Letter 48 – James and Tresa Griffith (December 11, 2017)

COMMUNICATIONS

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Courtney Mathews

From: Courtney Mathews
Sent: Monday, December 11, 2017 8:39 AM
To: James Griffith; Shasta County BOS
Cc: Clerk of the Board
Subject: RE: Tierra Robles Draft EIR Comment

Thank you James. Your email and attachment will be distributed as correspondence to the Board of Supervisors for the January 9, 2017 meeting. Please bring 10 copies if you wish the Board to have the document for review at the December 12, 2017 meeting. If you have any further questions please contact us. Thank you.

Courtney Mathews
Deputy Clerk of the Board | 530-225-5261

Shasta County Board of Supervisors
Clerk of the Board | 530-225-5550
1450 Court Street Suite 308B
Redding, California 96001-1673

-----Original Message-----
From: James Griffith [mailto:flynpig1@gmail.com]
Sent: Sunday, December 10, 2017 3:35 PM
To: Shasta County BOS
Subject: Tierra Robles Draft EIR Comment

Please include the attached PDF document into the public comments on the Tierra Robles Draft EIR. If this is not possible and I need to bring in a copy for each Supervisor please let me know. 48-a

Thank You,

James Griffith

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1

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My Response to the Tierra Robles Draft EIR

I have been a resident of Palo Cedro since 1999 and I moved here specifically for the rural community and lifestyle, with the expectation that with the county zoning it would remain that way. I am also an agricultural water user on the Bella Vista Water system. I only learned of the Tierra Robles project in November 2017 and these are1 my first comments on the issue. 48-b

I have copied several sections from the Draft EIR published on the Shasta County website and included them in my comments below. The copied portions are in *italics*, my response is in **bold.**

5.17 UTILITIES AND SERVICE SYSTEMS

Page 5-17-9
Telephone
AT&T provides telephone, internet, and television services to the majority of the Redding area and areas south of Boyle Drive, while Frontier Telephone provides service to Palo Cedro, Bella Vista, Millville, and areas north of Boyle Drive. The proposed project is located within the Frontier local service area. Currently, the proposed project has no telephone landline infrastructure or services; however, existing Frontier facilities are located along Boyle Drive. Extension of service infrastructure from Boyle Drive would occur below ground and implemented concurrent with project implementation. 48-c

Internet Services
AT&T or a wireless internet service provider such as HughesNet, have the existing infrastructure to provide internet access to the proposed project. Internet would be provided via DSL or wireless, and television service is expected to be provided by a satellite provider. Currently, there are no cable services located within the proposed project boundaries and there does not appear to be any existing cable service to nearby residences. **According to the 11.0 Organizations and Persons Consulted, Frontier Communications has not even been consulted. However, AT&T has been consulted and they are not going to provide any services. See page 11-4.**

Why even mention AT&T unless the study is trying to imply that AT&T is an option? Everyone that I have spoken with that lives in the Frontier service area already experiences significant slow speeds in DSL and even loss of service regularly. Frontier tech support has told me many times that the reason for this is that there is high demand and too many people using the system. This needs to be addressed or this project will only make access to phone and internet even worse for those currently living in the Frontier service area. 48-c Cont.

From the Tully and Young Memorandum dated April 26, 2017

Page 10
2.2.3 Summary of Residential Demand Factors
The indoor and outdoor residential demand factors are presented in Table 2-1. Combined, each lot is estimated to use 0.45 acre-feet per year for lots with only primary homes, and 0.48 for the 15 lots with secondary units. **These estimates are extremely conservative. During the drought restrictions placed on agricultural users we were allotted .61 af per year and we were told that was the minimum for health and safety. During the drought years there were mandated conservation efforts to reduce water demand. The estimated water usage is so low that there is no room for conservation during dry years.** 48-d

From the Draft EIR, *5.17 UTILITIES AND SERVICE SYSTEMS*

Page 5.17-4
Water
Normal and Dry-Year Supply Reliability
BVWD depends on its long-term contract to purchase water from the USBR and their groundwater wells. As a water provider that is predominantly reliant upon the CVP, BVWD is subject to significant water supply uncertainty and shortages due to dry hydrologic conditions, compounded by operational and regulatory constraints both directly and indirectly related to the Federal Endangered Species Act (FESA). The water supply reliability goal of BVWD is to meet 100 percent of demand in normal years.

During single dry year conditions, BVWD's water supplies are projected to be insufficient to meet demand. **Thats just a single dry year!**

As shown in Table 5.17-4, SINGLE DRY YEAR SUPPLY AND DEMAND, this shortfall is projected to exceed 7,000 AF. The agricultural amounts were maintained to show the impact of a multiple-dry year for the consideration of the supplemental supply program BVWD offers to agricultural customers. **In just a single dry year BVDW's own projections show a shortfall of 7000 AF! Bella Vista Water District has entered into long term contracts through 2030 with USBR and 2045 with ACID. These contracts were entered into before the additional demands of this project were needed. That means that the project water will have to come from the water intended for the districts users that are currently in place. This will be significant during drought years. Here's why.**

Water restrictions are based upon unconstrained water usage years. If we were to have a drought in the years shortly after the project began, water usage would be restricted to 48-e

BVWD based on the water usage before the additional 166 houses. The water needed for these additional houses would have to come from the current users unless BVWD and it's water suppliers enter into new agreements. 48-e Cont.

I don't believe that putting additional demands on the Bella Vista Water system will be good for anyone currently on the BVWD system. It will likely benefit the water district through increased fees per gallon of water pumped, but have negative impact on current users. I am currently an agricultural user who has had their water reduced to health and safety minimums and had to let my hay field die during the during the drought years. BVWD has already stated that even in a single dry year they are unable to meet the demand.. The water I was allotted during the drought years would not even cover my house and animals without having to buy supplemental water for thousands of dollars (which is not a guaranteed source), even with my personal mitigation measures which have already cost thousands more dollars., and I was allotted 30% more than what these lots are estimated to use in an unconstrained year. 48-f

BVWD is paid higher fees from residential users than from agricultural users per gallon of water. BVWD will likely have a financial benefit from this project and that may create a conflict of interest if they are in support of this project.

15.9 TRAFFIC IMPACT STUDY

Page 10
Old Alturas Road (Deschutes Rd to 7 Lakes Rd):
This section of rural roadway has a collision rate 33% higher than the statewide average for similar facilities. It is estimated that 17% of the project traffic will use this section of roadway which will increase the ADT by 27%.

The increase in traffic, in combination with the overall very low traffic volumes and LOS A conditions (documented in a subsequent section of this report), is not expected to significantly increase the rate of collisions. **How can you, in good faith, state that a road already which has a 33% higher than average accident rate, increase ADT by 27% and then state that this will not significantly increase traffic accidents? This is slight of hand, they mention accident rates, not accidents! There will be an increase in accidents, even if the rates remain the same because the ADT has increased!** 48-g

Old Alturas Road (Boyle Rd to Old Oregon Trail):
The collision rate is 9% higher than the statewide average for similar facilities. It is estimated that 61%-62% of the project traffic will use this section of roadway which will increase the ADT by 24% in the Existing Plus Project conditions and by 22% in the Year 2035 Plus Project conditions.
A collision rate 9% higher than the statewide average for similar facilities is not statistically significant and is considered to be within a normal and expected range.
However, when there is an increase of ADT by 24%, will the number of accidents still be insignificant?

Deschutes Road (Boyle Rd to SR 44):
The collision rate is 38% higher than the statewide average for similar facilities. Just south of Boyle Road, it is estimated that 15% of the project traffic will use this section of roadway which will increase the ADT by 5%. ***As stated in the study,*** **this section is already 38% above the average for traffic collisions. This section includes a school zone with significant pedestrian traffic during the start and end of school and special events. The study makes no comment on how the increase in ADT will impact accidents or accident rates that are already high! This project will only increase the number of accidents due to the increased ADT.** 48-g Cont.

Currently lanes are so narrow that traffic is required to cross the double yellow lines in order to pass a bicycle, and pedestrians must walk on very narrow shoulders only inches from the roadway. 48-h

Old Oregon Trail (Old Alturas Rd to SR 44)
This section of road was not commented on in this study, this is remarkable for several reasons.

- **This section of road is expected to have an increase in ADT significant enough to recommend mitigation at SR 44 (intersections #10 and #11).**
- **The increase cannot be inferred from the intersection data (#8 and #9) found in this study because of flawed data.**
- **This section contains 4 intersections listed in this study (#8,#9,#10,#11).**
- **This section of road also contains Columbia Elementary School and a school zone.**

Yet no comments on this section of road in the traffic study. 48-i

Pages 35-36
Existing Plus Project: Project Mitigation
The following improvements are proposed to provide acceptable operations at intersections where a project significant impact is identified. Table 17 presents the mitigated LOS operations assuming these improvements. **There is already an example stated in this study where another mitigation project was planned and funded in 2008, yet still has not been constructed. Airport Road at SR 44 w/b.** 48-j

In addition, there will be a significant traffic safety impact on the Deschutes Road (Boyle Rd to SR 44) segment. **Why is there no mention that this "significant traffic safety impact" will occur in a school zone!** 48-k

Intersection 10: Airport Road & SR 44 WB Ramps:
This TWSC intersection is projected to operate at an unacceptable LOS F during both AM and PM peak hours during Year 2035 conditions. This intersection meets the peak hour signal warrant under Year 2035 AM and PM peak hour conditions. The following improvements will provide adequate capacity to result in acceptable LOS C or better conditions.

