

Anderson-Cottonwood Irrigation District
2810 Silver Street - Anderson, California 96007
530-365-7329 Fax: 530-365-7623
e-mail: acidwater@sbcglobal.net

February 20, 2008

Mr. Kent Hector, Senior Planner
Planning Division
Shasta County Department of Resource Management
1855 Placer Street, Suite 103
Redding, California 96001

DEPARTMENT OF
RESOURCE MANAGEMENT
RECEIVED

FEB 21 2008

PLANNING/BUILDING
DIVISIONS

Re: General Plan Amendment 07-001, Zone Amendment 07-004, and Tract Map 1960 – Romar Homes, Inc.

Dear Mr. Hector:

This is in response to the *Notice of Public Scoping Meeting for an Environmental Impact Report* received by my office regarding the above-named project, and the opportunity, as an affected agency, to provide comments regarding this project.

Following review of the Initial Study Checklist and Project Data for General Plan Amendment 07-001, Zone Amendment 07-004, and Tract Map 1960, I provided comments on behalf of Anderson-Cottonwood Irrigation District to your office, addressed to Mr. Paul Bolton, in February 2007. Many of the following comments were included in that earlier letter, and this letter also includes comments not provided earlier.

The proposed project would result in the construction of up to 430 single-family homes and associated infrastructure including streets, sidewalks, and driveways. Analysis of the detention or discharge of urban water runoff that will result from this project by household use or stormwater runoff was not included in the Initial Study Checklist, and detention ponds were mentioned but not detailed in the Project Description.

The Quality of Water Discharged Will Change.

As noted in Section II.6 of the Initial Study Checklist, seasonal rainfall currently results in natural flows that terminate in the Anderson-Cottonwood Irrigation District (ACID) main canal. Following development, the volume and the quality of these discharges will change. ACID is a special district formed under Division 11 of the California Water Code for the purpose of delivering water to agricultural irrigators. The quality of such water is of utmost importance to the District and its ratepayers, and is regulated by the California Central Valley Regional Water Quality Control Board (Regional Board).

Regulatory Hurdles.

Unfiltered or untreated water discharged from developments such as proposed here would more likely than not contain petroleum products, fertilizers, herbicides, pesticides, and household cleaning products. The introduction of urban runoff into District facilities will not be allowed without the express approval of the Board of Directors and the issuance of a drainage permit, following the development of a discharge plan by the applicant that would include but may not be limited to the following components:

- Filtering and/or monitoring to ensure the absence of contaminants.
- Limiting discharge volumes to flows that will not damage the canal.
- Constructing and maintaining discharge headworks that meet District construction standards.
- Compliance with the District's drainage fee schedule.

Following the development of such a plan, the District's Board of Directors would consider a proposal by the applicants for the provision of drainage service, but such decisions are made on a case-by-case basis following the determination that no harm will result to District ratepayers.

Moreover, any approval by the District will also be subject to further water quality conditions imposed by the Regional Board pursuant to the Porter-Cologne Water Quality Control Act. For example, District landowners are currently subject to a Conditional Agricultural Waiver program developed by the Regional Board pursuant to Porter-Cologne. This program prohibits the discharge of agricultural return flow (runoff) unless the landowners agree to monitor for selected constituents of interest, collect data and report to the Regional Board on the discharge of water containing any of the listed constituents. Candidly, we do not know where this regulatory program is going to go; the Regional Board may remain satisfied with monitoring, data collection and reporting under an agricultural waiver program, or may impose Waste Discharge Requirements (further permit conditions.) Under the current program, the Regional Board has authority to impose a cease and desist order prohibiting the discharge of water that contains constituents of greater than an established water quality standard.

We do, however, know that the District cannot permit discharge of water into its canal without knowing whether and to what extent the discharge contains constituents that would prevent the District from delivering water for agriculture or discharging into another water body.

It is the responsibility of Shasta County to ensure that developed lands are served by an adequate, legal, and workable drainage system to remove or detain household and stormwater runoff, and that is consistent with the requirements of law. Anderson-Cottonwood Irrigation District, absent prior agreement, cannot provide this service.

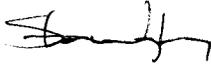
Easement Rights

Because a significant portion of this project is bordered by the existing ACID Main Canal and the associated Canal easement, it is imperative that the proposed project not encroach upon or impede District access to the easement.

Grading

It is also important that grading not be allowed or undertaken near or upon the existing canal bank; such activity has the potential to compromise the integrity of the soils and the embankment which could cause seepage from the canal during periods of operation.

Sincerely,



Stan Wangberg
General Manager

C: Mr. Shawn Kreps
Director, Division IV

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FEB 05 2007

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Anderson-Cottonwood Irrigation District
2810 Silver Street - Anderson, California 96007
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e-mail: acidwater@sbcglobal.net

February 2, 2007

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

Dear Mr. Bolton,

Having reviewed the Initial Study Checklist and Project Data for Tract Map 1960, Zone Change 07-004, and General Plan Amendment 07-001, I would like to provide the following comments on behalf of Anderson-Cottonwood Irrigation District.

The proposed project would result in the construction of 446 single-family homes and associated infrastructure including streets, sidewalks, and driveways. Analysis of the detention or discharge of urban water runoff that will result from this project by household use or stormwater runoff is not included in the Initial Study Checklist, and detention ponds are mentioned but not detailed in the Project Description.

The Quality of Water Discharged Will Change.

As noted in Section II.6 of the Initial Study Checklist, seasonal rainfall currently results in natural flows that terminate in the Anderson-Cottonwood Irrigation District (ACID) main canal. Following development, the volume and the quality of these discharges will change. ACID is a special district formed under Division 11 of the California Water Code for the purpose of delivering water to agricultural irrigators. The quality of such water is of utmost importance to the District and its ratepayers, and is regulated by the California Central Valley Regional Water Quality Control Board (Regional Board).

Regulatory Hurdles.

Unfiltered or untreated water discharged from developments such as proposed here would more likely than not contain petroleum products, fertilizers, herbicides, pesticides, and household cleaning products. The introduction of urban runoff into District facilities will not be allowed without the express approval of the Board of Directors and the issuance of a drainage permit, following the development of a discharge plan by the applicant that would include but may not be limited to the following components:

- Filtering and/or monitoring to ensure the absence of contaminants.
- Limiting discharge volumes to flows that will not damage the canal.
- Constructing and maintaining discharge headworks that meet District construction standards.

- Compliance with the District's drainage fee schedule.

Following the development of such a plan, the District's Board of Directors would consider a proposal by the applicants for the provision of drainage service, but such decisions are made on a case-by-case basis following the determination that no harm will result to District ratepayers.

Moreover, any approval by the District will also be subject to further water quality conditions imposed by the Regional Board pursuant to the Porter-Cologne Water Quality Control Act. For example, District landowners are currently subject to a Conditional Agricultural Waiver program developed by the Regional Board pursuant to Porter-Cologne. This program prohibits the discharge of agricultural return flow (runoff) unless the landowners agree to monitor for selected constituents of interest, collect data and report to the Regional Board on the discharge of water containing any of the listed constituents. Candidly, we do not know where this regulatory program is going to go; the Regional Board may remain satisfied with monitoring, data collection and reporting under an agricultural waiver program, or may impose Waste Discharge Requirements (further permit conditions.) Under the current program, the Regional Board has authority to impose a cease and desist order prohibiting the discharge of water that contains constituents of greater than an established water quality standard.

We do, however, know that the District cannot permit discharge of water into its canal without knowing whether and to what extent the discharge contains constituents that would prevent the District from delivering water for agriculture or discharging into another water body.

It is the responsibility of Shasta County to ensure that developed lands are served by an adequate, legal, and workable drainage system to remove or detain household and stormwater runoff, and that is consistent with the requirements of law. Anderson-Cottonwood Irrigation District, absent prior agreement, cannot provide this service.

Environmental Compliance

The Project Description states that *"It is expected that the environmental analysis of this project will determine that an Environmental Impact Report should be performed."* Pursuant to the California Environmental Quality Act (CEQA), it is the obligation of Shasta County to perform, or require to be performed, the necessary analysis of such issues as drainage and stormwater runoff for the proposed project. In accordance with the requirements of CEQA, these analyses must be completed prior to an amendment of the County's General Plan enacted to allow implementation of the project.

