes trucks exiting the site onto Churn Creek Road-Pacheco Road, resulting in approximately 40 trucks using Churn Creek Road-Pacheco Road during the weekday p.m. peak hour."

This is extremely concerning for the following reasons:

1. The Pacheco School drop off and pick up point for parents is accessible from Pacheco Road and this proposed change to the TA truck stop will put those parents and children in a potentially more dangerous position.
2. The TA would loose some of it's parking causing more trucks to park on the roadways during the closures of I-5 due to weather conditions, which occur at least once or twice per year. The TA needs all of it's current parking.
3. When the Truck Stop was given the approval by the County, one of the mitigation measures was to build a sound wall on the East side. This sound wall was to mitigate the noise from the Truck Stop. This need is still there. With the potential addition of this project, the impacts from the TA do not diminish.
4. The families which live on Pacheco Road would be adversely affected by this change to the sound wall and exit routes for trucks with regard to safety, noise and general feeling of privacy.
5. The homes and school have been in this rural community longer than either of these projects and should not be forced to have less rights in order to accommodate another large commercial project.

E

The development would also have a hazardous effect on I-5, causing gridlock and safety concerns. This has not been adequately addressed. A level F is ridiculous.

F

### Conclusion

Since 1975 Churn Creek Bottom has been the subject of many attempts at rezoning. The proximity to Redding and Interstate 5 have given developers incentive to purchase and convert the prime farmland to commercial enterprises.

G

There are better areas in Shasta County for these stores. There are empty buildings, where the infrastructure and traffic signals and planning have already been put in place. This agricultural community does not have the sewer or roadways for this project. Please

do not push this project forward in order to pull tax dollars away from the Cities who have the appropriate services.

As an organic farmer, who derives income from farming on this Class I and Class II soil, on two parcels in Churn Creek Bottom, I feel strongly about maintaining the agricultural zoning.

Prime farmland is a natural resource that Shasta County needs and there is an overwhelming public need to maintain the agricultural zoning. As this community grows and becomes more health conscience with involvement from First 5 Shasta, Healthy Shasta, Mercy Medical Center and other Health minded groups, there will be an increased need for locally grown produce and meat.

Please put the health of the community first, a healthy community is not on the list of objectives for this project.

Sincerely,



Mary Ocasion  
Churn Creek Meadow Organic Farm  
(530) 226-0903

cc Shasta County Board of Supervisors  
1450 Court St, Room 308 B  
Redding, CA 96001

G cont.

**Letter 105: Mary Ocasion, Churn Creek Meadow Organic Farm**

**Response 105A:** The comments are noted and incorporated in the EIR.

Please refer to the response to Comment 98B.

**Response 105B:** Please refer to the response to Comment 98C.

**Response 105C:** Please refer to the response to Comment 98D.

**Response 105D:** The timely implementation of the proposed mitigation measures, including Measure #3.12-8, would as projected by the traffic consultant not result in Level of Service (LOS) F conditions at area roadways or their intersections. The addition of travel lanes to Churn Creek Road from the northerly project access to Knighton Road is proposed.

**Response 105E:** Please see Comment Letter 103, Response 103B (regarding school drop-off area).

There has been no evidence introduced which would indicate a loss of parking for the TA site.

Please see Comment Letter 92, Response 92E with respect to noise abatement.

Subcomments 4. and 5. are acknowledged.

**Response 105F:** The mitigated project would not result in Level of Service (LOS) F on I-5.

**Response 105G:** The comments are acknowledged.

LETTER 106

Shasta County Dept of Resource Management

Planning Division

Attn: Lisa Lozier, Senior Planner

1855 Placer St, Suite 103

Redding, CA 96001

RECEIVED  
SHASTA COUNTY

JAN 31 2011

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

January 28, 2011

Re: Draft Environmental Impact Report for General Plan Amendment 08-002, Zone Amendment 08-003, Knighton & Churn Creek Commons Retail Center

Partially Recirculated DEIR Comments.

Dear Ms. Lozier:

Regarding the Draft Environmental Impact Report at Knighton and Churn Creek:

The proposed project is inconsistent with the General Plan policy on "access control." The segment of Knighton Road between the Northbound 1-5 Off-ramp and Churn Creek Road is 710 feet and Knighton Road will serve as an arterial roadway by nature of the interchange at 1-5. Proper access control would prohibit full access driveways on this segment of Knighton Road. Further, by deferring the improvements identified as mitigation measures is inconsistent with General Plan policy 6-C1, as described on Page 3.12-11 of the RDEIR.

A

Regarding Traffic:

The traffic data is not done adequately: "existing" traffic data taken from several sources - including some as old as 6 years. Traffic volumes as old as 2004 are not likely to accurately reflect current traffic conditions and should be updated. It also states the typical Saturday midday traffic peaks occur between 11:00 AM and 1:00 PM. This may not be the case on Saturdays, when traffic typically peaks between 2:00 PM and 4:00 PM. The RDEIR assumes an internal trip reduction of approximately 23 percent for PM Peak hour and 29 percent or Midday Saturday. These values are very high for internal trip reduction. Standard methods developed by the Institute of Transportation Engineers (ITE) uses a reduction rate of 20 percent for the PM Peak hour.

B

The traffic studies for the mall show that Knighton Road between Churn Creek Road and Interstate 5 - the main route to potential new stores - as well as the freeway onramps would hit "Level of Service F." And an "F" means the same thing in the traffic studies as it does in an economics class. The roads, in brief, would fail.

C

The mitigation measures regarding traffic are not adequate. There would be gridlock in the entire roadway system around the development. The trucks from the TA already block the intersection on a regular basis, adding this large retail center in a very short section of roadway, then adding lanes going down Churn Creek Road across the street from rural homes would be very disturbing for the rural area. This project is inappropriate for this rural community.

D

The recirculated DEIR calls for the TA truck stop to alter it's exit for the semi trucks:

As it stand now, approximately 100 trucks access (enter or exit) the TA site from Knighton Road during the weekday p.m. peak hour. The proposed circulation plan reroutes trucks exiting the site onto Churn Creek Road-Pacheco Road, resulting in approximately 40 trucks using Churn Creek Road-Pacheco Road during the weekday p.m. peak hour."

E

This presents the following problems:

1. The Pacheco School drop off and pick up point for parents is accessible from Pacheco Road and this proposed change to the TA truck stop will put those parents and children in a potentially more dangerous position.
2. The TA would lose some of its parking causing more trucks to park on the roadways during the closures of I-5 due to weather conditions, which occur at least once or twice per year. The TA needs all of its current parking.
3. When the Truck Stop was given the approval by the County, one of the mitigation measures was to build a sound wall on the East side. This sound wall was to mitigate the noise from the Truck Stop. This need is still there. With the potential addition of this project, the impacts from the TA do not diminish.
4. The families which live on Pacheco Road would be adversely affected by this change to the sound wall and exit routes for trucks with regard to safety, noise and general feeling of privacy.
5. The homes and school have been in this rural community longer than either of these projects and should not be forced to have less rights in order to accommodate another large commercial project.

The development would also have a hazardous effect on I-5, causing gridlock and safety concerns. This has not been adequately addressed. A level F is ridiculous.