- *Install a Traffic Signal OR*
- *Install a Modern Roundabout*

Significance after Mitigation
Project mitigation is to pay traffic impact fee or/and fair share contribution towards the construction of these improvements. The stated improvement was planned and funded in 2008. **So this improvement was planned and funded in 2008, yet 9 years later has not been built.** 48-l

Intersection 13: Boyle Road & Deschutes Road:
This TWSC intersection is projected to operate at an unacceptable LOS F during AM peak hour Year 2035 conditions. This intersection meets the peak hour signal warrant under Year 2035 AM peak hour conditions. The following improvement will provide adequate capacity to result in acceptable LOS E or better conditions.
- *Install an All-Way Stop Control*

Significance after Mitigation
Project mitigation is to pay traffic impact fee or/and fair share contribution towards the construction of these improvements. The project impact till the improvement is constructed is unavoidable and significant. **There is already an example stated in this study where another this mitigation project was planned and funded in 2008, yet still has not been constructed.** 48-l Cont.

Deschutes Road (Boyle Rd to SR 44):
Installation of the following is recommended for Existing Plus Project conditions:
- *Caltrans standard W2 intersection warning signs with W16-8P advance street name plaques at Lassen View Drive, Beryl Drive, Sunny Oaks Drive, Wesley Drive, Robledo Road, Oak Meadow Road, Oak Tree Lane, and Coloma Drive.* **If simply installing signs at the street corners will have a significant impact on traffic safety, why has the county not installed them already on a road that has an accident rate 38% above average?** 48-m

Old Oregon Trail at Old Alturas Rd (Intersection #8)
The traffic counts shown are questionable. The AM traffic existing counts (151-113) are the same as the existing plus (151-113). The PM traffic existing counts (158-121) are the same as the existing plus (158-121). An obvious error! 48-n

Omni-Means Technical Memorandum Dated August 17, 2017

Intersection 13 – Deschutes Road & Boyle Road
This un-signalized intersection is projected to operate at LOS F in the weekday AM peak hour. Although this intersection operates at an unacceptable LOS F in the "no project" condition, the proposed project creates a significant impact by causing the delay to increase by more than 5 seconds per vehicle. The following improvement is proposed to mitigate the project impact to less than significant:
- *Construct an All-way Stop Control*

So the way to increase the LOS on Boyle is to decrease the LOS on Deschutes! This will require traffic on Deschutes currently traveling at 50+MPH to have to come to a full stop while in a curve. 48-o

Significance After Mitigation
Project mitigation is to construct the proposed improvements stated within the previous section. After mitigation, project generated impacts will be considered less than significant. **However, no mention of how this all-way stop will impact the traffic traveling at 50+ MPH on Deschutes.**

PROJECT TRIP DISTRIBUTION

According to the study, 20% of project traffic is expected to use Old Oregon Trail between Old Alturas Rd and SR 44, causing the ADT to change from 8031 to 8386. This increase leads to a recommended mitigation of installing a traffic signal/roundabout. 48-p

The study also shows that 15% of project traffic is expected to use Deschutes Rd between Boyle Rd and SR 44 causing the ADT to change from 8495 to 8761. This increase leads to a recommended mitigation of installing a street name signs along Deschutes Rd.

Why does Old Oregon Trail, with and ADT of 8386 seem to have a need for a signal/roundabout at SR 44 and Deschutes Rd, with 8761 and an accident rate 38% above average not need none?

5.16 TRAFFIC AND CIRCULATION
MITIGATION MEASURES
Level of Significance After Mitigation: The improvements identified for the intersections of Old Alturas Road & Old Oregon Trail (Intersection #8) and Boyle Road & Deschutes Road (Intersection #13) are not currently part of any current Shasta County improvement plan or fee program. As a result, full implementation as described in MM 5.16-3 and MM 5.16-4 cannot be assured by the project applicant. This is considered to be a cumulatively considerable and significant and unavoidable impact. **There is currently no plan to implement any mitigation measures at the 2 intersections most adversely impacted by this project.** 48-q

Recommended Mitigation Measures

Utilities 48-r
- Construct telephone and internet facilities adequate for the existing and existing plus demand.

Water 48-s
- BVWD has stated that they are unable to meet current demand with a single dry year. I don't know how the water demand can be mitigated.

Traffic 48-t
- Construct shoulders along Boyle Road, Old Alturas Road and Deschutes Road adequate for pedestrians and bicycles.
- Construct left turn lanes along Deschutes Road between Berkley Road and Boyle Road.
- Construct pedestrian sidewalks or pathways along Deschutes Road north of Foothill High School to Boyle Road.
- Construct a traffic signal/roundabout at Deschutes and SR 44 w/b.

Questions I believe need to be addressed: 48-u

- Why has telephone and internet service not been addressed?
- How can the homes conserve water during drought years when they are only estimated to use only 2/3 of the drought allotment given to other BVWD users?
- Why is it even under consideration to add 166 homes to a water system that says "During single dry year conditions, BVWD's water supplies are projected to be insufficient to meet demand"?
- Why are the school zones not addressed?

- Has anyone studied the Foothill High school and Columbia Elementary school traffic patterns when school starts and ends? If not shouldn't this be studied? If yes, why has that not been included in this report? 48-v
- Will the county actually install the traffic mitigation measures recommended in the EIR? If yes then when will they be installed? 48-w
- If a 4 way stop at Deschutes and Boyle is done to mitigate traffic issues on Boyle, why does the study not address how that will negatively impact traffic on Deschutes? 48-x
- Why was there no traffic study of Old Oregon Trail from Old Alturas Rd to SR 44?
- Will the flawed data at intersection #8 be corrected?
- Why does a road with and ADT of 8386 seem to have a need for a signal/roundabout at SR 44 and a road with 8761(375 more) needs none? 48-y
- If trip distribution causes a signal/roundabout to be recommended at Airport Road at SR 44, why is there no recommendation for a signal/roundabout at Deschutes Road and SR 44?

Using the year 2035 impacts may be required by regulation, but this implies to the general public that the traffic will gradually increase through 2035. In fact the traffic will increase to full impact rather quickly (as soon as the homes are occupied), and even before that there will be the construction traffic. No doubt the developer will try to have all homes sold as soon as possible, creating full impact as soon as possible. 48-z

School zones are created specifically for traffic, yet there is no mention of the traffic impact through 2 school zones. The Omni-Means study states traffic in the area of Foothill High School will have a "significant traffic safety impact" on this section of Deschutes Rd, but even then, no mention that there is even a school or school zone in the area to be impacted. There is also no mention of the Columbia Elementary school on Old Oregon Trail or North Cow Creek Elementary school 1/4 mile east of Deschutes and Boyle. 48-aa

I believe that this traffic study has been conducted with the intent of minimizing, as much as possible, anything that would negatively impact this project, rather than a good faith effort of studying the significant environmental impacts of this project. At this point the project puts the needs of the developer and it's 166 lots ahead of those already living in the impacted area. 48-bb

Lastly, many in Palo Cedro still remember the objections brought before the BoS and Planing Commission during the planning stages of Foothill High School. Many of the concerns that were ignored or minimized in the EIR have become reality. When viewed with the memory of that process and how the community is now impacted by school traffic, I don't believe any benefit to the community will outweigh the problems. 48-cc

It is because of the significant negative environmental impacts and negative quality of life impacts that I am profoundly opposed to the Tierra Robles project as it is currently planned.

James & Tresa Griffith
22209 Oak Tree Ln
Palo Cedro, CA 96073

Response to Letter 48 – James and Tresa Griffith

Response 48-a: The commenter requests that a PDF attached to his e-mail be included to the public comments. The commenter is responding to by the Deputy Clerk of the Board advising him that the attachment will be distributed to the Board of Supervisors. The comment is noted here, and responses to comments made in the attached PDF are shown immediately below in ***Responses 48-b*** through ***48-cc***.

Response 48-b: The commenter makes a non-specific comment regarding moving to the area for the rural community and lifestyle, states a desire to live in a rural open setting, states he is an agricultural water user, and notes that further comments are provided in the letter.

Regarding the rural community and lifestyle, the commenter is referred to ***Master Response-2.*** The analysis contained in the Draft EIR specifically evaluated the proposed project's consistency with the Shasta County *General Plan* (2004), and *Shasta County Code* Title 15 (Subdivision Regulations) and Title 17 (Zoning). This comment is introductory and includes an overview of the commenter's concerns. No further response is required and no change to the Draft EIR is required.

With respect to Bella Vista Water District's (BVWD) water supply, the commenter is referred to ***Master Response-3***, and preceding ***Responses 7-a*** through ***7-p***. This comment is introductory and includes an overview of the commenter's concerns. No further response is required.

The commenter also states that he has several comments on the Draft EIR. These comments are address below in ***Response 48-c*** through ***Response 48-cc***. No further response is required.

Response 48-c: The commenter questions the communication with the telephone and internet service providers who serve the Redding area and questions which service provider will serve the project and brings up issues related to quality of internet service.

The commenter is correct that Frontier Communication is not listed in Section 11.0, ORGANIZATIONS AND PERSONS CONSULTED, but on page 5.17-9 of Section 5.17, UTILITIES AND SERVICE SYSTEMS, Frontier Communications is discussed. Regarding inclusion of AT&T in the discussion, AT&T is discussed because as stated on page 5.17-9, AT&T provides telephone, internet, and television services to the majority of the Redding area and areas south of Boyle Drive, while Frontier Telephone provides service to Palo Cedro, Bella Vista, Millville, and areas north of Boyle Drive.