Sincerely,



Stan Wangberg
General Manager

DEPARTMENT OF TRANSPORTATION
OFFICE OF COMMUNITY PLANNING
1657 RIVERSIDE DRIVE
P. O. BOX 496073
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FAX (530) 225-3578
TTY (530) 225-2019

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IGR/CEQA Review
Sha-5-2.0
Romar/Panorama Subdivision
TR 1960
Request for Comments

February 16, 2007

Mr. Paul Bolton
Shasta County Department of Resource Management
Planning Division
1855 Placer Street
Redding, CA 96001

Dear Mr. Bolton:

The California Department of Transportation (Caltrans) has reviewed the General Plan amendment, zone amendment, and subdivision map submitted on behalf of Romar Inc. for a 446-unit subdivision. The project is located northeast of the Gas Point Road/Interstate 5 (I-5) interchange and southeast of the Deschutes Road/I-5 interchange.

The project is in proximity to the Shasta County Southern Region Transportation Planning Traffic Impact Fee Program Area but it is unclear whether the proposed project residential density was considered in the study. The project information states that Omni-Means has prepared a Preliminary Study for Trip Generation, Distribution, and Balls Ferry Road Re-alignment. Caltrans requests a copy of this report.

As part of the scoping process for this project, Caltrans desires to maintain a close relationship with the County, applicants, and their representatives in the preparation of the traffic study and environmental document relating to traffic concerns. Caltrans requests the opportunity to meet with County staff and representatives for the project to discuss the assumptions and methodologies proposed for the traffic study prior to initiating work on a traffic study.

It appears that the current traffic impact fee programs are inadequate to address circulation improvements to the State highway system for freeway mainline improvements. This project, as well as other projects proposed for this area, will add potentially significant cumulative traffic impacts to the state and local transportation system.

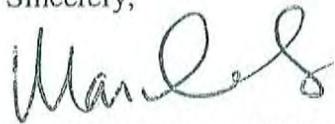
Sha-5-2.0
Romar/Panorama Subdivision
TR 1960
Request for Comments
February 16, 2007
Page 2

The government entities along the I-5 corridor in Shasta and Tehama counties have agreed to participate in the Fix Five Partnership study. The Fix Five study will determine the impacts to the I-5 corridor as a result of development, identify mitigation measures, and set up a funding mechanism to pay for the identified mitigation projects. We anticipate that the study will result in a fair and legal method to assess development projects for direct and cumulative impacts to the I-5 corridor. It will also be a savings to the developers in that a detailed traffic study most likely will not need to be conducted for each individual development proposal.

The Fix Five partnership effort will begin soon. Prior to release and adoption of the final plan, we request that the County collect interim fees from this development to pay towards their share of cumulative mitigation to I-5.

Thank you for the opportunity to provide comments on the proposed project. We look forward to reviewing the information requested and the opportunity to meet and discuss the traffic study for this project. If you have any questions, or if the scope of this project changes, please call me at 225-3369.

Sincerely,



MARCELINO GONZALEZ
Local Development Review
Office of Community Planning

DEPARTMENT OF TRANSPORTATION
OFFICE OF COMMUNITY PLANNING
1657 RIVERSIDE DRIVE
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MAR 21 2008

PLANNING/BUILDING
DIVISIONS

IGR/CEQA Review
Sha-5-2.0
Romar/Panorama Homes Subdivision
TR 1960
NOP DEIR
SCH # 2008022104

March 19, 2008

Mr. Kent Hector
Shasta County Department of Resource Management
Planning Division
1855 Placer Street
Redding, CA 96001

Dear Mr. Hector:

Thank you for the opportunity to provide comments on the Notice of Preparation of a Draft Environmental Impact Report (NOP EIR) for the General Plan amendment, zone amendment, and subdivision map submitted on behalf of Romar Inc. for a 446-unit subdivision. The project is located northeast of the Gas Point Road/Interstate 5 (I-5) interchange and southeast of the Deschutes Road/I-5 interchange.

The project is in proximity to the Shasta County Southern Region Transportation Planning Traffic Impact Fee Program Area, but it is not accounted for in that study. As part of the scoping process, Caltrans appreciates the opportunity we had to meet and discuss the scope of the traffic study on February 1, 2008. We look forward to maintaining a close relationship with the County, applicants, and their representatives in the preparation of the traffic study and environmental document relating to traffic concerns.

The current traffic impact fee programs are inadequate to address circulation improvements to the State highway system for freeway mainline improvements. This project, as well as other projects proposed for this area, will add potentially significant cumulative traffic impacts to the state and local transportation systems. The government entities along the I-5 corridor in Shasta and Tehama counties have agreed to participate in the Fix Five Partnership study. We anticipate that the study will result in a fair and legal method to assess development projects for direct and cumulative impacts to the I-5 corridor. However, in the absence of adoption of the Fix 5 Mitigation Program, the DEIR should identify the project's proportionate share toward mainline freeway impacts, as well as, interchanges, intersections, and other State highways.

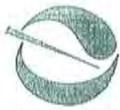
Sha-5-2.0
Romar/Panorama Subdivision
TR 1960
NOP DEIR
SCH # 2008022104
March 19, 2008
Page 2

We look forward to reviewing the traffic study for this project. If you have any questions, or if the scope of this project changes, please call me at 225-3369.

Sincerely,

A handwritten signature in black ink, appearing to read "Marcelino Gonzalez". The signature is fluid and cursive, with a large initial "M" and a long, sweeping tail.

MARCELINO GONZALEZ
Local Development Review
Office of Community Planning



California Regional Water Quality Control Board Central Valley Region



Linda S. Adams
Secretary for
Environmental Protection

Redding Office
415 Knollcrest Drive, Suite 100, Redding, California 96002
(530) 224-4845 • Fax (530) 224-4857
<http://www.waterboards.ca.gov/centralvalley>

DEPARTMENT OF
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Arnold
Schwarzenegger
Governor

FEB 27 2007

PLANNING/BUILDING
DIVISIONS

26 February 2007

Paul Bolton
Senior Planner
Shasta County Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001

COMMENTS ON THE PROPOSED MARK RYCHLIK (ROMAR, INC.) – TRACT MAP 1960, ZONE CHANGE 07- 004 AND GENERAL PLAN AMENDMENT 07- 001 SUBDIVISION PROJECT, COTTONWOOD, SHASTA COUNTY

On 25 January 2007, our office received a copy of the Permit Planning Master Application (Referral) from your office regarding the proposed project referenced above. The California Regional Water Quality Control Board, Central Valley Region (Regional Water Board) is a responsible agency for this project, as defined by the California Environmental Quality Act (CEQA).

The proposed project includes seven parcels located at 21588 Yellow Rose Lane, 3906 Balls Ferry Road, and 21111 and 21129 Arena Drive, in the northeast portion of the Cottonwood Community, adjacent to the east side of Locust Road and north of Balls Ferry Road (APNs 090-380-028; 090-440-0028; 090-450-004; 090-460-009, -010, 029, -037). The proposed project consists of subdividing 307-acres into 446 single-family residences. The proposed project would consist of detached single-family homes (362 units) ranging from lot sizes of 5,000 square feet to 1.25 acres; garden court lots (84 units) ranging in size from 2,790 to 3,100 square feet; and a 131.5-acre Open Space/Pedestrian Trail Common Area. The property contains unnamed ephemeral and/or intermittent streams, tributary to Cottonwood Creek, and the ACID Canal.

The proposed project would require a Shasta County General Plan Amendment from Rural Residential "A" (RA) and Rural Residential "B" (RB) to Suburban Residential (SR) and a zone change from Rural Residential (RR) and One Family Residential, combined with a Mobile Home (R-1T) district to Planned Development district, in order to allow the proposed densities, lot sizes and set back variations from existing zoning standards and to establish site and architectural design features. The overall net density of the project would be approximately 1.6 units per acre.

The project site is within the boundaries of the Cottonwood Water District and has received a will service letter. The project would require off-site construction of a sewer forced main from the project to Cottonwood Sewer District facilities, construction of water lines for connection to

the Cottonwood Water District, and looping of water facilities for fire suppression pressure purposes.

The following comments are provided to help outline the potential permitting required by the Regional Water Board's agency, policy issues concerning the project, and suggestions for mitigation measures. Our present comments focus primarily on the proposed housing densities, resulting water quality impacts, and potential discharges regulated under our Clean Water Act (CWA) §401 and storm water programs.