Final Thoughts:

Many attempts to develop and rezone Churn Creek Bottom have been attempted. This prime farm area has had many suggest industrial sized commercial developments, which truly are not suited to this area.

There are many large buildings sitting empty in current commercial areas and closer to dense populations that would be far superior for this type of development. These other areas already have adequate infrastructure which Churn Creek does not.

Stop the sprawl. Infill is the way of the future. Do not push this in this age of cut-backs and recession. It simply is not what the Redding area needs!

Good agricultural land is scarce and becomes more important as our populations increase. I as an urban Redding dweller feel it is imperative to protect our good soils and maintain our agricultural lands.

To maintain and improve air quality and reduce our carbon footprint we need to encourage agriculture close to our suburban and urban populations.

Please put the health of the community first, a healthy community is not on the list of objectives for this project.

Sincerely,

Annette Faurote

1055 East St

Redding, CA 96001

cc Shasta County Board of Supervisors

1450 Court St, Room 308 B

Redding, CA 96001



E cont.

F

G

**Letter 106: Annette Faurote**

**Response 106A:** The comment is noted and incorporated in the EIR.

With respect to General Plan Policy C.6d relating to access control, please see Comment Letter 104, Response 104F. The PRDEIR does not propose deferral of mitigation measures.

**Response 106B:** The comment is noted and incorporated in the EIR.

Please see Comment Letter 96, Response 96B with respect to data adequacy, Letter 98, Response 98C with respect to Saturday traffic peaks, and Letter 85, Response 85.1H with respect to estimation of internal trips.

**Response 106C:** The comment is noted and incorporated in the EIR.

The PRDEIR proposes mitigation measures to maintain all Levels of Service (LOS) above F.

**Response 106D:** The comment is noted and incorporated in the EIR.

**Response 106E:** The comment is noted and incorporated in the EIR.

**Response 106F:** The comment is noted and incorporated in the EIR.

**Response 106G:** The comments are acknowledged. The comment does not relate directly to traffic impacts, the subject of the PRDEIR.

LETTER 107

RECEIVED  
SHASTA COUNTY

JAN 31 2011

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

January 28, 2011

Lisa Lozier, AICP, Senior Planner, Shasta County  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001  
Phone: (530) 225-5532

Re: Comments on Partially Re-circulated Draft Environmental Impact Report for Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

This letter comments on the Partially Re-circulated Draft Environmental Impact Report dated December 2010 (RDEIR), for the Knighton & Churn Creek Commons Retail Center (Project).

The RDEIR acknowledges that the Project will result in substantial increases in traffic at the Knighton Road/I-5 interchange, as well as on existing surface streets and regional circulation facilities. The following paragraphs further identify problems and inconsistencies in the RDEIR:

**General Plan**

The proposed project is inconsistent with the General Plan policy on "access control." The segment of Knighton Road between the Northbound 1-5 Off-ramp and Churn Creek Road is 710 feet and Knighton Road will serve as an arterial roadway by nature of the interchange at 1-5. Proper access control would prohibit full access driveways on this segment of Knight Road. Further, by deferring the improvements identified as mitigation measures is inconsistent with General Plan policy 6-CI, as described on Page 3.12-11 of the RDEIR.

**Traffic Data**

The RDEIR indicates "existing" traffic data taken from several sources - including some as old as 6 years. Traffic volumes as old as 2004 are not likely to accurately reflect current traffic conditions and should be updated. It also states the typical Saturday midday traffic peaks occur between 11:00 AM and 1:00 PM. This may not be the case on Saturdays, when traffic typically peaks between 2:00 PM and 4:00 PM. The RDEIR assumes an internal trip reduction of approximately 23 percent for PM Peak hour and 29 percent on Midday Saturday. These values

A

B

are very high for internal trip reduction. Standard methods developed by the Institute of Transportation Engineers (ITE) uses a reduction rate of 20 percent for the PM Peak hour.

B cont.

**Level Of Service (LOS)**

The traffic studies for the mall show that Knighton Road between Churn Creek Road and Interstate 5 - the main route to potential new stores - as well as the freeway onramps would hit "Level of Service F." And an "F" means the same thing in the traffic studies as it does in an economics class. The roads, in brief, would fail.

C

**Truck Stop**

The proposed project indicates a reconfiguration of the access points along Knighton Road to accommodate site circulation for the proposed project and the TA truck stop to improve safety along Knighton Road. As such, the proposed improvements at the truck stop must be included in the project description of the DEIR and all impact analyses included in the DEIR and RDEIR must evaluate the truck stop improvements.

D

Identifying improvements to the truck stop requires improvements to be constructed on private property that may not be controlled by the owner of the proposed project. As such, there is no way to know if permission will be granted by the owner of the truck stop to allow the identified improvements.

**School Impact**

The RDEIR does not adequately analyze the Project's potential impacts to schools. It does not assess impacts to schools resulting from increased traffic due to the Project, and fails to provide for appropriate mitigation measures.

E

Potential impacts to schools include, but are not limited to, increased risk of injury to students from traffic accidents, ingress/egress problems at student pick-up and drop-off times, disruption of established school bus routes, and increased noise interfering with classroom and recreational activities. These potential impacts should be identified and assessed.

**Financial Responsibility**

The RDEIR does not indicate when improvements funded by the fee programs will be implemented. Given the current economic climate for new development, and depending on the current financial status of those fee programs, mitigation measures for the proposed project may not be implemented for years after occupancy is allowed at the proposed project. This will result

F

in the project causing severely congested conditions and safety hazards at numerous locations in the project study area.

The RDEIR indicates the proposed project will create significant impacts at the Northbound and Southbound 1-5 off-ramp intersections at Knighton Road. Deferring signalization of these intersections will result in significant congestion at those locations. This congestion could, in turn, result in vehicle queuing on the I-5 off-ramp that extends to the freeway mainline. Vehicle queuing that extends to the freeway mainline creates a severe traffic hazard.

F cont.

**Conclusion**

This project will increase traffic counts, reduce the Level of Service at some locations to unacceptable. Full funding for the required improvements is not currently available – thus going forward with this project without securing the funds necessary to mitigate these issues exacerbates the LOS and safety conditions. A decision to approve such a project runs against common sense, precedent and the county's General Plan.

G

Sincerely,



***Letter 107: W. S. Swanson***

**Response 107A:** The comments are noted and incorporated in the EIR.

Please see Comment Letter 98, Responses 98A - 98G.

**Response 107B:** See Responses 107A.

**Response 107C:** See Responses 107A.

**Response 107D:** See Responses 107A.

**Response 107E:** See Responses 107A.

**Response 107F:** See Responses 107A.

**Response 107G:** See Responses 107A.

**Gregory A. Unger  
19870 Holstein Ln.  
Redding, CA 96002**

**LETTER 108**

January 28, 2011

**RECEIVED**  
SHASTA COUNTY

Lisa Lozier, AICP, Senior Planner, Shasta County  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001  
Phone: (530) 225-5532

JAN 31 2011

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

Re: Comments on Partially Re-circulated Draft Environmental Impact Report for Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

This letter comments on the Partially Re-circulated Draft Environmental Impact Report dated December 2010 (RDEIR), for the Knighton & Churn Creek Commons Retail Center (Project).