The question of internet quality, however, is not an issue for CEQA. State *CEQA Guidelines* §15358(b) state that effects analyzed under CEQA must be related to a physical change in the environment. In regard to the proposed project, the discussion focuses on the physical extension of utility lines, including telephone and cable infrastructure, which could result in a physical impact on the environment. As discussed, any extension of these lines would occur with areas already proposed to be disturbed, such as roadways and residential footprints. Therefore, the extension of utility lines or other related infrastructure would not result in additional

environmental impacts not previously disclosed. No change to the Draft EIR is required.

Response 48-d: The commenter questions the water use rates used in the Draft EIR and expresses concern that there is no room for conservation during dry years.

For a discussion related to BVWD water supplies, how water use rates were calculated, and conversion measures that would be incorporated to the proposed project, the commenter is referred to ***Master Response-3*** and preceding responses under ***Response 7-m*** and ***Response 7-n***. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 48-e: The commenter notes that BVWD's projections show a shortfall in water supply during a single dry year and that the project will take water from other intended BVWD users, thus the increase in water demand would be significant during drought years.

The commenter is correct and is restating information disclosed on page 5.17-4 in Section 5.17, UTILITITES AND SERVICE SYSTEMS, of the Draft EIR. Specifically page 5.17-28) notes, Mitigation Measure (MM) 5.17-4b requires the project applicant to identify and implement an agreement with BVWD to provide BVWD with dry-year water supplies prior to commencement of project construction. This measure ensures that actual physical development does not occur until such time as there is adequate water to serve it. The commenter is also referred to ***Master Response-3*** and preceding ***Response 7-d*** for additional discussion. No change to the Draft EIR is required.

For additional information the commenter is referred to preceding ***Response 7-m*** and ***Response 7-n***. No changes to the Draft EIR are required. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 48-f: The commenter does not comment on the adequacy of the Draft EIR but restates concerns regarding the adequacy of water supply, impacts to current users, and questions that BVWD will benefit from higher residential water costs. The commenter also restates his use as an agricultural user and highlights personal measures taken to reduce water consumption.

The commenter is referred to ***Master Response-3*** for a discussion of the BVWD water supply and ability to serve the proposed project and existing users. As discussed in ***Master Response-3***, the existing customer shortage will not be exacerbated by the proposed project. BVWD is currently working to expand water supplies and as discussed above, Mitigation Measure (MM) 5.17-4b requires the applicant to provide alternate supplies during periods of water shortage. The commenter is also is referred to preceding ***Response 7-c*** which explains in greater detail how the proposed project is expected to use similar volumes of water to (approximately 55 gallons per day per resident) as other rural residential developments in the BVWD service area. No changes to the Draft EIR are required. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 48-g: The commenter questions the accident rates and how the increase in average daily trips (ADT) will affect the accident rates and the number of accidents.

With regards to safety concerns along Boyle Road and Old Alturas Road, the commenter is referred to Section 5.16, TRAFFIC AND CIRCULATION, and for issues related to traffic and traffic safety. More specifically, in relation to the general comments related to traffic safety the commenter is referred to preceding ***Responses 14-b, 35-c, 40-a,*** and ***43-b*** which discuss increased traffic and use of intersection, collision analysis, intersection and roadway improvements, improved signage, and improvements to improve pedestrian and bicycle safety.

Response 48-h: The commenter notes that the lanes on Deschutes Road are so narrow that cars must cross a double yellow line to pass cyclists and pedestrians must walk on a narrow shoulder.

Although this comment does not question the adequacy of the Draft EIR, the commenter appears to be raising a concern about safety along the roadway. The commenter is referred to preceding ***Response 43-b*** which discusses the impacts associated with pedestrians and bicyclists along area roadways. It should be noted that page 5.16-31 in Section 5.16, TRAFFIC AND CIRCULATION, concluded that impacts to be *less than significant* with the incorporation of mitigation. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 48-i: The commenter states that the roadway segment on Old Oregon Trail from Old Alturas Road to SR-44 was not analyzed and should be analyzed given that mitigation measures are recommended at Intersections #10 and #11, this section contains 4 intersections listed in the study (Intersection #8 through Intersection #11), and the roadways segment includes an elementary school zone.

The Draft EIR analyzes roadway segments as noted in Section 5.16, TRAFFIC AND CIRCULATION. Specific to Old Oregon Trail, this roadway segment was analyzed north of Old 44 Drive (Segment #7). The "just north of Old 44 Drive" was selected for analysis because:

- The roadway geometry is representative of the entire segment of Old Oregon Trail, from SR-44 to Old Alturas Road.

- By collecting existing traffic counts and projecting future impacts at this location the analysis represents a worst-case analysis for the entire segment of Old Oregon Trail, from SR-44 to Old Alturas Road.

As shown in Table 5.16-6, EXISTING ROADWAY LEVEL OF SERVICE, Old Oregon Trail (north of Old 44 Drive) currently operates at LOS C and has 8,031 ADT. As shown in Table 5.16-9, EXISTING PLUS PROJECT ROADWAY LEVEL OF SERVICE, Old Oregon Trail (north of Old 44 Drive) would continue to operate at LOS C with 8,386 ADT. Under cumulative conditions, Old Oregon Trail would operate at LOS E with 11,195 ADT in Year 2035 with the proposed project (refer to Table 5.16-15, YEAR 2035 PLUS PROJECT TOADWAY LEVEL OF SERVICE).

Roadway segments are analyzed differently than intersections and have different criteria for LOS. Intersection LOS criteria are provided in Table 5.16-4, LEVEL OF SERVICE CRITERIA FOR INTERSECTIONS, while roadway segment LOS criteria are provided in Table 5.16-5, LEVEL OF SERVICE CRITERIA FOR ROADWAYS. Therefore, a roadway segment that operates within acceptable LOS with the introduction of project traffic may also have specific intersections that operated at unacceptable LOS and require mitigation measures. Please refer to Section 5.16, TRAFFIC AND CIRCULATION, and Appendix 15.9, TRAFFIC IMPACT STUDY, for further details regarding the thresholds and analysis of the study area roadways and intersections. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration during deliberations on the project. No further response is necessary and no change to the Draft EIR is required.

Page 5.16-3 in Section 5.16, TRAFFIC AND CIRCULATION, states that the roadway segments used for the analysis were selected in coordination with County staff and Caltrans. Contrary to what the commenter claims, the inclusion of roadway segment #7 (Old Oregon Trail (just north of Old 44 Drive) in combination with (Old Alturas Road/Old Oregon Trail (Intersection #8) and Old Oregon Trail & Old 44 Drive (Intersection #9) are sufficient to provide traffic volumes for the roadway segment.

Response 48-j: The commenter notes mitigation listed in Table 17 and comments that another mitigation project was planned and not built in 2008.

The commenter is correct that mitigation was planned and funded but not built in 2008. That project will now be constructed as part of the proposed project. This will not result in any impacts not identified in the Draft EIR, and no change to the Draft EIR is required.

Response 48-k: The commenter asks why there was no mention that the significant traffic safety impact on Deschutes Road (Boyle Road to SR-44) that would occur in a school zone.

Section 5.16, TRAFFIC AND CIRCULATION, and Appendix 15.9, TRAFFIC IMPACT STUDY, provide analysis of the proposed project on traffic and circulation. As discussed in Section 5.16.3, METHODOLOGY AND GUIDELINES, roadway segments and intersections are analyzed based on level of service. The focus is therefore on stop delay per vehicle (in seconds) for intersections and average daily trips (ADT) for roadway segments. Traffic impacts are based on the standards identified in Section 5.16.7, STANDARDS OF SIGNIFICANCE, of Section 5.16, TRAFFIC AND CIRCULATION, of the Draft EIR. This sections states:

> "In accordance with State *CEQA Guidelines*, the effects of a project are evaluated to determine whether they would result in a significant adverse impact on the environment. An EIR is required to focus on these effects and offer mitigation measures to reduce or avoid any significant impacts that are identified. The criteria used to determine the significance of impacts may vary depending on the nature of the project. According to Appendix G of the State *CEQA Guidelines*, the proposed project would have a significant impact related to traffic and circulation, if it would:

- *Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections).* Refer to Impact 5.16-1 and Impact 5.16-5 in Section 5.16.9, CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES, below.

- *Exceed, either individually or cumulatively, a level of service standard established by the County congestion management agency for designated roads or highway.* Refer to Impact 5.16-1 and Impact 5.16-5 in Section 5.16.9, CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES, below.

- *Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).* Refer to Impact 5.16-2, below.

- *Result in inadequate emergency access.* Refer to Impact 5.16-3, below.

- *Result in inadequate parking capacity.* Refer to AREAS OF NO PROJECT IMPACT, below.

- *Conflict with adopted policies, plans or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks).* Refer to Impact 5.16-4, below.

- *Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.* Refer to AREAS OF NO PROJECT IMPACT, below.

Based on these standards, the effects of the proposed project have been categorized as either a "*less than significant"* impact or a "*potentially significant"* impact. Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less than significant level through the application of mitigation, it is categorized as a "*significant and unavoidable"* impact."

Therefore, all areas are analyzed equally, whether within a school zone or outside of a school zone. This is because all drivers in California must pass the California driving test and must obey all speed limits, stop signs, signals, and rules deemed necessary for any given area.