The proposed project would result in a high-density residential development, in a currently rural setting. The proposed high density residential development will likely cause habitat destruction, water quality impacts, increases in pollutants of concern (i.e. petroleum hydrocarbons, fertilizers, metals, pesticides, ect.), direct and indirect impacts to waters of the U.S. and/or State, as well as additional impacts. A lower density development, consistent with the current General Plan for Shasta County (GP), would have significantly less potential impacts to the environment. Therefore, Regional Water Board staff recommend that Shasta County deny the request for a General Plan Amendment associated with the proposed project, and require the current zoning and density standards for the subject parcels, as outlined in the GP.

Regional Water Board authority related to the proposed project appears to include:

- Fill or dredged material discharges CWA §401 water quality certification for federal waters; or Waste Discharge Requirements for non-federal waters
- Storm water and other wastewater discharges CWA §402 NPDES permit
- Other Waste Discharge Requirements or other permits for discharges that may affect ground water such as from proposed solid waste transfer facilities.

The following summarizes project permits that may be required by our agency depending upon potential impacts to water quality:

Water Quality Certification (401 Certification) – Permit issued for activities resulting in dredge or fill within waters of the United States (including wetlands and streams). Destruction of, or impacts to these waters should be avoided. Under the CWA § 401 and 404, disturbing these waters requires a CWA §404 permit from the U.S. Army Corps of Engineers (ACOE) and a CWA §401 certification from the Regional Water Board. The presence of any jurisdictional waters, including wetlands, and other waters of the state should be delineated, if applicable, to determine the applicable permits required for the development to proceed. If impacts to those waters are planned to occur, CWA § 401 and 404 permits will be required. The CWA §404 and 401 certifications are required for activities involving a discharge (such as fill or dredged material) to waters of the United States. "Waters" typically include, but are not limited to, wetlands, riparian zones, streambeds, rivers, lakes, and oceans. Typical activities include any

modifications to these waters, such as stream crossings, stream bank modifications, filling of wetlands, etc.

Mitigation of the proposed impacts must meet the wetland no-net-loss policy (Executive Order W-59-93), so mitigation measures need to be compensatory in nature. In-lieu fees may be allowed to offset temporal loss issues, however they will not meet the no-net-loss policy requirements. If jurisdictional waters are found on the site, the project applicant will be required to provide compensatory mitigation for all impacted habitat.

Waste Discharge Requirements (WDRs) or a Conditional Waiver of WDRs – Under authority of the California Water Code, the Regional Water Board may issue WDRs for any project, which discharges or threatens to discharge waste to waters of the state. Projects that cause disturbance to waters of the State (including any grading activities within stream courses) require permitting by the Regional Water Board.

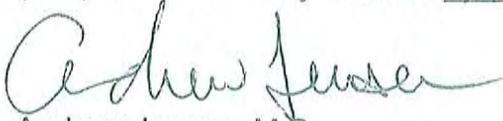
General Permit for Storm Water Discharges Associated with Construction Activity (General Permit) – Land disturbances of 1 acre or more requires the landowner to obtain coverage under the General Permit. If the site disturbance is over 1-acre, the owner would need to file a Notice of Intent (NOI), along with a vicinity map, a Storm Water Pollution Prevention Plan (SWPPP), and appropriate fees to the State Water Resources Control Board (SWRCB), prior to the commencement of any activities on site. The owner may call our office to receive a permit package or download it off the Internet at:
<http://www.waterboards.ca.gov/stormwtr/index.html>.

Post Construction Requirements

The General Permit and the Small Municipal Separate Storm Sewer Systems Permit (MS4 General Permit), requires the preparation and submittal of specific information regarding post-construction Best Management Practices (BMPs) that will be incorporated in the project to mitigate pollutants. Post-construction storm water management in areas undergoing new development or redevelopment is necessary because runoff from these areas has been shown to significantly affect receiving waterbodies. As stated in the Environmental Protection Agency MS4 Phase II Final Rule, many studies indicate that prior planning and design for minimization of pollutants in post-construction storm water discharges is the most cost-effective approach to storm water quality management.

Therefore, if the project proceeds with densities of 1.6 units per acre, or similar densities, the project development plans and environmental review documents prepared pursuant to the CEQA should indicate that the proposed project applicant shall prepare an NOI, a SWPPP and post construction storm water development plans, as discussed above, and submit copies to the Regional Water Board for review, to mitigate pollutants from the new development proposed on the site. The development plans should contain specific structural and non-structural post-construction BMPs, such as grassed swales, bioretention, porous pavement, treatment vaults, retention of buffer strips, minimization of impervious surfaces, etc, and approximate locations of each BMP. For more information go to:
http://www.waterboards.ca.gov/stormwtr/post_construction.html.

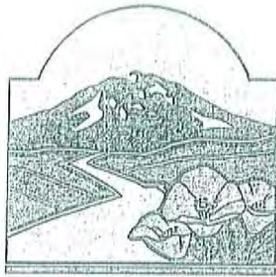
If you have any questions or comments regarding this matter please contact me at (530) 224-4783 or by email at Ajensen@waterboards.ca.gov.



Andrew Jensen, M.S.
Environmental Scientist
Storm Water and Water Quality Certification Unit

AJJ: reb

cc: Mr. Matt Kelley, U.S. Army Corps of Engineers, Regulatory Unit, Redding
Ms. Donna Cobb, California Department of Fish and Game, Redding



CITY OF
ANDERSON

DEPARTMENT OF
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PLANNING/BUILDING
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February 1, 2007

Shasta County Department of Resource Management
Attn Paul Bolton
1855 Placer Street, Suite 103
Redding, Ca 96001

Subject: GPA 07-001 and Z 07-004

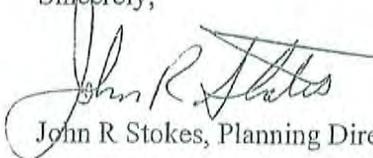
Dear Paul,

I received the referral for a residential subdivision project that requires a general plan amendment and zone change. This project is located approximately ¼ mile south of the City of Anderson's Sphere of Influence boundary. However, the project is of interest to the City of Anderson because it is located on Locust Road. Locust is designated as an arterial in the General Plan and is the major north / south road connection located directly east of Interstate 5. Locust also provides the closest connection north of the site to Interstate 5. Increasing the residential density will have an impact on the Deschutes Road interchange. There are recognized capacity constraints at this interchange even after completion of the City's project. The City of Anderson is currently in the process of completing an improvement project for this interchange. A zone of benefit has been adopted to fund these improvements. The traffic analysis for this project needs to include the impact of the Deschutes interchange as well as the roads within the city. Based on this analysis, it may be appropriate for this project to mitigate impacts by paying the zone of benefit fees.

An EIR is currently underway for the Vineyards at Anderson, which is located west of this project across Interstate 5. One of the traffic circulation alternatives that is being explored is a new connection to Interstate 5 somewhere approximately 3/8 to ½ mile north of this project. If this facility is ultimately constructed it would then be the closest connection to the freeway. This facility may be necessary for this project due to the capacity limitation at the Deschutes Interchange.

The City of Anderson will want to participate in scoping and review the environmental documents for this project. If you have any questions please contact me at (530) 378-6643.

Sincerely,


John R Stokes, Planning Director



**CITY OF
ANDERSON**

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FEB 26 2008

PLANNING/BUILDING
DIVISIONS

February 22, 2008

Kent Hector
Shasta County Department of Resource Management,
1855 Placer Street
Redding, CA 96001

RE: Panorama Planned Development

Dear Mr. Hector,

The City of Anderson has received and reviewed the Notice of Preparation for the Panorama Planned Development EIR. This development will generate traffic, apportion of which will use the Deschutes Road at Interstate 5 Interchange and therefore, should participate in the funding mechanism for the Deschutes Road at Interstate 5 Interchange improvements. The Traffic Impact Fee is based on the City of Anderson Ordinance No. 737. This ordinance amended the development impact fee established by Ordinance No. 732 and established a fee of \$1,367 per equivalent dwelling unit (EDU). The ordinance also provides for an automatic yearly adjustment of this fee. Commencing on August 1st of each year after August 1st, 2006 the fee is adjusted by a percentage equal to the percentage of change as published in the Annual Engineering New Record, Construction Cost Index. The present Traffic Impact fee is \$1,475.99 per EDU.

These fees should be paid at the time of the issuance of building permits, and remitted to the City of Anderson. Payment of this one time fee will satisfy Panorama Planned Development's obligation for traffic impacts within the City of Anderson, at the Deschutes Road at Interstate 5 Interchange.

If you should have questions please contact Richard Barchus, at (530) 378-6640.