The RDEIR acknowledges that the Project will result in substantial increases in traffic at the Knighton Road/I-5 interchange, as well as on existing surface streets and regional circulation facilities. The following paragraphs further identify problems and inconsistencies in the RDEIR:

**General Plan**

The proposed project is inconsistent with the General Plan policy on "access control." The segment of Knighton Road between the Northbound 1-5 Off-ramp and Churn Creek Road is 710 feet and Knighton Road will serve as an arterial roadway by nature of the interchange at 1-5. Proper access control would prohibit full access driveways on this segment of Knight Road. Further, by deferring the improvements identified as mitigation measures is inconsistent with General Plan policy 6-CI, as described on Page 3.12-11 of the RDEIR.

A

**Traffic Data**

The RDEIR indicates "existing" traffic data taken from several sources - including some as old as 6 years. Traffic volumes as old as 2004 are not likely to accurately reflect current traffic conditions and should be updated. It also states the typical Saturday midday traffic peaks occur between 11:00 AM and 1:00 PM. This may not be the case on Saturdays, when traffic typically peaks between 2:00 PM and 4:00 PM. The RDEIR assumes an internal trip reduction of approximately 23 percent for PM Peak hour and 29 percent on Midday Saturday. These values are very high for internal trip reduction. Standard methods developed by the Institute of Transportation Engineers (ITE) uses a reduction rate of 20 percent for the PM Peak hour.

B

**Level Of Service (LOS)**

The traffic studies for the mall show that Knighton Road between Churn Creek Road and Interstate 5 - the main route to potential new stores - as well as the freeway onramps would hit "Level of Service F." And an "F" means the same thing in the traffic studies as it does in an economics class. The roads, in brief, would fail.

C

**Truck Stop**

The proposed project indicates a reconfiguration of the access points along Knighton Road to accommodate site circulation for the proposed project and the ~~TA truck stop to improve safety~~ along Knighton Road. As such, the proposed improvements at the truck stop must be included in the project description of the DEIR and all impact analyses included in the DEIR and RDEIR must evaluate the truck stop improvements.

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Potential impacts to schools include, but are not limited to, increased risk of injury to students from traffic accidents, ingress/egress problems at student pick-up and drop-off times, disruption of established school bus routes, and increased noise interfering with classroom and recreational activities. These potential impacts should be identified and assessed.

**Financial Responsibility**

The RDEIR does not indicate when improvements funded by the fee programs will be implemented. Given the current economic climate for new development, and depending on the current financial status of those fee programs, mitigation measures for the proposed project may not be implemented for years after occupancy is allowed at the proposed project. This will result in the project causing severely congested conditions and safety hazards at numerous locations in the project study area.

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turn, result in vehicle queuing on the I-5 off-ramp that extends to the freeway mainline. Vehicle queuing that extends to the freeway mainline creates a severe traffic hazard.

F cont.

**Conclusion**

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G

Sincerely,



**Letter 108: Gregory A. Unger**

**Response 108A:** The comments are noted and incorporated in the EIR.

Please see Comment Letter 98, Responses 98A - 98G.

**Response 108B:** See Responses 108A.

**Response 108C:** See Responses 108A.

**Response 108D:** See Responses 108A.

**Response 108E:** See Responses 108A.

**Response 108F:** See Responses 108A.

**Response 108G:** See Responses 108A.

RECEIVED

JAN 31 2011

COUNTY OF SHASTA  
PERMIT COUNTER

January 28, 2011

Lisa Lozier, AICP, Senior Planner, Shasta County  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001  
Phone: (530) 225-5532

Re: Comments on Partially Re-circulated Draft Environmental Impact Report for Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

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**Conclusion**

This project will increase traffic counts, reduce the Level of Service at some locations to unacceptable. Full funding for the required improvements is not currently available – thus going forward with this project without securing the funds necessary to mitigate these issues exacerbates the LOS and safety conditions. A decision to approve such a project runs against common sense, precedent and the county's General Plan.

G

Sincerely,

*Phyllis Fowler*  
4009 Chum Creek Rd  
Reddy, Ca 96002

***Letter 109: Phyllis Lawler***

**Response 109A:** The comments are noted and incorporated in the EIR.

Please see Comment Letter 98, Responses 98A - 98G.

**Response 109B:** See Responses 109A.

**Response 109C:** See Responses 109A.

**Response 109D:** See Responses 109A.

**Response 109E:** See Responses 109A.

**Response 109F:** See Responses 109A.

**Response 109G:** See Responses 109A.

RECEIVED

JAN 30 2011

COUNTY OF SHASTA  
PERMIT COUNTER

January 29, 2011

Michael C. Mitchell  
2089 Hacienda Street  
Redding, CA 96003

Lisa Lozier,  
AICP, Senior Planner, Shasta County  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001

**Re: Comments on Partially Re-Circulated Draft Environmental Impact Report for Knighton & Churn Creek Commons Retail Center**

Dear Ms. Lozier:

Thank you for the opportunity to respond to the re-circulated draft DEIR on the Knighton & Churn Creek Commons Retail Center project. I also appreciated the opportunity to speak with you recently by telephone on my concerns about the coordinated efforts by both the Shasta County and City of Redding planning departments. I would like to recap the key points of my discussion with you for the record. These comments are in addition to my concerns addressed in a letter sent to you on December 27, 2009. (attached)

A

**Traffic and Circulation Coordination between Shasta County and the City of Redding.**

There appears to be a lack of comprehensive effort between Shasta County and the City of Redding planning departments on traffic studies and the future traffic infrastructure plans and needs related to this project proposal. A specific example is the long term traffic problems associated with vehicle travel from within the Redding city limits into Shasta County on Churn Creek Road.

Since July, 2006, the City of Redding, Development Services Department has recommended that a "round-a-bout" be constructed at the Churn Creek/Rancho/ Victor intersection to improve traffic circulation and public safety. The city department and the planning commission has revisited this need on four substantial projects proposals in the area since 2006.

B

These projects are:

- Shastina Ranch Subdivision (Palmar Homes)**
- Stonefair Subdivision (Palmar Homes)**
- Vitalis Shopping Center (Churn Creek/Bonneyview)**
- Lewis-Pipgras Shopping Center (Rancho/Shasta View)**

All of these project approvals remain valid and are conditioned to **require that any one individually triggers a requirement** for implementing the round-a-bout improvement at this congested site. (Doug Demallie, City of Redding Planning Division, 11/19/2010)  
The round-a-bout is a projected \$2.5 million project and City staff has encouraged these project developers and other benefitting property owners to consider a joint effort toward its construction. It appears that the Hawkins project is not included in this joint effort discussion simply because it is not within the jurisdictional boundaries of the City of Redding.

I would like to direct your attention to the Hawkins project re-circulated traffic circulation section mitigation measure #3.12; Page 3.12-40.

**Churn Creek Road/Rancho Road: Improve the intersection to add a traffic signal. This improvement will result in LOS C operations during the weekday PM peak hour and LOS B operations during the Saturday mid-day peak hour at the intersection.**

The question needs to be asked why the Hawkins project is not being included in the established need to vastly improve, (round-a-bout) the recognized long term problem at this critical intersection. It has already been acknowledged in the re-circulated DEIS that the Hawkins project will have an impact on the traffic flow at this intersection.