The University of California, Berkeley, Transportation Injury Mapping System, for the five-year period from January 1, 2013 to December 31, 2017 (Year 2017 being the most recent full-year data), shows all reported vehicle crashes on the public roads in Shasta County.[13] Within the five-year period, the reported crashes within signed school zones are as follows:

Junction Middle School:

- 1 reported rear-end crash on a Saturday at 10:55 AM that did not involve pedestrians or bicycles.

Foothill High School:

- 1 reported rear-end crash on a Tuesday at 3:30 PM that did not involve pedestrians or bicycles.

North Cow Creek Elementary:

- No reported crashes.

Redding Christian School & Chrysalis Charter School (there is not a signed school zone):

- 1 reported head-on crash on a Wednesday at 5:30 PM that did not involve pedestrians or bicycles.

Bella Vista Elementary School:

- No reported crashes.

Columbia Elementary School:

- 1 reported broad-side crash on Wednesday at 1:35 PM that did not involve pedestrians or bicycles.
- 1 reported run-off-the-road crash on a Wednesday at 9:04 PM that did not involve pedestrians or bicycles.

A review of the five-year crash data indicates that there is not an unusual or unique safety risk in the school zones. Impacts within roadway segments within school zones are therefore considered *less than significant*.

The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration during deliberations on the project. No further response is necessary and no change to the Draft EIR is required.

Response 48-l: The commenter restates language from the Tierra Robles Traffic Impact Study in reference to intersections #10 and #13 and makes comment regarding mitigation for another project was not completed.

[13] https://tims.berkeley.edu/

The commenter is referred to preceding ***Response 4-b*** which provides a description of the proposed mitigation for the listed intersections***.***

The Draft EIR properly discusses impacts and proposes mitigation to reduce impacts to the listed intersection for the listed intersections. Mitigation Measure (MM) 5.16-1 on page 5.16-26 in Section 5.16, TRAFFIC AND CIRCULATION, states:

> "In accordance with the City of Redding *Traffic Impact Analysis Guidelines* (January 2009), the project applicant shall construct the following improvements in the corporate limits of the City of Redding prior to issuance of a building permit that would allow construction of the first residence:
>
> - *Airport Road* & *SR-44 WB Ramps (Intersection #10)*. Construct traffic signal or a single/multi-lane roundabout. Traffic signal construction at this location shall also be coordinated with existing traffic signals at *Old Oregon Trail & Old 44 Drive (Intersection #9)* and *Airport Road & SR-44 EB Ramps (Intersection #11)*."

Therefore, this improvement will be constructed prior to the issuance of the first building permit.

Regarding impacts to Boyle Road and Deschutes Road (Intersection #13) the applicant would be required to pay a pro-rated cost sharing for the all-way-stop-controlled intersection. The timing and implementation of the improvement will be determined by the County. This is beyond the control of the applicant; however, payment of the pro-rated cost constitutes full mitigation for the projects contribution to traffic conditions, and therefore, the impact was properly found to be *less than significant*.

This comment is part of the record and will be provided to the Planning Commission and Board of Supervisors for consideration during deliberations on the project. No further response is necessary and no change to the Draft EIR is required.

Response 48-m: The commenter restates the text of Mitigation Measure (MM) 5.16-1 and questions why the County has not yet installed the proposed signage if it would lower the accident rate.

The question posed by the commenter of why has the County not already installed the signs is beyond the scope of this Draft EIR. For the purposes of this Draft EIR the lack of the signs is being treated as the baseline condition which is defined as the existing condition at the time the Notice of Preparation (NOP) is published. Accordingly, the placement of signage is proposed as part of the project as a means to improve safety. No change to the Draft EIR is required.

Response 48-n: The commenter questions the traffic counts shown for the intersection of Old Oregon Trail and Old Alturas Road (Intersection #8). The commenter states that the existing and existing plus project AM and PM traffic numbers are the same.

It is true that the modeling includes the same numbers for the northbound and southbound through lanes. It is also true that the trips are also the same numbers for southbound right turn, east bound left turn, east bound right turn and northbound left turn in both described conditions for AM – leaving six turning movements at Old Oregon Trail and Old Alturas Road (Intersection #8) with differing numbers. In the PM the same trip numbers are used for northbound left turn, southbound left turn, the southbound through lane and eastbound left turn – leaving eight turning movements at Intersection #8 with differing trip numbers. It is not a mistake or error to have duplicate trip assignments for various modeling scenarios.

Section 5.16, TRAFFIC AND CIRCULATION, and Appendix 15.9, TRAFFIC IMPACT STUDY, of the draft EIR provide analysis of the proposed project on traffic and circulation. As discussed in Section 5.16.5, TRIP GENERATION AND DISTRIBUTION, project trip generation was estimated utilizing trip generation rates contained in the Institute of Transportation Engineers (ITE) Publication *Trip Generation Manual (Ninth Edition)*. Single Family Detached Housing (ITE Code 210) has been used to estimate the trip generation for the proposed project. Table 5.16-8, PROJECT TRIP GENERATION, on page 5.16-15 of the Draft EIR, provides a summary of the land use and quantities (i.e., units) for the proposed project, along with corresponding ITE land use codes from which trip generation characteristics were established and analyzed. As shown in Table 5.16-8, it is estimated that the proposed project would generate approximately 1,774 new daily trips, with 135 vehicle trips generated during the AM peak hour and 175 vehicle trips generated during the PM peak hour period.

As discussed on page 5.16-15 of the Draft EIR, the directional trip distribution and assignment of project-generated trips were estimated based on an understanding of existing and projected future traffic flows and travel patterns within the vicinity of the proposed project site, location of local and regional housing and employment/commercial centers in relation to the proposed project site, and supplemented by the use of the Shasta County Regional Travel Demand Forecast model. The directional trip distribution for the proposed project is graphically depicted in Figure 5.16-3, PROJECT TRIP DISTRIBUTION.

As discussed in Section 5.16.3, METHODOLOGY AND GUIDELINES, intersection LOS is calculated for all control types using the *Synchro 8* software by Trafficware, implementing the methods documented in the HCM 2010. For signalized intersections and all-way-stop-controlled (AWSC) intersections, the intersection delays and LOS are average values for all intersection movements. For two-way-stop-controlled (TWSC) intersections, the intersection delay and LOS is representative of those for the worst-case movement.

Based on the above trip generation models and trip distribution models, the traffic numbers at the intersection of Old Alturas Road and Old Oregon Trail Road differ. While some movements at the intersection remain the same between existing and existing plus project scenarios, other movements differ. The traffic volumes on Old Alturas Road increase in the AM peak hour heading away from the project site, while they increase in the PM peak hour heading toward the project site on Old Alturas Road. Similarly, traffic movements from Old Oregon Trail onto Old Alturas Road head towards the project site increase as well. The traffic volumes that the commenter

refers to are the through movements on Old Oregon Trail, and thus are not affected by the proposed project. The comment is part of the record and will be provided to the Planning Commission and Board of Supervisors for consideration during deliberations on the project. No further response is necessary and no change to the Draft EIR is required.

Response 48-o: The commenter restates some of the text the Tierra Robles Traffic Impact Study, May 2015, supplemental Technical Memorandum August 17, 2017, and questions the use of an all way stop. The commenter suggests that the way to increase the LOS on Boyle Road is to reduce the LOS on Deschutes. In addition, the commenter states that safety impacts would result from traffic having to slow from travelling 50 plus miles per hour to a complete stop at the stop sign.

The commenter is correct that proposed mitigation includes installation of an all way stop. Page 5.16-38, lists Mitigation Measure (MM) 5.16-4 which reads, "Boyle Road & Deschutes Road (Intersection #13). Prior to recordation of a final map or issuance of a building permit (whichever occurs first), the project applicant shall pay the pro-rated cost share representing 11 percent of the cost of upgrading the existing two-way-stop-controlled intersection to all-way-stop-controlled intersection. The fee shall be established based on an engineer's cost estimate of the improvements prepared by the project applicant and approved by the Shasta County Public Works Department."

Because the proposed project would be required to pay eleven percent of the cost of the all way stop control, under *Level of Significance After Mitigation*, page 5.16-38 further states, "The improvements identified for the intersections of Old Alturas Road & Old Oregon Trail (Intersection #8) and Boyle Road & Deschutes Road (Intersection #13) are not currently part of any current Shasta County improvement plan or fee program. As a result, full implementation as described in Mitigation Measure (MM) 5.16-3 and Mitigation Measure (MM) 5.16-4 cannot be assured by the project applicant. This is considered to be a cumulatively considerable and *significant and unavoidable* impact.

The Shasta County Department of Public Works operates a county-wide traffic impact fee program based on residential units or non-residential building square footage. The proposed project may contribute to this program as described in Mitigation Measure (MM) 5.16-3 and Mitigation Measure (MM) 5.16-4, should Shasta County update the fee program to include the Old Alturas Road & Old Oregon Trail (Intersection #8) and Boyle Road & Deschutes Road (Intersection #13) intersections. The payment of applicable fair-share costs towards a programmed improvement would result in a cumulatively *less than significant* impact at each intersection.

With regard to safety of a stop-controlled intersection, placement of STOP control at intersections is regulated in California by the *California Manual on Uniform Traffic Control Devices, 2014 Edition, Revision 3, March 9, 2018* (MUTCD). The MUTCD specifies the standards and guidelines, followed by Shasta County, for intersection control and warning. Advance warning methods that will be included in the engineering design of the STOP control to provide traffic safety. No change to the Draft EIR is required.