Respectfully yours,

Richard Barchus
Public Works Director

Board of Directors:
Chairman,
Arthur W. Parham Jr.
Board Members;
Carolyn Barlow
Mel "Sonny" Bramley
Larry Brower
Louis "Lou" Finck
Fire Chief
Jim Flaherty
Secretary
Rodney Chadbon

Cottonwood Fire Protection District

P.O. Box 618
 3271 Brush Street, Cottonwood, CA 96022
 Business (530) 347-4737 Fax (530) 347-4771

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OCT 02 2009

PLANNING/BUILDING
 DIVISIONS

October 1, 2009

Shasta County Department of Resource Management
 Planning Division
 1855 Placer Street, Suite 103
 Redding,
 CA. 96001
 Attn: Kent Hector

The Cottonwood Fire Protection District serves the subject development as initial response for fire and emergency services. The property is approximately 1 1/2 miles from the fire station.

In 2007, CFPD personnel responded to 713 calls, including 442 medically related calls, 56 structure fires, 78 traffic incidents and 137 miscellaneous/other calls. The response times to the access points planned in this development would be approximately 3-4 minutes. A new development the size of Panorama Planned Development would not put an undue burden on the CFPD if the following provisions, which have been discussed and agreed with the developer Mr. Mark Rychlik, are put in place.

The provisions are:

- Access to the many trails and green belt areas for fire suppression/prevention and emergency medical services.
- To work with Cottonwood Water District to ensure adequate water supply and hydrants for fire protection, meeting volume and fire flow standards. Fire hydrants in this project will be required to meet Shasta County Fire Safety Standards as well as NFPA standards for placement, type, color and flows.
- A through road system will be required, provided for on the initial plans.
- A Community Facilities District, with CFPD as the lead agency, is a requirement on this development. There will be a need for additional Fire Department personnel to meet the standards for the increase in population and substantial cost to the district in meeting the needs for developing community safety.

If any of the above provisions are not met then the development will present an unacceptable safety situation in an area rated as a High Fire Hazard Severity Zone, to the Cottonwood Fire Protection District.

Sincerely,



Jim Flaherty Fire Chief Cottonwood Fire Protection District.

AGENCY~1.TXT

-----Original Message-----

From: Kent Hector [mailto:khector@co.shasta.ca.us]

Sent: Friday, October 02, 2009 10:09 AM

To: Don Burk

Subject: Panorama Planned Development- Additional comment from CFD

-----Original Message-----

From: Cottonwood Fire Dept. [mailto:cfpd23@sbcglobal.net]

Sent: Friday, October 02, 2009 10:07 AM

To: Kent Hector

Subject: Panorama Planned Development

Kent,

This is to confirm that per the first bullet under the required provisions on our October 1st, 2009 letter, access to trails and green belt areas as laid down on the initial plans are acceptable to Cottonwood Fire Protection District.

Rod Chadbon

for BC Calvin Ciapponi & Chief Jim Flaherty

COTTONWOOD WATER DISTRICT

P.O. BOX 2130 • 3282 CHESTNUT ST.
COTTONWOOD, CALIFORNIA 96022
(530) 347-3472
FAX (530) 347-0189

Shasta County Planning Department
2007
1855 Placer Street, Suite 103
Redding, CA 96001-1759

January 24,

RE: Will Serve Letter
Romar Homes
Panorama Planned Development

At the present time the Cottonwood Water District does not have the water capacity to serve the proposed 400 units Panorama planned development. An analysis was performed by Pace Civil, Inc. to determine the infrastructure improvements needed in order to adequately serve the project with domestic water and fire suppression.

The proposed improvements were added to the future Cottonwood Water District hydraulic model to determine the impact on water production and distribution. The model indicates that a new well, storage tank, booster pump station, and emergency backup generator will be required to supply the proposed development.

The Cottonwood Water District does not currently have the funding to finance this project. Preliminary discussions between the Cottonwood Water District and the developer regarding funding of the improvements suggest that Romar Homes will front the project costs and be reimbursed by the District for oversizing the tank and well facilities through future connection fees.

Upon meeting the required improvement described, the Cottonwood Water District will serve this project with District water. The water supplied by the Cottonwood Water District is in full compliance with the State and Federal standards.

At the present time, the Capacity fee for one household equivalent (HE) is \$6,900.00.

Please be advised that this "Will Serve" letter is valid for the period of (1) one year of the date of issuance.

Sincerely,



Kris Hollmer
General Manager, Cottonwood Water District

KH/dc



Department of Energy
Western Area Power Administration
Sierra Nevada Customer Service Region
114 Parkshore Drive
Folsom, California 95630-4710

MAR 10 2008

**DEPARTMENT OF
RESOURCE MANAGEMENT
RECEIVED**

MAR 11 2008

Mr. Kent Hector
Senior Planner
Shasta County Planning Department
1855 Placer Street, Suite 105
Redding, CA 96001

**PLANNING/BUILDING
DIVISIONS**

Dear Mr. Hector:

The United States Department of Energy, Western Area Power Administration (Western) has reviewed the drawings for the Panorama Planned Development, Phase 3, 4, 5, 6, and 7, which are partially located on Western's Round Mountain-Cottonwood 230-kilovolt (kV) transmission line (line), Airport-Cottonwood 230-kV line, Shasta-Cottonwood No. 1. and No. 2, 230-kV lines and the Cottonwood-Olinda No. 1 and No. 2, 230-kV line easements. Western lines are affected by the proposed development and restrictions shall be placed to prevent unauthorized use of the easements.

Western has no objection to the recordation of the Final Map provided the following restrictions are met:

1. The line easements are crosshatched and marked "RESTRICTED BUILDING and VEGETATION AREA."
2. The Final Map contains a note to contact Western prior to planning any development or improvements within the easement areas. Contact Western's Realty Office at (916) 353-4416.
3. The enclosed deed restrictions are recorded along with the Final Map, for any lots affected by the easements.

Enclosed is a copy of our General Guidelines for the easement area, an aerial map, and marked up Planned Development Map with the lines designated on it. Please note that excavation is not permitted within 20 feet of any tower footings and conductor to ground clearance must be maintained at a minimum of 30 feet. Any ground elevation changes or improvements, i.e. fences, must be reviewed by Western to assure that they will not hinder maintenance or ready access to and along the line right-of-way. If fences are placed across the easement, 16-foot wide gates are required for access along the easements.

In addition, Western maintains the Captain Jack-Olinda 500-kV line, but it is owned by the Transmission Agency of Northern California (TANC). Please contact Mr. Donald Wagenet at Navigant Consulting, 3100 Zinfandel Drive, Suite 600, Rancho Cordova, CA 95670, for their restrictions and or concurrence.

If you have any questions, please contact Ms. Susan Sinclair at (916) 353-4600.

Sincerely,

Susan Sinclair
Dr

Heidi R. Miller
Realty Specialist

4 Enclosures

cc:

Mr Donald Wagenet (w/copies of enclosures)
Navigant Consulting
3100 Zinfandel Drive, Suite 600
Rancho Cordova, CA 95670

DEED RESTRICTIONS FOR PHASE 3, 4, 5, 6 and 7
FOR THE PANORAMA PLANNED DEVELOPMENT

The United States Government maintains the Captain Jack-Olinda, Round Mountain-Cottonwood, Airport-Cottonwood, Shasta-Cottonwood No 1. and No. 2, and Cottonwood-Olinda No. 1 and No. 2, transmission line easements for the right to operate, patrol, repair, maintain, use, construct, and reconstruct an electrical transmission line. The width of the Captain Jack-Olinda transmission line easement is 200 feet, the Round Mountain-Cottonwood easement is 125 feet, the Airport-Cottonwood easement is 100 feet, the Shasta-cottonwood No. 1 and No. 2 is 250 feet and the Cottonwood-Olinda easement is 125 feet wide.

The following activities are prohibited within the transmission line easement.

1. Owner shall not erect any structures. Structures, by way of example, not by limitation, shall mean buildings, mobile homes, signs, storage tanks, septic systems, swimming pools, tennis courts, or similar facilities.
2. Owner shall not drill wells or conduct mining operations.
3. Owner shall not grant permission to the public for the use of the easement area. Such prohibited use shall include roads, parking areas, storage facilities, and recreation facilities.
4. Owner shall not appreciably change the character of existing topography. Normal gardening practices may be conducted but trees/vegetation that will exceed 12 feet in height at full maturity are prohibited.
5. Owner shall not erect or install fences on or across the easement area without first submitting the fence plans for review.