B cont.

I realize that this area encompasses land within the boundaries of the City of Redding and Shasta County. However, it would seem only logical that both the respective county city planning departments should be communicating and coordinating joint efforts for the overall need of the public in the long term. The public expects this kind of effort by it's elected officials and public staff.

Although I am not opposed to any new commercial or residential development in the Churn Creek area, I cannot support a project which does not adequately address and mitigate the existing and future traffic problems in the affected area.

I encourage you and your staff to enter into more comprehensive dialog and analysis with the City of Redding to resolve traffic and circulation issues that have direct impacts within both jurisdictions. The Churn Creek/Rancho/Victor intersection appears to be one of those site specific situations where both jurisdictions are not working in a comprehensive and cost effective effort for the public good.

C

Sincerely,

MICHAEL C. MITCHELL

CC: Les Baugh, Shasta County Board of Supervisors

Attachments: Letter/December 27, 2009

December 27, 2009

Michael C. Mitchell  
8384 Churn Creek Road  
Redding, CA 96002

Ref: DEIR: Hawkins Development  
Company

Ms. Lisa Lozier, Senior Planner  
County of Shasta  
Department of Resource Management  
1855 Placer Street, Suite 103  
Redding, CA 96001

Dear Ms. Lozier:

Thank you for the opportunity to respond to the Draft Environmental Impact Report, (DEIR) on the commercial development proposed by the Hawkins Development Company and submitted to the County of Shasta for consideration.

As the owner of residential property within the proposed project area and as a retired environmental resource planner with the USDA, Forest Service, I have a keen interest in general planning efforts and specifically this project proposal.

I have reviewed the DEIR and have serious concerns about the proposed mitigation measures to resolve unacceptable existing and anticipated traffic issues within the project area. Although my concerns are broad, I would like to narrow my comments to the mitigation measures addressed in the traffic study on Churn Creek Road. Specifically, the area between Knighton Road and I-5 north including Rancho Road. (#3.12-5d)

The intersection of Churn Creek Road/Rancho Road/Victor Ave is immediately adjacent to the residential home I have owned since 2002. (Assessor's Parcel # 055-450-014). Beginning in 2006, I have expressed my concerns about the unacceptable levels of existing traffic delays and hazards on Churn Creek Road and at this intersection. I have been in contact directly with the City of Redding, Douglas Demallie, Senior Planner, his staff, and most recently appeared before the Redding Planning Commission, (12/9/08) to voice my concerns about needed improvements to Churn Creek Road between I-5 and Rancho Road. My most recent appearance was to voice my concerns about the proposed Vitalis Partners, Bonnyview Retail Center and the impacts on Churn Creek Road.

Since 2006, the City of Redding and County of Shasta have been working together to develop a new intersection at Churn Creek Rd./Rancho Rd./Victor Ave. (Attachment: Phase 1 Roundabout Alternative) Implementation of this project has been delayed and postponed due to a variety of changing economic and financial conditions which are a

matter of public record. Unfortunately, the current traffic and hazards associated with this intersection continue to increase. Since before 2006, the existing condition has been determined to be unacceptable by city and county planners and is identified as such within the DEIR for this commercial development.

The proposed mitigation measure for this intersection appears to be the installation of a traffic signal at Rancho and Churn Creek Road. My question is why the previously determined need to construct a new intersection has not been referenced or addressed in the DEIR for the Knighton commercial project proposal? It appears that the future traffic mitigation needs associated with the new Stillwater Park, the Bonneyview Retail Commercial project, proposed residential development on Rancho Road, and other planned projects are not being considered with the Hawkins project. Installation of a sole traffic signal would not solve the existing unacceptable conditions but might exasperate the overall traffic flow problems that already exist at this location.

Although I am not opposed to any new commercial development in the Churn Creek Bottom area, I cannot support a project which does not adequately address and mitigate the existing and future traffic problems in the affected area.

I encourage you and your staff to address the potential consequences of the traffic related impacts of the project proposal and this site specific intersection before a recommendation is presented to the Shasta County Planning Commission and the Shasta County Board of Supervisors.

Sincerely,

**Michael C. Mitchell**

CC: Les Baugh, Shasta County Board of Supervisors

**Letter 110: Michael C. Mitchell**

**Response 110A:** The comments are noted and incorporated in the EIR.

The comments in the attached letter of December 27, 2009 are essentially duplicative of those in the transmittal letter; no separate responses are required.

**Response 110B:** The comments are noted and incorporated in the EIR.

Please see Comment Letter 90, Response 90B.

**Response 110C:** The comments are noted and incorporated in the EIR.

The County of Shasta will continue to cooperate with the City of Redding wherever it is feasible to coordinate traffic planning efforts.

Shasta County Department of Resource  
Management, Planning Division  
1855 Placer St., Suite 103  
Redding, CA 96001

RECEIVED  
SHASTA COUNTY

JAN 31 2011

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

Attention: Lisa Lozier, Senior Planner

In reviewing the material for the Hawkins Development and discussing it with Jason Provence, Principal of the Pacheco School, I have a significant concern as to how the new proposed exit for the T.A. Truck Stop will affect the students at the school. The sound wall has been destroyed in part which has allowed transients to more easily get access to the school. This has posed issues of security and sanitation. If the Hawkins Development is allowed to be developed off Knighton Road it will give the transients far easier access to the school. I have had a long association with the Pacheco School and am very concerned about this issue.

A

Molly Cole  
7399 Dilley Lane  
Redding, CA 96001

***Letter 111: Moly Cole***

**Response 111A:** The comment is noted and incorporated in the EIR.

Please see Comment Letter 92, Response 92B and Letter 103, Responses 103B and 103E.

# CHRISTIAN M. CARMONA

Post Office Box 992796  
Redding, CA 96099-2796  
(530) 524-2626

19397 Smith Road  
Redding, CA 96002

RECEIVED

JAN 31 2011

COUNTY OF SHASTA  
PERMIT COUNTER

Monday, January 31, 2011

Lisa Lozier, AICP, Senior Planner  
County of Shasta  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, CA 96001

RE: Comments on the Partially Recirculated Draft Environmental Impact Report for the Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

This letter provides comments on the Partially Recirculated Draft Environmental Impact Report for the Knighton & Churn Creek Commons Retail Center, file numbers GPA08-002 and Z08-003.

In my letter dated March 04, 2009 addressing the Environmental Impact Report and which is contained in Appendix A of the report, are concerns that were not addressed in the report.

As the current President of the Pacheco Board of Trustees, I have responsibilities to the children, parents, and staff to make certain our school is safe and will be able to sustain a viable learning environment. Item 4 of my March 04, 2009 is below:

- 4) *Please address the negative impacts to Pacheco School relative to traffic, safety, and declining enrollment. The traffic generated by the project will significantly impact the school in a negative manner. The traffic circulation will create delays which will adversely affect a parent's willingness to transport their children to the school. How many students are inter-district transferred or do not utilize the busing system? Are there restrictions imposed on new development by the California Department of Education on*

A

B

*what types of goods and/or business operations are acceptable within a certain proximity to an elementary school?*

The last sentence is an important one because when looking at the Hawkins Development's website, it appears that one of their largest customers is a sporting goods store commonly known for selling firearms, weapons, and ammunition. I would hope that restrictions on any development selling these types of goods so close to a school would be prohibited.