Response 48-p: The commenter restates information regarding vehicle trips. The commenter questions why Mitigation Measure (MM) 5.16-3, which requires a pro-rated 13% share for a single/multi-lane roundabout at Old Alturas Road & Old Oregon Trail (Intersection #8), while the intersection of SR-44 and Deschutes Road with 8,761 ADT (with project) does not.

Table 5.16-6, EXISTING ROADWAY LEVEL OF SERVICE, in Section 5.16, TRAFFIC AND CIRCULATION, shows that the ADT on Old Oregon Trail (north of Old 44 Drive) would be 8,031, and in Table 5.16-9, EXISTING PLUS PROJECT ROADWAY LEVEL OF SERVICE, shows that the ADT on Old Oregon Trail (north of Old 44 Drive) would have an ADT (with project) of 8,386. Regarding Deschutes Road (north of Old 44 Drive), Table 5.16-6 also shows an existing ADT of 8,495, and Table 5.16-9 shows that Deschutes Road (north of Old 44 Drive) would have an ADT (with project) of 8,761.

Page 5.16-28 in Section 5.16, TRAFFIC AND CIRCULATION, recognizes the 38% higher than the statewide average collision rate on Deschutes Road (Boyle Road to SR-44). This page also recognizes that approximately 85% of the collisions occurred during daylight conditions and 56% were rear-end collisions. South of Boyle Road, it is estimated that 15% of the project traffic will use this section of roadway which will increase the ADT by 5% in both the *Existing Plus Project* and *Year 2035 Plus Project* conditions. Immediately north of SR-44, it is estimated that 7% of the project traffic will use this section of roadway which will increase the ADT by 1% in both the *Existing Plus Project* and *Year 2035 Plus Project* conditions. The installation of intersection warning signs in accordance with Mitigation Measure (MM) 5.16-2, at various locations along Deschutes Road between Boyle Road and SR-44, would serve to notify drivers of upcoming driveways. Impacts for *Existing*, *Existing Plus Project,* and *Year 2035 Plus Project* conditions were concluded to be reduced to *less than significant* levels.

The commenter asserts that the increase in average daily traffic (ADT) on Old Oregon Trail, between SR-44 and Old Alturas Road, leads to mitigation of a traffic signal or roundabout at the Old Alturas Road & Old Oregon Trail intersection (Intersection #8). The assertion is not accurate. The traffic impact analysis methods presented in Appendix 15.9, TRAFFIC IMPACT STUDY, of the Draft EIR describes different LOS measurements for roadway segments and intersections. The project does not have any significant impacts on roadways due to LOS. The significant impact at the Old Alturas Road & Old Oregon Trail intersection (Intersection #8) is due to delay increases that are specific to the intersection geometry and land configurations.

The commenter correctly asserts that there will be an increase in ADT on Deschutes Road, between SR-44 and Boyle Road. The commenter correctly asserts that Mitigation Measure (MM) 5.16-2 requires installation of intersection warning signs. In this case, the intersection warning signs are a required mitigation measure due to the existing vehicle crash history and patterns.

The commenter correctly asserts that Mitigation Measure (MM) 5.16-3 identifies the need for a signal or a multi-lane roundabout at the Old Alturas Road & Old Oregon Trail intersection (Intersection #8) and that Mitigation Measure (MM) 5.16-4 identifies the need for an all-way STOP at the Boyle Road & Deschutes Road intersection

(Intersection #13). An acceptable LOS can be achieved by upgrading the existing all-way STOP to a signal or multi-lane roundabout at the Old Alturas Road & Old Oregon Trail intersection (Intersection #8). An acceptable LOS can be achieved by upgrading the existing two-way STOP to an all-way STOP at the Boyle Road & Deschutes Road intersection (Intersection #13). No change to the Draft EIR is required.

Response 48-q The commenter states that the is currently no plan to implement any mitigation measures at Old Alturas Road and Old Oregon Trail (Intersection #8) and Boyle Road and Deschutes Road (Intersection #13).

The commenter is correct that no mitigation is proposed for Deschutes Road and Old Alturas Boulevard (Intersection #2). As shown on Table 5.16-10, EXISTING PLUS PROJECT INTERSECTION LEVEL OF SERVICE, the intersection would operate at LOS C during AM Peak hours, and LOS B during PM Peak hours. In both cases the warrant was not met for needed traffic improvements; refer to Section 5.16, TRAFFIC AND CIRCULATION, and Appendix 15.9, TRAFFIC IMPACT STUDY, of the Draft EIR. The comment is part of the record and will be provided to the Planning Commission and Board of Supervisors for consideration during deliberations on the project. No further response is necessary and no change to the Draft EIR is required.

Response 48-r: The commenter recommends mitigation for telephone and internet services resulting in the construction of telephone and internet facilities adequate for existing and existing plus project demand.

The commenter is referred to ***Response 48-c***, above. The comment is part of the record and will be provided to the Planning Commission and Board of Supervisors for consideration during deliberations on the project. No further response is necessary and no change to the Draft EIR is required.

Response 48-s: The commenter questions that how water demand can be mitigated.

The commenter is referred to ***Master Response-3,*** above for a discussion of the BVWD water supply and ability to serve the proposed project and existing users. The comment is part of the record and will be provided to the Planning Commission and Board of Supervisors for consideration during deliberations on the project. No further response is necessary and no change to the Draft EIR is required.

Response 48-t: The commenter recommends mitigation for traffic, shoulder width, intersection lane movements, pedestrian facilities, and intersection controls. The commenter asserts that the following roadway improvements should be the responsibility of the applicant:

- Construction of roadway shoulders on Boyle Road, Old Alturas Road and Deschutes Road.
- Construction of left-turn lanes along Deschutes Road, between Berkeley Road and Boyle Road.
- Construction of sidewalks or pathways along Deschutes Road, between Foothill High School and Boyle Road.

- Installation of a traffic signal or roundabout at the Deschutes Road & SR-44 westbound ramps intersection.

Each of the roadway segments identified by the commenter will operate at the same LOS category (A - F) with or without the project. There is not a significant impact that warrants construction of left-turn lanes along Deschutes Road. The projected increase of 116 vehicles per day, on Deschutes Road, as a result of the project, does not create a significant impact that warrants sidewalks or pathways. There is not a significant impact at the intersection of Deschutes Road & SR-44 westbound ramps as a result of the project.

The commenter is also referred to ***Responses 48-g*** through ***48-q***, above. The comment is part of the record and will be provided to the Planning Commission and Board of Supervisors for consideration during deliberations on the project. No further response is necessary and no change to the Draft EIR is required.

Response 48-u: The commenter paraphrases previous questions related to telephone and internet service, water conservation, dry-year concerns related to water use, and school zones.

The commenter is referred to ***Response 48-c*** related to telephone and internet, above ***Responses 48-d, 48-e,*** and ***48-f*** related to water and above ***Response 48-k*** related to schools**.** The comment is part of the record and will be provided to the Planning Commission and Board of Supervisors for consideration during deliberations on the project. No further response is necessary and no change to the Draft EIR is required.

Response 48-v: The commenter questions the traffic study having accounted for the schools in the area.

The schools in the area were accounted for and addressed in numerous locations within the Draft EIR. Specifically related to traffic and circulation, page 5.16-7 and page 5.16-8 in Section 5.16, TRAFFIC AND CIRCULATION, address the data collection and recognizes the schools in the area stating that they were in session but no known special events were occurring during the collection period. Page 5.16-13 of the Draft EIR addressed traffic signal warrants and states that the signal warrant criteria are based upon several factors, including the volume of vehicular and pedestrian traffic, frequency of accidents, and location of school areas. Page 5.16-30 of the Draft EIR, under Impact 5.16-4 addresses pedestrian and bicycle facilities and recognizes that schools are more than 2 miles from the project site. Impacts to pedestrians and bicycle were found to be *less than significant*. No change to the Draft EIR is required.

Response 48-w: The commenter questions if the County will install the listed traffic mitigation and asks when the mitigation will be installed.

Should the proposed project be approved, the County will ensure that the applicant implements all listed mitigation. State *CEQA Guidelines* §15126.4(2) states, "Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. In the case of the adoption of a

plan, policy, regulations, or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design."

Regarding the commenter's question of the timing of mitigation, as provided in Mitigation Measure (MM) 5.16-1, Airport Road & SR-44 WB Ramps would be implemented, "prior to the issuance of a building permit that would allow construction of the first residence." Mitigation Measure (MM) 5.16-2 requires Caltrans standard W2 intersection warning signs to be installed, "prior to issuance of a building permit that would allow construction of the first residence. In addition, Mitigation Measure (MM) 5.16-3 and Mitigation Measure (MM) 5.16-4 require pro-rated cost sharing to be implemented, "prior to recordation of a final map or issuance of a building permit (whichever comes first)." No change to the Draft EIR is required.

Response 48-x: The commenter inquires how a four-way stop at Deschutes Road and Boyle Road would impact traffic on Deschutes Road.

Please refer to prior responses under ***Response 17-o*** and ***Response 37-c*** regarding impacts to Deschutes Road and the mitigation involving a four-way stop. The comment is part of the record and will be provided to the Planning Commission and Board of Supervisors for consideration during deliberations on the project. No further response is necessary and no change to the Draft EIR is required.