Requests for permission to use the transmission line right-of-way should be submitted to the Western Area Power Administration, Sacramento Area Office, Attention Linda E. Castle N1610 114 Parkshore Drive, Folsom, California, 95630.

**WESTERN AREA POWER ADMINISTRATION
GENERAL GUIDELINES CONCERNING THE USE OF
ELECTRIC TRANSMISSION LINE RIGHTS-OF-WAY**

Western Area Power Administration (Western) owns a right-of-way easement along the length of the transmission line (width varies by transmission line). Western's rights within the easement include the right to construct, reconstruct, operate, maintain, and patrol the transmission line.

Rights usually reserved to the landowner include the right to cultivate, occupy, and use the land for any purpose that does not conflict with Western's use of its easement. To avoid potential conflicts, it is Western's policy to review all proposed uses within the transmission line easement. We consider (1) Safety of the public, (2) Safety of our Employees, (3) Restrictions covered in the easement, (4) Western's maintenance requirements, and (5) Protection of the transmission line structures and (6) Road or street crossings.

The outline below lists the considerations covered in the review. Please note that some items may overlap. This outline has been prepared only as a guide; each right-of-way encroachment is evaluated on an individual basis.

1. Safety Of The Public

- A. Approval depends, to a large extent, on the type and purpose of the development. Western takes our obligation to public safety very seriously. To insure our obligation, any use of the easement that will endanger the public will not be allowed or strongly discouraged (e.g., kite flying is prohibited).
- B. Metal fences must be grounded in accordance with applicable safety codes.
- C. Lighting standards shall not exceed a maximum height of 15 feet and not placed directly under the conductors (wires). All lighting standards must be grounded.
- D. All vegetation on the easement shall not exceed a maximum height of 12 feet at maturity.
- E. Structures are not allowed on the easement. Structures include, but are not limited to, buildings, sheds, swimming pools, basketball courts, tennis courts, gazebos, etc.
- F. No ground elevation changes are allowed which would reduce the ground to conductor clearance below 30 feet.

2. Safety Of Our Employees

Vegetation and encroachments into our right-of-way requires our crews to take action, which places them at risk. Therefore, any vegetation or encroachments that present a risk to our employees will not be allowed.

3. Restrictions Covered In The Easement

The easement prohibits the following: (1) any use that will interfere with or damage the equipment of the United States, (2) digging or drilling of a well, (3) erecting buildings or structures, (4) placing or piling up material within the easement boundaries. The easement gives Western the right to remove trees, brush or other objects interfering with the safe operation and maintenance of the line.

4. Maintenance Requirements

- A. Berms shall not be placed next to the base of the transmission line tower.
- B. Any proposed improvements to the easement (including grading, parking lot, lighting, landscaping, fences, etc.), must be reviewed by Western to assure that they will not interfere with the safe operation and maintenance of the transmission line.
- C. A 14-foot gate is required in any fences that cut off access along our easement.
- D. Thirty (30) feet of unobstructed access is to be maintained around towers.

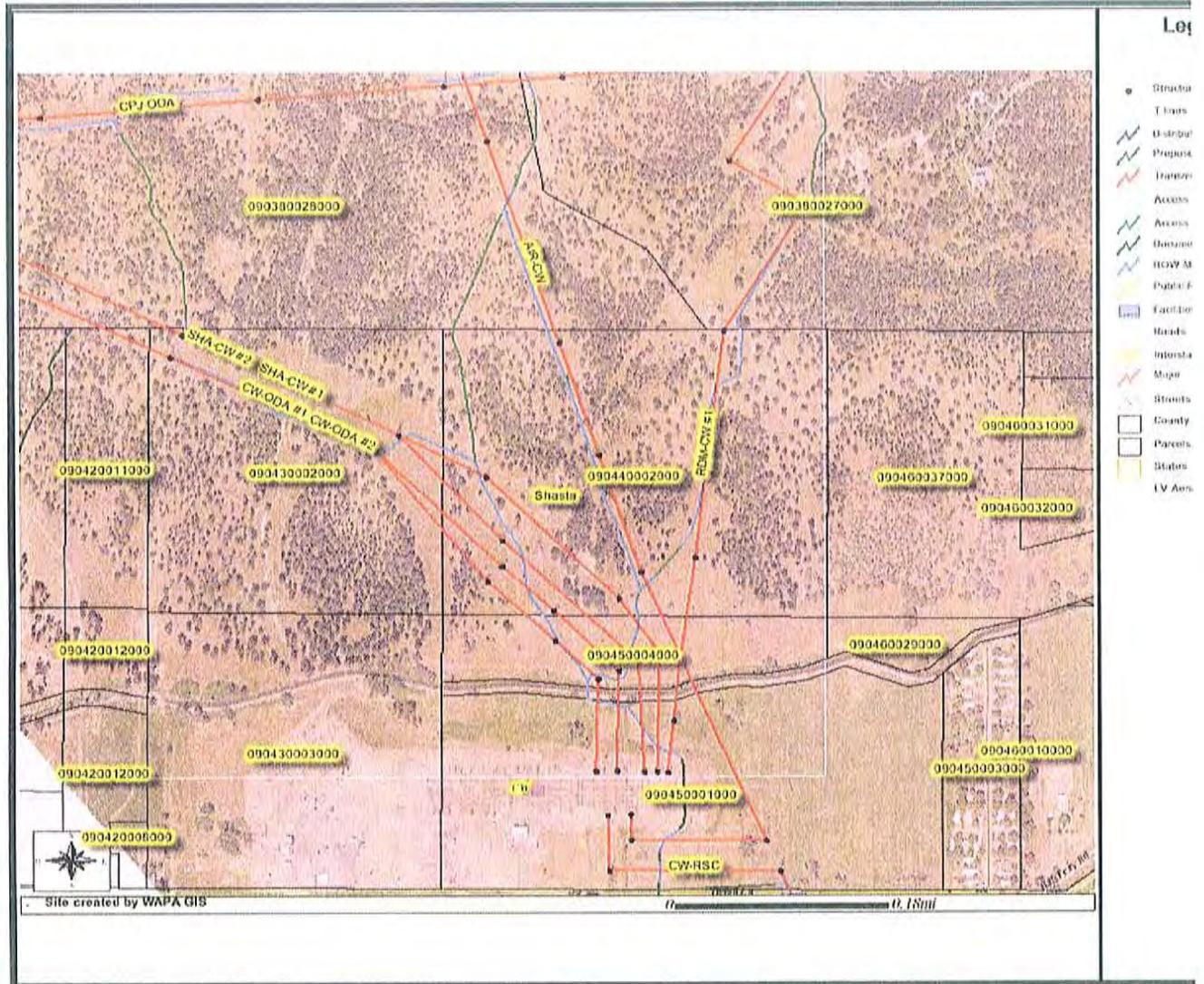
5. Protection Of The Transmission Line Structure (Towers, Guy Wires, etc.)

- A. If the proposed use increases the possibility of a motor vehicle hitting the transmission line structure, an appropriate guard rail shall be installed to protect the structure (e.g., parking lots or roads).
- B. Trench digging, which would weaken or damage the structure, is prohibited.
- C. No ground elevation changes are allowed within 20 feet of the structure, and in no case shall the conductor to ground clearance be reduced below code limitation.

6. Roads Or Street Crossings

Western's policy is to have roads or streets cross the easement at right angles, or as nearly at right angles as possible, so that a minimum area of the road or street lies within the transmission line easement.

Requests for permission to use the transmission line right-of-way should be submitted to:
Western Area Power Administration, Sierra Nevada Regional Office, Attn: Realty Officer,
114 Parkshore Drive, Folsom, CA 95630.



STATE OF CALIFORNIA -- THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 942360001
(916) 653-5791

March 24, 2008

Kent Hector
Shasta County Planning Division
Department of Resource Management
1855 Placer Street, Suite 103
Redding, California 96001DEPARTMENT OF
RESOURCE MANAGEMENT
RECEIVED

MAR 28 2008

PLANNING/BUILDING
DIVISIONSPanorama Planned Development
State Clearinghouse (SCH) Number: 2008022104

The project corresponding to the subject SCH identification number has come to our attention. The limited project description suggests your project may be an encroachment on the State Adopted Plan of Flood Control. You may refer to the California Code of Regulations, Title 23 and Designated Floodway maps at <http://recbd.ca.gov/>. Please be advised that your county office also has copies of the Board's designated floodway for your review. If indeed your project encroaches on an adopted flood control plan, you will need to obtain an encroachment permit from the Central Valley Flood Protection Board prior to initiating any activities. The attached Fact Sheet explains the permitting process. Please note that the permitting process may take as much as 45 to 60 days to process. Also note that a condition of the permit requires securing all of the appropriate additional permits before initiating work. This information is provided so that you may plan accordingly.