The Recirculated Draft also suggests that the trucks leaving the TA Truck Stop will be exiting onto Pacheco Road. The school has a newly constructed drop off and pickup site on Pacheco School Road. Secondly, when the truck stop was built, there were restrictions imposed as a condition of development to make sure the safety wall would stay intact. The wall is an important sound barrier, fume barrier, and safety feature. The current state of the wall is in disrepair and the school has diligently attempted to have the truck stop repair the wall and maintain it according to the provisions imposed on them during development without success. Transients who obtain rides from truck drivers walk through the broken wall and have been found sleeping in the hallways of our school. This is an extreme safety concern and the wall needs to be maintained accordingly.

Sincerely,

  
Christian M. Carmona  
(530) 524-2626

B cont.

C

## Pacheco Union Elementary School District Centennial . . . A Continuing Epoch

Churn Creek Bottom, or Churn Creek Valley, as the residents of this area refer to it, was settled in the early 1800's. Some of the early settlers were the families of Tracy, Logan, Harris, Parsons, Deakins, Hampton, Dinsmore, MacFarland, Love, Howard, Schaub, Saxon, McKinnon, Beach, Robinson, Pool, Edge, Brimmer, Hill, and Weir. Descendants of these early families still live in Shasta County and take part in its growth and progress.

These first settlers contributed greatly to Shasta County's agriculture, history, education, and culture. We are particularly interested in the development of education in Churn Creek Valley.

Before 1875, school was held in private homes in the valley. The teacher boarded with various families, one week at a time. School would be held at the home where the teacher boarded that week, then on to another home the following week. Records of the school and its affairs are somewhat vague, and there are many gaps in the accounts as to dates and activities.

A step forward was made as to school housing when a hog barn was converted into a school house and a bell for the building was purchased in 1875. This school house was on the Jim Beach ranch. Due to the manner in which the building was constructed, the hogs could enter the place at night and sleep there. Water for school use had to be carried in buckets from a ranch a quarter of a mile away. It was mainly on account of the hogs' night quarters that the three-member school board decided that a new school house was in order.

Land values were low. Taxes at that time were \$1.50 per \$100 valuation. Money needed for the new school building would be between \$55 and \$1500. Even this low estimate seemed huge to many residents. There was much opposition to the proposed bond. A bond on the district had to be passed to secure funds for the new building. The majority of the people in the district thought that if they just didn't vote, the bond would fail. These people didn't vote, but five favorable votes were cast and the bond carried.



The new school-house was built on a site donated by the Isaac C. Morgan family about half way down the valley. The construction of the school-house was started in 1883 and was completed in 1884. A Mr. Logan was a board member at this time; and near the completion of the structure, a school official was a guest at the Logan home one evening. During the course of the evening's conversation, the topic of the new school arose. Up to this time, the area had no official name. Mrs. Logan suggested that the school district be named in honor of General Pacheco who was governor of California for a short time. The suggestion was favorably received, and in 1884 the Clearn Creek area became Pacheco School District.

The building was a white, one-room frame structure with high and long old-fashioned windows on the south and north sides. It had a belfry which held the large bell. The bell was rung each morning at 8:30 a.m. by the janitor, and by the teacher at 9:00 a.m. to call the class to order. Old-timers remember the bell being used as a fire alarm or as a help signal.

The school-house was heated by a large wood furnace with pipes hanging from the ceiling to carry heat throughout the room. Later, with volunteer labor, the furnace was replaced by a pot-bellied stove.

With the building of Shasta Dam and the general advancement of Shasta County, people demanded better educational facilities. In the wake of these newer educational demands, the one-teacher school was doomed. In many cases, it was found that there were not enough children in a district to open a full term of school. The few children in such a district were transported to an adjoining district. These small schools were very expensive to operate and often didn't have the best facilities. As time went on, more and more small schools were annexed to larger and better equipped school districts. Prairie District, which lay south of Pacheco, was the first to be annexed to Pacheco. This was on January 16, 1931. Pacheco District now became Pacheco UNION School District.

Like the original Pacheco District, the Prairie District had many early-day settlers who were the founders of the Prairie community. Family names such as St. Vrain, Stevenson, Stennison, Craven, Dillon, Severtson, and others, were among the first settlers in that area.

The trend to phase out the smaller districts continued, and in July, 1963, the Sacramento River District, established in 1863, which is east of Pacheco, was annexed to the new union district. The following December, the Pacheco Union School District Board of Trustees voted to accept any portion of the Parkville District. This district lay farther east and south of Pacheco. The annexation date notice by the Shasta County Board of Supervisors was March 2, 1964. Names like Beattie, Jensen, McMullen, Reed, Halesman, McWhennle, Ross, Brightman, Rollison, Kimey, Peacock, Leas, Daymon, Vestal, Hickman, Lack, Dersch, and Hawes were some of the early settlers in these areas. These people and their descendants have made, and are still making, great contributions to Pacheco Union School District and to Shasta County.

A peculiarity of the Pacheco Union School District is that it is divided between Shasta Union High School District and Anderson Union High School District. The eighth-grade graduates go in two different directions to high school. Through the years, Pacheco's students have received high scholastic and athletic honors in both schools.

Today, Pacheco Union School District covers about twenty-five square miles in area. There are two school plants. One is on the last purchased site of the Pacheco area, and the school is known as the Pacheco School. The other plant is located on the Dersch Road in the Prairie area and is called Prairie School. New land was purchased on which to build this school. Prairie has seven classrooms and one multi-purpose room.

At the Pacheco School, new classroom wings have been added. A multi-purpose room, an additional office, a kindergarten room, and a tool shed have recently been built. The school has a large conditioned play area which is equipped for a well-rounded physical education program.

The district employs thirty-one classroom teachers, one principal, one superintendent, four full time teachers' aides, and eight part time teachers' aides. There are four buses that cover the district for rapid transportation. The maintenance of the plants is done by four custodians. Adequate lunches are served by five cooks. Four secretaries, one of whom is an educational secretary, have charge of the offices.

A well stocked library under the direction of a library aide provides ample reference and reading material for the students. The district contracts for other services for the students from the County Superintendent of Schools Office. The children of Pacheco Union School District have every advantage of children living in metropolitan areas. Pacheco ranks high in scholastic achievements and it carries on several innovative programs at the local, state and federal level.

The year 1975 has been designated as the centennial year for this district. The summation of the progress and development of education through the years in the Pacheco Union School District proves that it is, indeed, a continuing EPOCH.





Thanks to Mrs. Evelyn Mann and Vern Parsons for pictures

Old Pacheco School



Old Timer  
Wm. Logan



Left to Right  
Roy Dealdn  
Ralph Wier  
Roy Thompson  
Willie Deason  
Wayne Parsone



Former  
Pacheco  
Students.

Ralph Wier, Alta Wier, Edge Dinsmore, Wayne Parsons, Louise Logan, Leland Harris,  
Roy Thompson, Edith Harris.

Our thanks to Mrs Richard Roberts, Mrs. Robert Clover and Mr. Vern Parsons  
who worked on the committee which compiled the Facts and History presented here.

The editors.