Response 48-y: The commenter questions why Old Oregon Trail from Old Alturas Road to SR-44 is not mentioned in the traffic study. The commenter asserts that the data regarding the intersection of Old Alturas Road and Old Oregon Trail (Intersection #8) is flawed. The commenter restates questions regarding proposed mitigation for signals/roundabouts at certain intersections but not at others.

The commenter is referred to preceding responses under ***Response 43-b***, ***48-i, 48-o,*** and ***48-p***. The comment is part of the record and will be provided to the Planning Commission and Board of Supervisors for consideration during deliberations on the project. No further response is necessary and no change to the Draft EIR is required.

Response 48-z: The commenter states that using the Year 2035 impacts may be required by regulations, but this implies to the general public that the traffic will gradually increase through Year 2035.

As discussed in Section 5.16, TRAFFIC AND CIRCULATION, and in Appendix 15.9, TRAFFIC IMPACT STUDY, the traffic impacts are looked at under existing and future conditions. The first, existing conditions, is analyzed with and without the project to determine the proposed project's impact on existing traffic facilities. The second, Year 2035, is analyzed with and without the project to determine the cumulative impacts of the proposed project. Therefore, the proposed project's traffic impacts are analyzed for conditions when the project is fully occupied and again in Year 2035, using Shasta County's growth rates and assumptions from the Shasta County *General Plan*. The comment is part of the record and will be provided to the Planning Commission and Board of Supervisors for consideration during deliberations on the project. No further response is necessary and no change to the Draft EIR is required.

Response 48-aa: The commenter restates concerns regarding impacts associated with traffic in school zones and points out that there is no mention of the Columbia Elementary School or the North Cow Creek Elementary School.

The commenter is referred to ***Response 48-k,*** above. The comment is part of the record and will be provided to the Planning Commission and Board of Supervisors for consideration during deliberations on the project. No further response is necessary and no change to the Draft EIR is required.

Response 48-bb: The commenter opines the traffic analysis prepared for the proposed project was conducted to minimize impacts and was not prepared based on a good-faith effort to study the significant environmental effects of the project. It is important to note that the commenter provides no substantial evidence to support this opinion.

Project trip generation was estimated utilizing trip generation rates contained in the Institute of Transportation Engineers (ITE) Publication *Trip Generation Manual (Ninth Edition)*. Single Family Detached Housing (10.09 daily trips per unit) and Apartment (6.65 daily trips per unit) has been used to estimate the trip generation for the proposed project. The Apartment category was utilized in the analysis to capture daily trips associated with up to 15 accessory dwelling units.

The commenter is referred to page 5.16-1 in Section 5.16, TRAFFIC AND CIRCULATION, which lists the sources used to analyze the potential environmental impacts related to traffic and circulation, including: 1) Caltrans. *Guide for the Preparation of Traffic Impact Studies.* December 2002; 2) City of Redding. *Bikeway Action Plan 2010-2015*. April 2010; 3) City of Redding. *Redding General Plan 2000 – 2020*. October 2000; 4) City of Redding. *Traffic Impact Assessment Guidelines.* January 2009; 5) Shasta County. *2030 Shasta County Travel Demand Model (SCTDM)*; 6) Shasta County. *Shasta County 2010 Bicycle Transportation Plan*. 2010; 7) Shasta County. *Shasta County General Plan*. September 2004; and 8) Shasta County. *Regional Transportation Plan*. No change to the Draft EIR is required.

Response 48-cc: The commenter raises concerns about a previous EIR and claims concerns were ignored. The commenter also reiterates opposition to the proposed project.

This comment does not question the adequacy of the Draft EIR. The comment will be referred to decision-makers, in this case the Planning Commission and Shasta County Board of Supervisors, for further consideration as part of the deliberative process. No change to the Draft EIR is required.

Letter 49 – Philip G. Marquis (December 11, 2017)

December 11, 2017

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

Dear Mr. Hector:

I have previously sent a letter explaining my opposition to the Tierra Robles Subdivision and have some additional comments.

Because the proposed Subdivision would possibly unfavorably impact the now insufficient water pressure within the Welsh pumping system to existing customers, I ask:

Before approving this development, Bella Vista Water District at the expense of the Developer must conduct a Hydraulic test of the Welsh pumping system to assess the current pressures and available flows within the system and assess accurately the impact of building this subdivision on existing customers. All data resulting from the hydraulic tests must be made publically available by Bella Vista Water District to their customers prior to approval of the Subdivision. 49-a

Any deficiencies must be addressed and corrected prior to approval of this project. This hydraulic test was not conducted as part of the Draft EIR and is not included in the data presented.

Regarding Traffic:

The traffic study is currently flawed as it was conducted in May 2013 and does not reflect current roadway flows and conditions. The traffic study does not mitigate the dangerous intersection posed by the new road leading to the Tierra Robles Subdivision, 7 Lakes Road and Old Alturas Road in both directions which has a sharp curve and limited visibility. The traffic study must be updated and address the current conditions. Turn lanes must be added to ensure safe turns into and out of the development at the expense of the Developer. This must be made a condition of the Subdivision approval. 49-b

Please add these comments to my previous submission dated 12-2-2017.

Thank You

Sincerely,

Philip G. Marquis
11707 Homestead Lane
Redding, CA. 96003

Response to Letter 49 – Philip G. Marquis

Response 49-a: The commenter states that the Bella Vista Water District (BVWD), at the expense of the developer, must conduct a hydraulic test of the Welsh pumping system and make all results available to customers prior to approval of the subdivision. The commenter notes that no such hydraulic test was conducted as part of the Draft EIR and is not included to the data presented.

The commenter is correct that a hydraulic test was not conducted as part of the environmental review for this Draft EIR. State *CEQA Guidelines* do not require the preparation of a hydraulic test. The commenter is referred to preceding ***Response 17-g*** related to water pressure. No changes to the Draft EIR are required. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 49-b: The commenter expresses concern that the Traffic Study does not reflect current roadway flows and conditions, does not mitigate for the dangerous intersection that would occur at the proposed north entrance and Seven Lakes Road and Old Alturas Road. The commenter requests the addition of turn lanes to ensure safe turns into and out of the project site and requests that this be a condition of approval.

The May 2015 Traffic Impact Study, contained in Appendix 15.9, used 2013 data for all study intersections and 2015 data for all roadways. County staff and GHD staff reviewed the data and analysis in October 2018 and determined that there was one intersection (Deschutes Road & Cedro Lane (Intersection #15)) that had the potential of a previously not identified significant impact to the LOS due to traffic growth since the traffic counts were collected. GHD used May 24, 2017 traffic counts at the Deschutes Road & Cedro Lane intersection (Intersection #15) and prepared the following:

- Traffic Impact Analysis Update for Intersection No. 15: Deschutes Road & Cedro Lane, GHD, November 20, 2018.

The November 20, 2018 traffic analysis for Intersection No. 15 determined that:

- There would not be a significant impact under existing plus project conditions.
- There would be a significant impact, in both the AM and PM peak hours, under the *Year 2035 Plus Project* conditions.

As noted in the ERRATA, Shasta County and the project applicant will enter into a development Developer agreement for funding of intersection improvements at Deschutes Road & Cedro Lane (Intersection #15). The agreement includes converting the existing all-way stop intersection at Cedro Lane and Deschutes Road to a signalized intersection with ADA compliant ramps and crosswalks.

Section 5.16, TRAFFIC AND CIRCULATION, of the Draft EIR and Appendix 15.9, TRAFFIC IMPACT STUDY, of the Draft EIR, analyze the Old Alturas Road and Seven Lakes Road intersection (Intersection #3) and Boyle Road & Project Driveway A (Intersection # 18). As shown in Table 5.16-10, EXISTING PLUS PROJECT INTERSECTION LEVEL OF SERVICE,

these intersections are two-way stop controlled intersections and will operate at LOS A or LOS B in the AM and PM directions. The addition of turn-lanes at these intersections is not warranted. No change to the Draft EIR is required.

Letter 50 – Gregory Marshall (December 13, 2017)

Kimberly Hunter

From: Resource Management
Sent: Wednesday, December 13, 2017 2:35 PM
To: Kimberly Hunter
Subject: FW: Boyle Road Development

Tracie Huff
Administrative Secretary I
Shasta County Resource Management
1855 Placer Street
Redding CA 96001
(530) 225-5532 Phone
(530) 245-6468 Fax

From: Gregory Marshall [mailto:49deneb@gmail.com]
Sent: Tuesday, December 12, 2017 4:09 PM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: Boyle Road Development

To Whom It May Concern:

I am a former resident of the area where this developer hopes to build a subdivision. As a former resident, I have no immediate stake. BUT: 50-a

This is the most ridiculously bad idea to hit the area since the Jones Fire. If you were to take a poll of all residents within 2 miles of this site, 99 percent of them would oppose it, and a significant number would start reaching for their guns. People buy property in this area to ESCAPE the subdivision world. Boyle Road will have to be turned into a 4-lane thoroughfare (or else there will be 20-car backups at the stop signs). The general traffic level will make Boyle Road look like Dana Drive. And the disruption and traffic interference during the construction period – 5 years, more? – will be insane. 50-b

This entire idea is insane. Does the county government really have to cater to the money grubbers behind this project? If you would like, I will drive around the Redding area for an afternoon and come back with about 10 sites that would be much more suitable for a subdivision. 50-c

PLEASE protect the Boyle Road area and residents from this assault.