If after careful evaluation, it is your assessment that your project is not within the authority of the Flood Board, you may disregard this notice. For further information, please contact me at (916) 574-1249.

Sincerely,

for Christopher Witt
Staff Environmental Scientist
Floodway Protection Section

Enclosure

Cc: Governor's Office of Planning and Research
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, California 95814

Received Time Sep. 24. 11:21AM

Encroachment Permits Fact Sheet

Basis for Authority

State law (Water Code Sections 8534, 8608, 8609, and 8710 – 8723) tasks The Central Valley Flood Protection Board ("The Board") with enforcing appropriate standards for the construction, maintenance, and protection of adopted flood control plans. Regulations implementing these directives are found in California Code of Regulations (CCR) Title 23, Division 1.

Area of The Central Valley Flood Protection Board Jurisdiction

The adopted plan of flood control under the jurisdiction and authority of The Board includes the Sacramento and San Joaquin Rivers and their tributaries and distributaries and the designated floodways.

Streams regulated by The Board can be found in Title 23 Section 112. Information on designated floodways can be found on The Board's website at <http://www.recbd.ca.gov/maps/index.cfm> and CCR Title 23 Sections 101 - 107.

Regulatory Process

The Central Valley Flood Protection Board ensures the integrity of the flood control system through a permit process (Water Code Section 8710). A permit must be obtained prior to initiating any activity, including excavation and construction, removal or planting of landscaping within floodways, levees, and 10 feet landward of the landside levee toes. Additionally, activities located outside of the adopted plan of flood control but which may foreseeable interfere with the functioning or operation of the plan of flood control is also subject to a permit of The Board.

Details regarding the permitting process and the regulations can be found on The Board's website at <http://recbd.ca.gov/> under "Frequently Asked Questions" and "Regulations," respectively. The application form and the accompanying environmental questionnaire can be found on The Board's website at <http://www.recbd.ca.gov/forms/index.cfm>.

Application Review Process

Applications when deemed complete will undergo technical and environmental review by The Board and/or Department of Water Resources staff.

Technical Review

A technical review is conducted of the application to ensure consistency with the regulatory standards designed to ensure the function and structural integrity of the adopted plan of flood control for the protection of public welfare and safety. Standards and permitted uses of designated floodways are found in CCR Title 23 Sections 107 and Article 8 (Sections 111 to 137). The permit contains 12 standard conditions and additional special conditions may be placed on the permit as the situation warrants. Special conditions, for example, may include mitigation for the hydraulic impacts of the project by reducing or eliminating the additional flood risk to third parties that may be caused by the project.

Additional information may be requested in support of the technical review of your application pursuant to CCR Title 23 Section 8(b)(4). This information may include but not limited to geotechnical exploration, soil testing, hydraulic or sediment transport studies, and other analyses may be required at any time prior to a determination on the application.

Environmental Review

A determination on an encroachment application is a discretionary action by The Board and its staff and subject to the provisions of the California Environmental Quality Act (CEQA) (Public Resources Code 21000 et seq.). Additional environmental considerations are placed on the issuance of the encroachment permit by Water Code Section 8608 and the corresponding implementing regulations (California Code of Regulations – CCR Title 23 Sections 10 and 16).

In most cases, The Board will be assuming the role of a "responsible agency" within the meaning of CEQA. In these situations, the application must include a certified CEQA document by the "lead agency" [CCR Title 23 Section 8(b)(2)]. We emphasize that such a document must include within its project description and environmental assessment of the activities for which are being considered under the permit.

Encroachment applications will also undergo a review by an interagency Environmental Review Committee (ERC) pursuant to CCR Title 23 Section 10. Review of your application will be facilitated by providing as much additional environmental information as pertinent and available to the applicant at the time of submission of the encroachment application.

These additional documentations may include the following documentation:

- California Department of Fish and Game Streambed Alteration Notification (<http://www.dfg.ca.gov/1600/>),
- Clean Water Act Section 404 applications, and Rivers and Harbors Section 10 application (US Army Corp of Engineers),
- Clean Water Act Section 401 Water Quality Certification, and
- Corresponding determinations by the respective regulatory agencies to the aforementioned applications, including Biological Opinions, if available at the time of submission of your application.

The submission of this information, if pertinent to your application, will expedite review and prevent overlapping requirements. This information should be made available as a supplement to your application as it becomes available.

Transmittal information should reference the application number provided by The Board.

In some limited situations, such as for minor projects, there may be no other agency with approval authority over the project, other than the encroachment permit by The Board. In these limited instances, The Board may choose to serve as the "lead agency" within the meaning of CEQA and in most cases the projects are of such a nature that a categorical or statutory exemption will apply. The Board cannot invest staff resources to prepare complex environmental documentation.

Additional information may be requested in support of the environmental review of your application pursuant to CCR Title 23 Section 8(b)(4). This information may include biological surveys or other environmental surveys and may be required at anytime prior to a determination on the application.



**Pacific Gas and
Electric Company**

Jason Thomas
Land Agent
3600 Meadow View Dr.
Redding, CA. 96002
Technical & Land Services

Phone: (530) 246-6548
email: jatx@pge.com

March 3, 2008

DEPARTMENT OF
RESOURCE MANAGEMENT
RECEIVED

MAR 05 2008

PLANNING/BUILDING
DIVISIONS

County of Shasta
Department of Resource Management
1855 Placer Street, Suite #103
Redding, CA 96001
Attn: Kent Hector, Senior Planner

Re: Notice of Preparation of an Environmental Impact Report, Panorama Planned Development

Mr. Kent Hector,

Thank you for giving us the opportunity to review and comment on the above mentioned notice.

PG&E currently owns and operates the following electric transmission lines within the project area: the Round Mountain-Cottonwood #2 (230kV), the Round Mountain-Cottonwood #2 (230kV), Pit #1-Cottonwood (230kV), and the Cottonwood-Panorama (115kV). PG&E owns and operates these transmission lines by virtue of the following easements: Book 412 at page 167, Volume 267 at page 2, Volume 217 at page 297, Volume 217 at page 108, Volume 139 at page 220, Volume 756 at page 672, and Volume 217 at page 132, all of the Official Records of the County of Shasta.

Please be advised that no work should be performed on PG&E Company property (SBE# 135-45-26A-1, 135-45-80-1, and 135-45-80-2) which is located adjacent to the project area and no work should be performed within the aforementioned power line easements without the prior written consent of Pacific Gas & Electric Company.

PG&E also owns and operates gas transmission and distribution lines along the county roads known as Balls Ferry Road and Treefoil Lane by virtue of the Franchise Agreement.

If a conflict is identified between this project and our facilities, please notify me at the letterhead address.

If you have any questions or concerns, please contact me at the above letterhead address.

Sincerely,

Jason Thomas
Land Agent

MEMORANDUM

DEPARTMENT OF RESOURCE MANAGEMENT
1855 Placer Street, Redding, CA 96001

Environmental Health

Suite 201
225-5787

Administration

Suite 200
225-5789

Air Quality Management District

Suite 101
225-5674

Planning Division

Suite 103
225-5532

Community Education Section

Suite 200
225-5789

Building Division

Suite 102
225-5761

TO: Kent Hector, Senior Planner

FROM: Adam Fieseler, Air Pollution Inspector II *af*

DATE: March 17, 2007

SUBJECT: Panorama Planned Development, NOTICE OF PREPARATION

The Shasta County Air Quality Management District has reviewed the Notice of Preparation for the Panorama Planned Development as requested in your letter dated February 19, 2008.

The Environmental Initial Study indicates that the project may have potentially significant impact on air quality. Mitigation and monitoring of these potential impacts will be determined by additional data, analysis, and recommendations of the Environmental Impact Report (EIR). The EIR will typically review the impacts on the Attainment Plan, air quality standards for criteria pollutants, cumulative effect with state air quality standards, receptor exposure to conventional pollutants and precursors, and odors. The EIR will likely analyze the construction and operation emissions for conventional pollutants using emission significance thresholds provided in the Shasta County General Plan, and compare them to emissions calculated via the URBEMIS program. Reasonable mitigation measures will be proposed based on this comparison.