#### Pacheco School 1928



**Letter 112: Christian M. Carmona**

**Response 112A:** The comments are noted and incorporated in the EIR.

Concerns regarding traffic and traffic safety concerns affecting the school are addressed in the responses to Letters 92 and 103.

**Response 112B:** The comments are noted and incorporated in the EIR.

Although not a traffic-related impact, the District's concern is acknowledged. We know of no such restrictions in State law.

**Response 112C:** The comments are noted and incorporated in the EIR.

The current condition of the wall is not a PRDEIR subject. Please see Comment Letter 103, Responses 103B and 103E.

JAN 31 2011

COUNTY OF SHASTA  
PERMIT COUNTER

Lisa Lozier, AICP, Senior Planner, Shasta County

January 31, 2011

Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001  
Phone: (530) 225-5532  
Re: Partially Re-circulated Draft Environmental Impact Report for Knighton & Churn Creek  
Commons Retail Center

Ms. Lozier:

This project is just as bad as the previous Automall project that was suggested a couple of years ago. I request that all objections to that project both general and specific be attached to this project and this RDEIR, as the location and development are the same and the problems larger.

As many county residents pointed out at that time, this new project also goes against assurances made by the county against further development in the Churn Creek Bottom area. If agreements and assurances made by our representatives are to be thrown out at the whim of every developer why do we have a planning department at all? The county should honor the agreements and the desires of local landowners over developers. Besides this is just a bad idea for the citizens of Shasta County and Redding.

Churn Creek Bottom is some of the finest farm and ranch land in Shasta County. While too much land is already being lost to urban sprawl and our population grow, we need to consider the future value of these lands. They are a valuable resource of local healthy food. In the future, this value will be more apparent and the need to preserve them more important. I ask you to consider a time (like WWII) when these lands may be the source to sustain us in crises. Organic growers and consumers are one of the fastest growing segments of our economy, even in these times. Churn Creek Bottom is perfect for this type of local business.

I'm sure many people have written to you about the traffic, drainage, sewage and other problems associated with this development; so I won't revisit those. I am telling you that this is an ideological problem and a policy problem that exists in our local governments. In better times of consistent growth and abundant funding for infrastructure, and when we had better employment opportunities, maybe then this would make more sense. Now it doesn't. With so much commercial real estate, both land and buildings, being vacant, and prospects for a recovery that will create the jobs not visible in the foreseeable future; how can you believe this development will serve us? The only result will be more urban blight in Redding and more sprawl in the county.

A

The other issue that is not accounted for in the RDEIR is a full CEQA impacts as farm land can sequester carbon if properly managed. The energy and materials used in any infrastructure build-out (road construction, etc.) should also be considered under CEQA when undertaking these types of developments. Traffic congestion results in huge wastes of energy and creates more pollution as trucks and autos use more fuel stopping and starting or waiting at lights.

A cont.

This area also has a elementary school that will be impacted by the noise and pollution of increased traffic. This will most certainly affect the health of the children at the school. This fact and the obvious lack of necessity for another shopping center makes this project and its related problems only a burden on the community.

Thank you for your attention,

Douglas Bennett

P.O. Box 579

Bella Vista, CA 96008

**Letter 113: Douglas Bennett**

**Response 113A:** The comments are acknowledged and incorporated in the EIR. It is noted that they are not traffic-related and therefore no PRDEIR response is required.

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JAN 31 2011

COUNTY OF SHASTA  
PERMIT COUNTER

January 31, 2011

Shasta County Department of Resource Management,  
Planning Division  
1855 Placer Street, Suite 103  
Redding, CA 96001

Attention: Lisa Lozier, Senior Planner

I have reviewed the DEIR for the Hawkins Shopping Mall at Knighton Road in Churn Creek Bottom. As a retired homeowner, who lives on Churn Creek Road, between Knighton and Rancho Road, I am fortunate to be able to spend a lot of time in my front yard, enjoying the views of the mountains, the turkeys in the field, cows grazing, the birds nesting.

What is not pleasant:

- is having a car come crashing through your yard at 2 a.m., at 80mph+.
- is having people not wanting to slow down for you to make a turn into your driveway.
- is having bumper to bumper traffic (yes, it has increased significantly over the years) and having to smell the exhaust, as they wait behind a school bus, car, big-rig, or UPS/FEDEX to turn onto one of the side roads.
- not being able to enjoy a walk on Churn Creek Road--you lose to the vehicles who mostly speed or don't pay attention while their eating, smoking, talking on the phone, and all else.

*THIS IS TRUE!*

A

What will happen if the Shopping Mall is approved:

- With signal lights at Rancho/Victor, traffic will be backed up to Knighton Road; the traffic exiting the mall onto Churn Creek will cause gridlock. You'll have residents in the Churn Creek Bottom area stopping to turn into their driveways or streets, backing up traffic.
- Emergency vehicles will not be able to get through, even with normal traffic on Churn Creek--there's no place to move over--one way in/one way out--not good planning!
- When our bad weather comes, Interstate 5 will close. Have you witnessed the trucks at the Truck Stop on Knighton? They are lined up and down the freeway, plus all up and down Knighton Road, both sides of the road!
- More people are homeless today, and we have seen an increase of the homeless walking from Win River Casino to the Truck Stop on Knighton. Sometimes they camp under the Churn Creek Bridge, or by the ACID Canal on Churn Creek Road. Since they are not allowed to walk I-5, they use Churn Creek Road, which is dangerous when it's pitch black outside. The Shopping Center will be convenient for them in their time of need to refresh and rest.

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Thank you,



Diane E. Saffen, Homeowner

***Letter 114: Diane E. Saffen***

**Response 114A:** The comment is noted and incorporated in the EIR.

**Response 114B:** The comment is noted and incorporated in the EIR.

The PRDEIR concludes that, given the implementation of the proposed mitigation measures, the cited impacts will not occur.

**Response 114C:** The comment is noted and incorporated in the EIR. It is not related to the traffic impacts evaluated in the PRDEIR.

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JAN 31 2011

COUNTY OF SHASTA  
PERMIT COUNTER

January 31, 2011

Lisa Lozier, Senior Planner, Shasta County  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, Ca. 96001  
Phone: (530) 225-5532

Re: Comments on Partially Re-circulated Draft Environmental Impact Report for  
Knighton & Churn Creek Commons Retail Center Project

Dear Ms. Lozier:

I wish to protest the lack of availability of paper copies of the above-referenced report at both the Redding and Anderson public libraries. The only way one can read the report at these locations is by disk, which then requires the use of a library computer, available to the public only after a lengthy wait for other users to finish their computer tasks.

Your apparent assumption that everyone in the County has the necessary computer skills and the necessary good eyesight to read a lengthy public document on a small computer screen is, at best, presumptuous. The result of this is that many citizens have been denied access to this important document, and have therefore been disenfranchised.

It is my recollection that previous environmental impact reports for the Flying J truck stop and the Auto Mall at this site have allowed the public to view both disks and paper copies at the libraries. Why wasn't this done now?

I therefore request that the County extend the public review period of this document for at least 30 more days and provide paper copies at the libraries. This would give everyone a fair chance!