Gregory Marshall
1576 Santa Fe Avenue
Redding 96003

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Response to Letter 50 – Gregory Marshall

Response 50-a: The commenter states that he is a former resident of the area and provides subsequent comments about the proposed project. The commenter does not question the adequacy of the Draft EIR and does not the raise a substantive question about the proposed projects ultimate appropriateness for the site, and does not directly raise an environmental issue. The comment will be referred to decision-makers, in this case the Planning Commission and Board of Supervisors, for further consideration as part of the deliberative process. No change to the Draft EIR is required.

Response 50-b: The commenter is opposed to the proposed project. The commenter states Boyle Road will need to be widened and claims traffic during construction will be "insane." Although the commenter does not question the adequacy of the Draft EIR and does not raise a substantive question about the validity of the environmental analysis contained in the Draft EIR, the commenter is provided the following response:

The analysis contained in the Draft EIR specifically evaluated the proposed project's consistency with the Shasta County *General Plan* (2004), and *Shasta County Code* Title 15 (Subdivision Regulations) and Title 17 (Zoning). The commenter is referred to Table 5.10-2, CONSISTENCY ANALYSIS WITH SHASTA COUNTY GENERAL PLAN OBJECTIVES AND POLICIES FOR LAND USE AND PLANNING, on page 5.10-15 through 5.10-21 in Section 5.10, LAND USE AND PLANNING. The analysis found that the proposed project was consistent with the applicable *General Plan* Objectives and Policies. The commenter also is referred to ***Master Response-2*** for additional information regarding the project's proposed zoning and density. No change to the Draft EIR is required.

The proposed project does not propose the widening of Boyle Road to a four-lane thoroughfare. The commenter is referred to page 5.16-34, Table 5.16-15, YEAR 2035 PLUS PROJECT ROADWAY LEVEL OF SERVICE, in Section 5.16, TRAFFIC AND CIRCULATION. Boyle Road (west of Deschutes Road) is projected to have 1,847 average daily trips (ADT) and operated at Level of Service (LOS) A. No change to the Draft EIR is required.

Response 50-c The commenter questions the County catering to the money grubbers and offers to find a better site for the proposed project**.**

The commenter does not question the adequacy of the Draft EIR and does not the raise a substantive question or concern regarding a physical environmental impact associated with the proposed project. In addition, page 7-3 through 7-4 in Section 7.0, ALTERNATIVES TO THE PROPOSED PROJECT, of the Draft EIR, evaluates the potential use of an alternative site. As noted, the key question and first step in the decision whether to include in the Draft EIR an analysis of alternative sites is whether any of the significant impacts of the project would be avoided or substantially lessened by relocating the project. Only locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR (State *CEQA Guidelines* §15126.6[f][2][A]).

For additional discussion regarding alternatives, the commenter is referred to ***Master Response-2*** and preceding ***Response 44-a*** and ***Response 45-a***. This comment will be referred to decision-makers, in this case the Planning Commission and Board of Supervisors, for further consideration as part of the deliberative process. No change to the Draft EIR is required.

Letter 51 – Scott Grant (December 14, 2017)

Kent Hector, Senior Planner
Shasta Country Department of Resource Management, Planning Division
1855 Placer Street
Redding, CA 96001

December 14, 2014

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SHASTA COUNTY
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DEPT OF RESOURCE MGMT
PLANNING D

Dear Kent Hector,

Thank you for receiving responses and questions regarding the proposed Tierra Robles Planned Development. Below are our substantive concerns: 51-a

Increases in housing density are almost always associated with increased crime. We chose to live in an area where crime rates are very low to primarily protect our families and secondarily to protect our property. Even if the county hired an extra deputy to strictly patrol the new development, assuming the increased property tax revenue could handle that expenditure, the deputy will nevertheless be frequently called to other higher priority crimes or to backup other law enforcement officers. 51-b

We chose to live in an area that matched our aesthetic desires – 5 acre parcels with homes spread out and exactly opposite the crowded nature of city living. 51-c

We live in an area where drought is relatively common and water, while plentiful, is allocated toward state-wide needs. If water allotments in drought years are already significantly curtailed, how will the limited Bella Vista Water District resources be able to handle the drought scenario we just experienced while trying to service 166 additional homes? 51-d

While we innately desire the owner of this property to be able to develop their investment, and we recognize that if it is well done, it can add to the value of the surrounding community, we are hesitant. It cannot be emphasized enough that the potential increases in crime are our single greatest concern. A possible resolution to ameliorate the risk of increased crime may be to keep the cost of each new home at or above the average of the homes in the surrounding community. Without research, we would estimate that cost to be above $450,000. Another possible resolution to the loss of the aesthetic qualities of country living may be relieved if the few parcels along Boyle lane maintain their 5 acre parcel status. 51-e

If the requested rezoning is based solely on greed in any form, then this development cannot be accomplished amicably. However, if the development proceeds at a pace appropriate to consumer demand, if agreements between the developer and the county maintain square footage relative to acreage size that keeps the total cost of each new home above the community average, and if the limited water supply needs are resolved, then I would encourage the development of this property. 51-f

Thank you for taking the time to consider the thoughts and concerns on my neighbors and myself. 51-g

Respectfully submitted,

Scott Grant
10349 Maddelein Lane
Palo Cedro, CA 96073

Response to Letter 51 – Scott Grant

Response 51-a: The commenter thanks the County for receiving his comments and indicates other comments further below in his letter.

No change to the Draft EIR is required. Responses to the commenter's concerns are provided below in ***Response 51-b*** through ***Response 51-g***. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 51-b: The commenter speculates that the increased housing densities will increase crime and alludes that law enforcement services will not be adequate.

The commenter is referred to Section 5.13, PUBLIC SERVICES AND FISCAL IMPACTS. Page 5.13-13 of the Draft EIR states that the proposed project would bring additional annual revenue from local property and sales taxes that would offset demand for law enforcement services by funding increases in personnel, training and equipment. In addition, payment of development impact fees ($789 per single-family unit) which are intended to provide the means which allow the sheriff to maintain the current level of service by offsetting costs to hire new law enforcement personnel. The Draft EIR concludes that impacts to law enforcement services would be *less than significant*. No change to the Draft EIR is required.

Response 51-c: The commenter states they chose to live on 5-acre parcels, which is the opposite of city living.

This comment does not question the adequacy of the Draft EIR. The commenter, however, is referred to Section 5.1, AESTHETICS AND VISUAL RESOURCES, and ***Master Response-2*** for a discussion of proposed housing densities. No changes to the Draft EIR are required. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 51-d: The commenter raises concerns regarding Bella Vista Water District's (BVWD) ability to supply water to the proposed project.

The commenter is referred to ***Master Response-3***. No changes to the Draft EIR are required. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 51-e: The commenter reiterates concerns about increases in crime, and appears to allude to the fact that more expensive homes would reduce the potential to induce crime within the areas. The commenter also proposes that the parcels adjacent to Boyle Road be slated for 5-acre parcels to reduce the loss of aesthetic value.

The commenter is referred to ***Response 51-b***, above related to the provision of law enforcements services, and fees that are intended to provide the means which allow the sheriff to maintain the current level of service.

Related to the comment about maintain home prices greater than $450,000, this is not an environmental issue required for evaluation in a CEQA document. Lastly, related to densities and aesthetics, the commenter is referred to ***Master Responses-2***. No changes to the Draft EIR are required. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

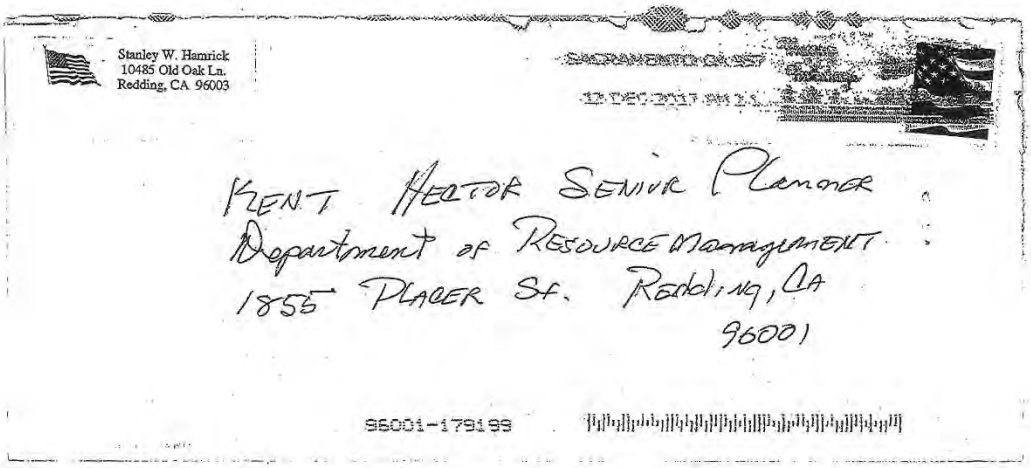
Response 51-f: The commenter states that if the development proceeds at a pace commensurate with consumer demand, maintains high enough property values, residential square footage relative to acreage size, and ensures water supply, he could support the project.

The comment will be referred to decision-makers, in this case the Planning Commission and Board of Supervisors, for further consideration as part of the deliberative process. No change to the Draft EIR is required.

Response 51-g: The commenter expresses thanks for considering his thoughts and those of his neighbors.