With the signing of Executive Order S-3-05 by Governor Arnold Schwarzenegger and the state legislature enacting the Global Warming Solutions Act of 2006, adverse effects of the project's impact needs to be identified on the global-scale phenomenon of climate change. The EIR should analyze the project's global warming impacts by performing the same analysis that was used for conventional pollutants. The EIR analysis should calculate emissions of greenhouse gases (GHG) for the construction and operation of the project.

Impacts from a project are typically compared with the significance thresholds established by the decision making authority. While no GHG significance thresholds have yet to be promulgated, one of three basic paths of significance must be considered.

These are:

No significance threshold for greenhouse gas emissions;
GHG emissions threshold set at zero; or
GHG threshold set at a non-zero level.

While the no significance threshold path currently exists in Shasta County by default, the nature of the cumulative impact of GHG on global warming indicates that a significance threshold of zero or near zero would be appropriate. Any non-zero significance threshold adopted for GHG emissions would be at a level low enough to ensure that a large percentage of projects would be evaluated for mitigations. This project with approximately 130 acres of development will have greenhouse gas emissions that would be expected to be above any reasonable threshold and therefor should be evaluated.

The Shasta County Air Quality Management District recommends that the EIR include modeling for GHG emissions. URBEMIS can be used for construction emission modeling, and any traffic study data associated with the project operation. The California Climate Action Protocol v2.2 can be used to model indirect GHG emissions from energy use during project operation.

Should greenhouse gas emissions be found to increase above the no-project option, then mitigation measures should be discussed in the Environmental Impact Report.

Shasta Mosquito and Vector Control District

MANAGER • WILLIAM C. HAZELEUR

DISTRICT OFFICE • 19200 LATONA ROAD, ANDERSON, CA 96007

MAILING ADDRESS • P. O. BOX 990331, REDDING, CA 96099-0331

PHONE (530) 365-3768 • FAX (530) 365-0305

E-mail shastamvcd@clearwire.net

DEPARTMENT OF
RESOURCE MANAGEMENT
RECEIVED

JAN 31 2007

PLANNING/BUILDING
DIVISIONS

January 30, 2007

Attention: Bill Walker, Senior Planner

Shasta County Department of Resource Management

Planning Division

1855 Placer Street

Redding, CA. 96001

Subject: Tract Map 1960, Panorama Planned Development

Dear Mr. Walker,

Our Agency wishes to offer the following comments regarding the above proposed project:

1. Access to all detention basins, storm drain outfalls, wetlands and natural drainages and ponds for mosquito control operations.
2. Detention basins incorporated into this project should have the bottoms of the detention basins graded in a manner to channel water during low summer flows, from inflow pipes to out flow pipes to discourage spreading of water and vegetation growth.
3. Our Agency would like to request the inspection of the detailed grading and drainage plans, when available, for further comments and signature.

Sincerely,

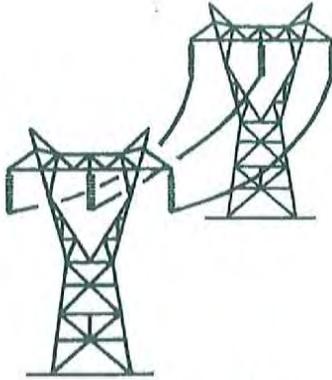


Audie Butcher
Operations Supervisor

William C. Hazeleur
Manager

P.C.

Sharrah Dunlap Sawyer Inc.
3161 Bechelli Lane, Suite 100
Redding, CA. 96001



TRANSMISSION AGENCY OF NORTHERN CALIFORNIA

P.O. Box 15129, Sacramento, CA 95851-0129 (916) 852-1673

March 19, 2008

County of Shasta
Department of Resource Management
Attention: Kent Hector, Senior Planner
1855 Placer Street, Suite 103
Redding, California 96001

Subject: California Environmental Quality Act (CEQA) Comments on the Notice of Preparation of an Environmental Impact Report, Panorama Planned Development

Dear Mr. Hector:

The Transmission Agency of Northern California (TANC) appreciates the opportunity to provide these comments to the Shasta County Planning Department regarding the Panorama Planned Development. TANC is submitting these comments consistent with CEQA Guidelines Section 15082 in its capacity as an owner and the Project Manager of the California-Oregon Transmission Project (COTP), an existing 500-kilovolt (kV) transmission line extending from near Malin, Oregon south to the Tracy Area located in central California. Operations and maintenance responsibilities for the COTP are provided to TANC by the United States Department of Energy, Western Area Power Administration (Western). Approximately 2,450 lineal feet of the 200-foot wide right of way (i.e. 11.25 acres) for the COTP currently runs through the area planned for construction of the Panorama Planned Development.

Our comments are based on our review of the following documents:

1. Notice of Preparation of an Environmental Impact Report, Panorama Planned Development.
2. Notice of Completion and Environmental Document Transmittal; Panorama Planned Development.
3. Panorama Planned Development TR-960 Sheets 1-11 of 11 (Sharrah, Dunlap, Sawyer Inc) available from the Shasta County website.
4. Other available maps and drawings.

Based on our review, we have the following comments and concerns regarding the development.

A Public Entity whose Members include:
Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Modesto Irrigation District,
Palo Alto, Plumas-Sierra Rural Electric Cooperative, Redding, Roseville,
Sacramento Municipal Utility District, Santa Clara, Turlock Irrigation District, Ukiah

1. Construction work under or near the 500-kV energized lines must be performed with the greatest care and skill, and has the potential for inducing currents and static charges without any physical contact. Construction activities could therefore have public health and safety impacts, and impacts to COTP operations and maintenance (O&M) activities (utilities and service systems).
2. Because of their COTP O&M responsibilities, Western submitted comments under separate cover (March 10, 2008) that include Deed Restrictions for Phase 3, 4, 5, 6, and 7 for the Panorama Planned Development, and Western's General Guidelines Concerning the Use of Electric Transmission Line Rights-of-Way. In addition to those restrictions and guidelines, which are incorporated by reference in and attached to these comments, TANC recommends that contractors selected to construct the Panorama Planned Development also be required to obey the following precautions:
 - All drainage contours should divert drainage away from all tower footings and foundations.
 - Maintain all construction equipment, vehicles, personnel, and activities a minimum distance of 30 feet from the COTP conductors at all times.
 - Ground all backhoes and other vehicles and equipment with portable ground wires.
 - No vehicles, equipment, or materials or personnel to be parked, left, stored, or camped within the easement area.
 - No burning is allowed in the COTP right of way.
 - No storage of combustible materials is allowed on the COTP right of way.
 - No blasting is allowed in the COTP right of way.
 - No obstructions, blockages, or any other reductions in the length and/or width of the existing access roads are permitted.
 - No signs will be allowed in the right of way.
3. Please note that the Grants of Easement to TANC for the COTP allow, among several other rights, certain O&M rights and the rights to manage vegetation, including: "The right at any time and from time to time to trim and to cut down and clear away or otherwise destroy any and all trees and brush on either side of the Easement Area which [now or hereafter] in the opinion of TANC are or may be a hazard to said transmission facilities, or which may interfere with the exercise of TANC's rights hereunder..." These rights are becoming more

important, and being exercised more aggressively in light of strong national policies requiring transmission system reliability and supporting vegetation and fuels management efforts of Transmission Owners. TANC and Western may exercise our vegetation management rights to their full extent if needed to maintain transmission line security and reliability.

4. We urge the landowners of the Panorama Planned Development and Shasta County staff to examine and become familiar with the terms of the Grant of Easement to TANC, particularly as they pertain to TANC's rights and any potential conflicts and or issues that may arise related to TANC or Western's conduct, or the appearance of the lands and vegetation within the Easement Area to residents and users of nearby lands.
5. The Notice of Completion and Environmental Document Transmittal; Panorama Planned Development (page 13) states that "The project is located in a very high fire hazard severity zone. Significant additional levels of fire protection may be necessary." Many of the precautions we have listed in our previous comments are related to direct or indirect causes and/or hazards of a fire that could adversely affect the transmission line and supporting facilities, including arcing that could shut down the high-voltage electric grid in the western region. We urge the applicant and Shasta County to provide adequate fire protection to eliminate or minimize the potential causes of a fire under or near the COTP, including public access to the right of way.
6. Please add the following name and address to your distribution list for all CEQA notifications for the Panorama Planned Development:

Transmission Agency of Northern California
Attention: Don Wagenet
P.O. Box 15129
Sacramento, CA 95851-0129

Thank you for the opportunity to submit these comments. Please do not hesitate to call me at (916) 852-1673 if you have any questions.