Sincerely,

Victor Ogrey  
7250 Churn Creek Road  
Redding, Ca. 96002  
(530)-221-3055

A

**Letter 115: Victor Ogrey**

**Response 115A:** The comment is noted and incorporated in the EIR. It is not related to the traffic analyses of the PRDEIR and no response is therefore practical at this time.

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January 31, 2011

JAN 30 2011

COUNTY OF SHASTA  
PERMIT COUNTER

Lisa Lozier, AICP, Senior Planner, Shasta County  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001  
Phone: (530) 225-5532

Re: Comments on Partially Re-circulated Draft Environmental Impact Report for Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

This letter comments on the Partially Re-circulated Draft Environmental Impact Report dated December 2010 (RDEIR), for the Knighton & Churn Creek Commons Retail Center (Project).

The RDEIR acknowledges that the Project will result in substantial increases in traffic at the Knighton Road/I-5 interchange, as well as on existing surface streets and regional circulation facilities. The following paragraphs further identify problems and inconsistencies in the RDEIR:

**General Plan**

The proposed project is inconsistent with the General Plan policy on "access control." The segment of Knighton Road between the Northbound 1-5 Off-ramp and Churn Creek Road is 710 feet and Knighton Road will serve as an arterial roadway by nature of the interchange at 1-5. Proper access control would prohibit full access driveways on this segment of Knight Road. Further, by deferring the improvements identified as mitigation measures is inconsistent with General Plan policy 6-CI, as described on Page 3.12-11 of the RDEIR.

A

**Traffic Data**

The RDEIR indicates "existing" traffic data taken from several sources - including some as old as 6 years. Traffic volumes as old as 2004 are not likely to accurately reflect current traffic conditions and should be updated. It also states the typical Saturday midday traffic peaks occur between 11:00 AM and 1:00 PM. This may not be the case on Saturdays, when traffic typically peaks between 2:00 PM and 4:00 PM. The RDEIR assumes an internal trip reduction of approximately 23 percent for PM Peak hour and 29 percent or Midday Saturday. These values are very high for internal trip reduction. Standard methods developed by the Institute of Transportation Engineers (ITE) uses a reduction rate of 20 percent for the PM Peak hour.

B

**Level Of Service (LOS)**

The traffic studies for the mall show that Knighton Road between Churn Creek Road and Interstate 5 - the main route to potential new stores - as well as the freeway onramps would hit "Level of Service F." And an "F" means the same thing in the traffic studies as it does in an economics class. The roads, in brief, would fail.

C

**Truck Stop**

The proposed project indicates a reconfiguration of the access points along Knighton Road to accommodate site circulation for the proposed project and the TA truck stop to improve safety along Knighton Road. As such, the proposed improvements at the truck stop must be included in the project

D

description of the DEIR and all impact analyses included in the DEIR and RDEIR must evaluate the truck stop improvements.

Identifying improvements to the truck stop requires improvements to be constructed on private property that may not be controlled by the owner of the proposed project. As such, there is no way to know if permission will be granted by the owner of the truck stop to allow the identified improvements.

D cont.

**School Impact**

The RDEIR does not adequately analyze the Project's potential impacts to schools. It does not assess impacts to schools resulting from increased traffic due to the Project, and fails to provide for appropriate mitigation measures.

Potential impacts to schools include, but are not limited to, increased risk of injury to students from traffic accidents, ingress/egress problems at student pick-up and drop-off times, disruption of established school bus routes, and increased noise interfering with classroom and recreational activities. These potential impacts should be identified and assessed.

E

**Financial Responsibility**

The RDEIR does not indicate when improvements funded by the fee programs will be implemented. Given the current economic climate for new development, and depending on the current financial status of those fee programs, mitigation measures for the proposed project may not be implemented for years after occupancy is allowed at the proposed project. This will result in the project causing severely congested conditions and safety hazards at numerous locations in the project study area.

F

The RDEIR indicates the proposed project will create significant impacts at the Northbound and Southbound 1-5 off-ramp intersections at Knighton Road. Deferring signalization of these intersections will result in significant congestion at those locations. This congestion could, in turn, result in vehicle queuing on the I-5 off-ramp that extends to the freeway mainline. Vehicle queuing that extends to the freeway mainline creates a severe traffic hazard.

**Conclusion**

This project will increase traffic counts, reduce the Level of Service at some locations to unacceptable. Full funding for the required improvements is not currently available – thus going forward with this project without securing the funds necessary to mitigate these issues exacerbates the LOS and safety conditions. A decision to approve such a project runs against common sense, precedent and the county's General Plan.

G

Sincerely,



Cynthia and Robert Castner  
20379 River Valley Drive  
Anderson CA 96007

**Letter 116: Robert & Cynthia Castner**

**Response 116A:** The comments are noted and incorporated in the EIR.

Please see the responses to Letter 98.

**Response 116B:** See Response 116A.

**Response 116C:** See Response 116A.

**Response 116D:** See Response 116A.

**Response 116E:** See Response 116A.

**Response 116F:** See Response 116A.

**Response 116G:** See Response 116A.

Lisa Lozier, AICP, Senior Planner, Shasta County  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001  
Phone: (530) 225-5532

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JAN 31 2011

COUNTY OF SHASTA  
PERMIT COUNTER

Re: Comments on Partially Re-circulated Draft Environmental Impact Report for Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

This letter comments on the Partially Re-circulated Draft Environmental Impact Report dated December 2010 (RDEIR), for the Knighton & Churn Creek Commons Retail Center (Project).

The RDEIR acknowledges that the Project will result in substantial increases in traffic at the Knighton Road/I-5 interchange, as well as on existing surface streets and regional circulation facilities. The following paragraphs further identify problems and inconsistencies in the RDEIR:

**General Plan**

The proposed project is inconsistent with the General Plan policy on "access control." The segment of Knighton Road between the Northbound 1-5 Off-ramp and Churn Creek Road is 710 feet and Knighton Road will serve as an arterial roadway by nature of the interchange at 1-5. Proper access control would prohibit full access driveways on this segment of Knight Road. Further, by deferring the improvements identified as mitigation measures is inconsistent with General Plan policy 6-CI, as described on Page 3.12-11 of the RDEIR.

A

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**Truck Stop**

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Identifying improvements to the truck stop requires improvements to be constructed on private property that may not be controlled by the owner of the proposed project. As such, there is no way to know if permission will be granted by the owner of the truck stop to allow the identified improvements.

D

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E

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The RDEIR indicates the proposed project will create significant impacts at the Northbound and Southbound 1-5 off-ramp intersections at Knighton Road. Deferring signalization of these intersections will result in significant congestion at those locations. This congestion could, in turn, result in vehicle queuing on the I-5 off-ramp that extends to the freeway mainline. Vehicle queuing that extends to the freeway mainline creates a severe traffic hazard.

F

**Conclusion**

This project will increase traffic counts, reduce the Level of Service at some locations to unacceptable. Full funding for the required improvements is not currently available – thus going forward with this project without securing the funds necessary to mitigate these issues exacerbates the LOS and safety conditions. A decision to approve such a project runs against common sense, precedent and the county's General Plan.

G

Sincerely,

*Buck Lang*  
*Sue Lang*

Sue and Buck Lang

569 Rivella Vista Drive

Redding, CA 96001

530 241 9068

**Letter 117: Buck & Sue Lang**

**Response 117A:** The comments are noted and incorporated in the EIR.

Please see the responses to Letter 98.

**Response 117B:** See Response 117A.

**Response 117C:** See Response 117A.

**Response 117D:** See Response 117A.

**Response 117E:** See Response 117A.

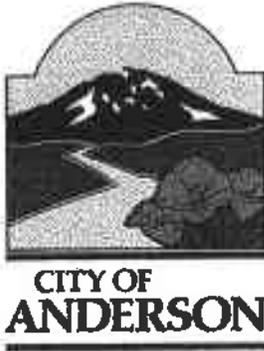
**Response 117F:** See Response 117A.

**Response 117G:** See Response 117A.

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JAN 31 2011

COUNTY OF SHASTA  
PERMIT COUNTER



January 31, 2011

Ms. Lisa Lozler, Senior Planner  
 Shasta County Department of Resource Management  
 1855 Placer Street, Suite 103  
 Redding, CA 96001

Subject: Reclruclated Draft EIR for Knighton and Churn Creek Commons Center

Dear Ms. Lozier:

Thank you for this opportunity to comment on the partially recirculated Draft EIR for the *Knighton & Churn Creek Commons Retail Center*. The City appreciates this opportunity to review the revised traffic analysis and in particular the mitigation strategy. We agree that finding a mitigation strategy that works on a regional basis can be difficult, in no small part due to the number of agencies and jurisdictions that must agree to the strategy before it can be implemented. Fortunately, the County has been a participant in several different fee programs designed specifically to pay for improvements needed to support new growth. The County has participated in these programs even though many of the improvements may be within the jurisdiction of another agency.

A

Unfortunately, fees alone are insufficient to fully mitigate impacts. The first issue is that payment of fees in no way guarantees that the improvement will in fact be constructed. The second is that fees rarely keep pace with the increase in construction costs. This leaves a gap between fees collected and the actual cost of the improvement; a gap filled by the agency that has to construct the improvement.

B

Given the high percentage of responsibility identified in the previous Draft EIR traffic section, most agencies would require the developer to install the improvements rather than pay the fees. We would also recommend that at least for the interchange, the proposed project actually build the improvements rather than pay the fees. Particularly since, as shown on Table 3.12-13, the level of service will drop from an existing LOS of B to an LOS of F under the *Existing Plus Project Condition*. Knowing that fees seldom cover the cost of an improvement, and the fact that a poorly functioning interchange would jeopardize both the proposed project and the existing development on Knighton Road, we find it odd that the County took the fee approach. The percentages quoted in the previous EIR section were well over 75 percent. (Table 3.12-17a shown as deleted in this recirculated traffic section.)

C

Given the jurisdictions involved, the mitigation should be clearly stated. For example, would the pro-rata fees for improvements in the City of Anderson (Riverside Interchange) be sent to the City to later apply to the appropriate improvement? Or would the County keep the fee in escrow for later usage and if so, how would the City know when the fee was paid and how much was provided? For improvements for

D

which no engineering costs have been developed, how would the pro-rata share be determined? Certainly a fair argument can be made to keep the exact dollar amounts out of the EIR, however the mitigation strategy, particularly one that relies on the acceptance and participation of other agencies, should be better defined in the EIR. Simply because an impact is outside the jurisdiction of the lead agency does not absolve that agency of having to mitigate the impact.

D cont.

Sincerely,

A handwritten signature in cursive script that reads "Dana Shigley". The signature is written in black ink and is positioned above the printed name and title.

Dana Shigley  
City Manager

**Letter 118 Dana Shigley, City Manager, City of Anderson**

**Response 118A:** The comment is noted and incorporated in the EIR. The County's past cooperation with the City of Anderson has been of mutual benefit.

**Response 118B:** The comment is noted and incorporated in the EIR. The PRDEIR's analysis of mitigated traffic impacts is based upon timely implementation of proposed physical mitigation measures; it does not propose mitigation deferral.

**Response 118C:** The comment is noted and incorporated in the EIR. Please see Response 118B.

**Response 118D:** The comment is noted and incorporated in the EIR. Please refer to Comment Letter 104, Response 104K with respect to "fair share" calculation and to Comment Letter 85, Response 85.1G regarding the lack of County authority to mitigate impacts or require impact mitigation in other jurisdictions.

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JAN 31 2011

COUNTY OF SHASTA  
PERMIT COUNTER

January 31, 2011

Lisa Lozier, AICP, Senior Planner, Shasta County  
Department of Resource Management, Planning Division  
1855 Placer Street, Suite 103  
Redding, California 96001  
Phone: (530) 225-5532

Re: Comments on Partially Re-circulated Draft Environmental Impact Report for Knighton & Churn Creek Commons Retail Center

Dear Ms. Lozier:

This letter comments on the Partially Re-circulated Draft Environmental Impact Report dated December 2010 (RDEIR), for the Knighton & Churn Creek Commons Retail Center (Project).

The RDEIR acknowledges that the Project will result in substantial increases in traffic at the Knighton Road/I-5 interchange, as well as on existing surface streets and regional circulation facilities. The following paragraphs further identify problems and inconsistencies in the RDEIR:

1. The proposed project is inconsistent with the General Plan policy on "access control." Further, by deferring the improvements identified as mitigation measures is inconsistent with General Plan policy 6-CI, as described on Page 3.12-11 of the RDEIR.

2. The RDEIR indicates "existing" traffic data taken from several sources - including some as old as 6 years. Traffic volumes as old as 2004 are not likely to accurately reflect current traffic conditions and should be updated.

3. Interstate 5 - the main route to potential new stores - as well as the freeway onramps would hit "Level of Service F." This is not acceptable.

4. The proposed project indicates a reconfiguration of the access points along Knighton Road to accommodate site circulation for the proposed project and the TA truck stop to improve safety along Knighton Road. As such, the proposed improvements at the truck stop must be included in the project description of the DEIR and all impact analyses included in the DEIR and RDEIR must evaluate the truck stop improvements.

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5. The RDEIR does not adequately analyze the Project's potential impacts to schools. It does not assess impacts to schools resulting from increased traffic due to the Project, and fails to provide for appropriate mitigation measures.

E

6. The RDEIR does not indicate when improvements funded by the fee programs will be implemented. Given the current economic climate for new development, and depending on the current financial status of those fee programs, mitigation measures for the proposed project may not be implemented for years after occupancy is allowed at the proposed project. This will result in the project causing severely congested conditions and safety hazards at numerous locations in the project study area.

F

This project will increase traffic counts, reduce the Level of Service at some locations to unacceptable. Full funding for the required improvements is not currently available – thus going forward with this project without securing the funds necessary to mitigate these issues exacerbates the LOS and safety conditions.

G

Sincerely,

Melita Bena  
24277 Shirley Drive  
Bella Vista, CA 96008  
530-472-1092

**Letter 119 Melita Bena**

**Response 119A:** The comments are noted and incorporated in the EIR.

Please see responses to Comment Letter 98.

**Response 119B:** See Response 119A.

**Response 119C:** See Response 119A.

**Response 119D:** See Response 119A.

**Response 119E:** See Response 119A.

**Response 119F:** See Response 119A.

**Response 119G:** See Response 119A.