Sincerely,



Don Wagenet
Transmission Agency of Northern California



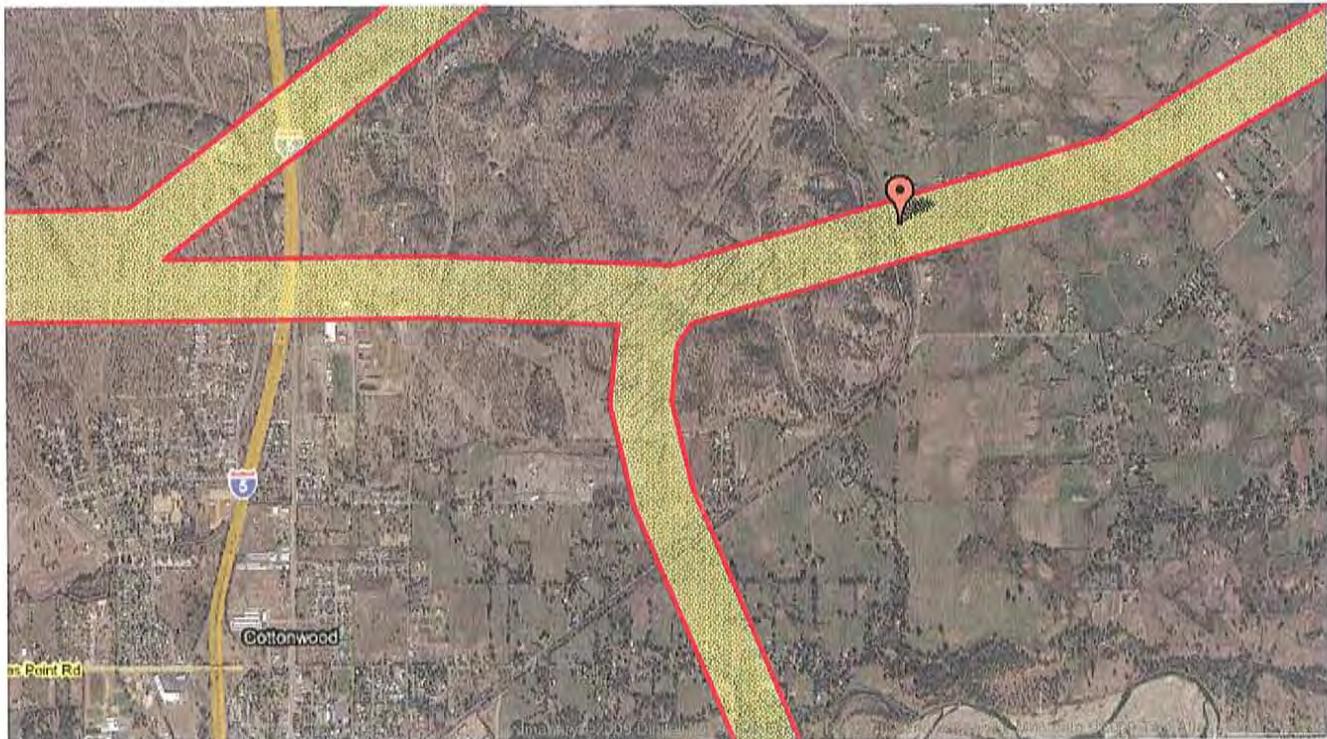
TANC Transmission Project

ADDRESS LOOK-UP

The proposed study areas shown on the map are preliminary and subject to change based on public scoping comments (due May 31, 2009) and alternatives development and refinement. The map indicates proposed study areas as of 2/5/09. Proposed study areas are 1000 feet wide; if the project were to be constructed, typically a 200-foot-wide easement would be used. Due to the preliminary nature of the study areas, proposed substations and associated electrical facilities (e.g., compensation stations) are not shown on this application. Please refer to the project maps posted at <http://www.wapa.gov/transmission/ttp.htm> for the general location of proposed substations and associated electrical facilities. Following comments received from the public scoping, and with the addition of on the ground studies in early 2009, these alternatives may be adjusted to address the public's concerns or avoid areas discovered during the on the ground analysis.

GoogleMap search for address locations is only as accurate as the data provided from Google and TeleAtlas. Various data sources and accuracy levels are used to compile street data from 3-rd party sources. User should be aware that locations mapped by this application may not be correct. All mapping errors are the sole responsibility of Google and TeleAtlas.

DRAFT



To zoom in or out, use the "+" and "-" buttons in the upper left corner.



DEPARTMENT OF
RESOURCE MANAGEMENT
RECEIVED

FEB 14 2007

6270 Parallel Road, Anderson, CA 96007-4833 · Phone: (530) 365-7332 · Fax: (530) 365-7371

February 12, 2007

Paul Bolton, Senior Planner
Shasta County Department of Resource Management
1855 Placer Street, Suite 103
Redding, CA 96001

RE: Tract Map 1960, Zone Change 07-004 and General Plan Amendment 07-001

Dear Mr. Bolton:

We are responding to the proposed residential subdivision of 446 single-family lots on approximately 307 acres. In reviewing the map of the property, we are concerned about erosion control to keep sediment from finding its way into waterways and stormwater runoff, which if not managed can result in erosion, riparian areas and wetlands, as contributors to the changes in surface, groundwater and pre-development fuels treatment to create a fire-safe development before homes are built, and fire access/egress for adequate equipment access during an emergency.

EROSION CONTROL

The County should incorporate adequate erosion and sediment control measures to provide minimum requirements to control water quality impacts from accelerated erosion due to construction activities. We urge the County to insure the property owner follow those standards and if none are in place, we reference those published in the "County of Shasta Erosion and Sediment Control Standards Design Manual." In particular, following the principles detailed in that document where necessary during construction, such as:

- minimize disturbance and soil exposure by retaining natural vegetation, adopting phased construction techniques, and using temporary cover;
- vegetate and mulch all denuded areas to protect the soil from winter rains;
- utilize proper grading, barriers, or ditches to minimize concentrated flows and divert runoff away from denuded slopes or other critical areas;
- minimize the steepness of slopes and control the length of slopes by utilizing benches, terraces, contour furrows, or diversion ditches;
- keep any sediment on-site by utilizing sediment basins, traps or sediment barriers;
- monitor and inspect sites frequently to assure the measures are functioning properly and correct problems promptly.

STORMWATER RUNOFF

We feel it is very important this project use Best Management Practices to limit the amount of stormwater runoff from the project site. Unmanaged stormwater runoff causes erosion, downstream flooding, streambank erosion and pollutes waterways. The cumulative effects of stormwater runoff are evident throughout the Redding area. Best Management Practices include retaining vegetation buffers, minimizing the amount of impervious area to the maximum extent possible, cluster development, using landscaping designs that add infiltration capacity or detention/retention.

RIPARIAN AREAS AND WETLANDS

As you know, the degradation of riparian areas and wetlands throughout the valley is recognized as contributors to the changes in surface and groundwater and periodic flooding problems. Riparian habitat provides riverbank protection, erosion control and improved water quality, as well as numerous other values. This project site drains to Dry Creek riparian habitat.

PRE-DEVELOPMENT FUELS TREATMENT

We feel the application should in some way address hazardous fuel problems before development is permitted to proceed. The California Fire Plan, published by the State Board of Forestry, states: "The public doesn't sufficiently understand the risks and impacts of wildfires on natural resource assets, structures and people living and recreating in California wildlands. Agencies have not adequately communicated those risks."

Past fire seasons brings to light more than usual the importance of reducing the fuel hazard in areas where homes are built before development occurs, so that the level of maintenance needed to minimize the fuels from again reaching hazardous conditions, is reasonable. We believe that the County is the lead agency responsible for assuring new residents moving into wildland areas are initially protected by pre-development fuels management and are educated through the permitting process so they do not unknowingly choose to live in areas where natural accumulations of fuel put them, their homes and families, at significant risk.

We suggest the Department include pre-development fuels management in the application requirements in order to create a fire-safe development before homes are built. In doing so, the natural resources in the area will also be more protected.

FIRE ACCESS/EGRESS

Because of the heavy brush loadings and variable terrain of the Project site and its surroundings, it appears that fire equipment access to (and personnel escape from) portions of the Project as proposed are inadequate. It is recommended that dedicated emergency access be established.

Thank you for contacting us about this proposed project.

Sincerely,



Phil Schoefer, President
Board of Directors