The comment will be referred to decision-makers, in this case the Planning Commission and Board of Supervisors, for further consideration as part of the deliberative process. No change to the Draft EIR is required.

Letter 52 – Stanley W. Hamrick (December 15, 2017)


Stanley W. Hamrick
10485 Old Oak Ln.
Redding, CA 96003

KENT HECTOR SENIOR PLANNER
Department of RESOURCE MANAGEMENT
1855 PLACER ST. REDDING, CA
96001

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Neighbors worried about subdivision east of Redding

Damon Arthur, Record Searchlight Published 4:31 p.m. PT Dec. 11, 2017

52-a

(Photo: Damon Arthur/Record Searchlight)

With a 166-home subdivision planned for her semi-rural neighborhood east of Redding, Virginia Siemens is not happy with what the future holds for the area.

While the developer says neighbors in the area will scarcely notice the new homes going in, Siemens isn't buying it.

"You get that many families out there, then they're going to build more stores or something to accommodate them. So it's just the wider roads, more stores, then we're just incorporated into Redding," Siemens said.

Siemens isn't the only resident concerned about more traffic on roads in the area, about 5 miles east of Redding, off Boyle and Old Alturas roads.

Britt Baker, who lives along Old Alturas Road, said over the past 16 years she has watched the number of vehicles whiz by her house steadily increase.

"If you increase that by a whole housing development you're going to have just one steady stream, and everyone speeds around here anyways so it's going to be really dangerous too," Baker said.

Shasta County planning officials are taking public comment on an environmental impact report that analyzes how the proposal would affect traffic in the area. The report also looks at the effects of water use, sewage and sanitation, wildlife, air quality, noise and other issues.

Comments on the report can be sent to Kent Hector, senior planner, Shasta County Department of Resource Management, Planning Division, 1855 Placer St, Redding, CA 96001.

Comments are accepted until Dec. 29.

Richard Simon, the county's resource management director, said the Tierra Robles development is the largest proposed development that has been submitted to the county in several years.

"It's pretty unusual for the unincorporated area of the county," Simon said. "It's a pretty good-sized project anywhere."

The developer, Geringer Capital of Beverly Hills, wants to change the zoning to allow homes to be built on lots ranging in size from 1.38 acres to 6.81 acres on 715 acres of land west of Deschutes Road, south and east of Old Alturas Road and north of Boyle Road.

Response to Letter 52 – Stanley W. Hamrick

Response 52-a: The commenter photo copied an article entitled "Neighbors worried about subdivision east of Redding," dated December 11, 2017. Across the heading of the article, the commenter hand wrote, "You must be kidding?" and "No."

The commenter does not question the adequacy of the Draft EIR and does not the raise a substantive question regarding an environmental issue. The comment and article will be referred to decision-makers, in this case the Planning Commission and Board of Supervisors, for further consideration as part of the deliberative process. No change to the Draft EIR is required.

Letter 53 – Sue Harbert (December 17, 2017)

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December 17, 2017

Kent Hector Senior Planner

Shasta County Department of Resource Management

Re: Tierra Robles Development

ZONE AMENDMENT

This property is currently zoned for agricultural land and agricultural operations. If the land zoning is change we would be losing grazing land. Grazing land of 1050 animals. We need to protect our grazing land! 53-a

TRAFFIC SAFETY

There are no plans in the ERI to upgrade Boyle Road.

There needs to be some changes to Boyle Road. The existing conditions of Boyle Road will not handle the volume of traffic.

Off of Boyle Road between Old Alturas and Deschutes there are 20 or more individual street (homes on each street with access onto Boyle Road) and 57 each individual driveways with access to Boyle Road. Total of 77 access points to Boyle Road and who knows how many homes/ vehicles. Nothing was found in the current EIR covering this. 53-b

Construction starts there will be heavy equipment. Among this will be multiple vehicles. These vehicles will have to enter off Boyle Road, when approaching from the west turning onto Tierra Robles, there will be no left turn lane. It needs a left turn lane.

If 60% if resident will be using Boyle Road to empty from Tierra Robles, there needs to be changes to Boyle Road. 1.) Boyle Road needs to widened 2.)left turn lane add to turn into Tierra Robles street 3.) Bike path is needed and pedestrians path needs to be added. (There is no bus service therefore some children walk and ride the bikes to school. There are runners and biker use Boyle Road.) Shoulders are narrow and need to be improved.

There are numerous obstructions on Boyle Road. One example: is when exiting Maddelein Lane the hill left onto Boyle Road left (west approxitely 600') is/has always problem with cars speeding over the hill in both directions on Boyle Road. The direction going west on Boyle Road is even shorter to new main road from the subdivision. This has not been addressed at all and needs to be. 53-c

Boyle Road has peak traffic flow times. The high school and North Cow Creek are among these high traffic times. 53-d

And another 166 homes will increase the traffic. Boyles Road needs to be improved! 53-e

WASTE WATER TREATMENT

Where will this building be located in the plan? The plan states it will be centrally located, where?

Will there be daily testing of the plants?

Will the greenhouse gases emissions, put out by this plant, be harmful to land, vegetation's, trees, animals and humans?

Who will be doing the monitoring of the treatment plant? 53-f

Is there any worry of an accidental spill from this treatment plant?

If so, would it be harmful to the land, vegetation, trees, animals and humans?

Will there be a smell at certain times of day or certain time of the year? How will this be addressed?

I could go on and on with questions, this is enough for now.

I am submitting November 9, 2012 again.

Sue Harbert

Palo Cedro, CA 96073

COUNTY OF SHASTA CALIFORNIA

COPY

PUBLIC SCOPING SUGGESTIONS/COMMENTS

**TIERRA ROBLES PLANNED DEVELOPMENT PROJECT
ZONE AMENDMENT Z10-002 AND TRACT MAP 1996
ENVIRONMENTAL IMPACT REPORT**

Name: SUE A. HARBERT

Agency:

Mailing Address: 10274 MADDELEIN LN.
PALO CEDRO CA 96073

Phone Number: (530) 223-3251

Comments: SEE ATTACHMENT

you never returned call of 10-27-12

Send To: SHASTA COUNTY
Department of Resource Management
Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001
Attention: Kent Hector, Senior Planner
Fax: (530) 245-6468

What will be the necessary changes and/or requirements to the school properties? 53-g

Who will pay for the necessary changes to the schools, taxpayers?

People that purchase the smaller properties will not desire the same type of lifestyles as the purchasers of the larger properties. There should not be mixed zoning for the parcels. 53-h

Enough for now, looking forward to next public meeting!

Sue Harbert

4

Response to Letter 53 – Sue Harbert

Response 53-a: The commenter notes that the proposed project would require a zone change and a loss of grazing land that needs protection.

The commenter is correct that the proposed project does include a zone amendment, which would change the current zoning from Rural Residential 5-acre minimum (RR-BA-5), Rural Residential 3-acre minimum (RR-BA-3), and Unclassified (U), to a Planned Development (PD) zone district. Section 5.2, AGRICULTURAL RESOURCES, of the Draft EIR identifies 687.87 acres of the proposed project designated by the California Farmland Mapping and Monitoring Program (FMMP) as grazing land, of which approximate 154.6 acres would remain intact. Page 5.2-14 of the Draft EIR concludes that individually this impact would be *less than significant*. Mitigation Measure (MM) 5.2-2 establishes an offsite agricultural conservation easement that shall provide a grazing capacity of 1,044 Animal-Unit Months (AUMs). Although this mitigation would help offset the impacts, the Draft EIR properly concludes that a *significant and unavoidable impact* would result.

The comment will be referred to decision-makers, in this case the Planning Commission and Board of Supervisors, for further consideration as part of the deliberative process. No change to the Draft EIR is required.

Response 53-b: The commenter makes various observations about Boyle Road, including the existing configuration, the adjacent homes that use Boyle Road for access, and mentions increased construction traffic. The commenter states that a left turn is needed into Tierra Robles, Boyle Road needs to be widened, a bike a pedestrian path is needed, and shoulders need improvement.

With respect to construction traffic, heavy equipment will be used during construction and that worker trips would increase. As discussed on pages 5.16-28 through 5.16-29 of the Draft EIR, some traffic delays during project construction would be expected. A Traffic Management Plan (TMP) to address road closures, maintaining access, noticing, adequate sign posting, detours, and permitted hours of construction would be implemented to minimize disruptions. The use of these measures would result in less than significant short-term construction impacts.

With respect to traffic concerns, including Boyle Road, please refer to preceding traffic and circulation responses under ***Response 4-b, 5-f, 13-e, 14-b, 17-n, 17-o, 32-b, 40-a, 43-b,*** *and* ***48-o***. No changes to the Draft EIR are required. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 53-c: The commenter notes numerous obstructions on Boyle Road but only notes the hill prior to Maddelein Lane specifically**.** The speed limit on Boyle Road is posted as 45 miles per hour.

With respect to traffic concerns, including Boyle Road, please refer to preceding responses under ***Response 4-b, 5-f, 13-e, 14-b, 17-n, 17-o, 32-b, 40-a, 43-b,*** *and* ***48-o***.

The University of California, Berkeley, Transportation Injury Mapping System, for the five-year period from January 1, 2013 to December 31, 2017 (Year 2017 being the most recent full-year data), shows all reported vehicle crashes on the public roads in Shasta County.[14] For this five-year period, there have not been any reported vehicle crashes in either direction within ½ mile of Maddelein Lane. No changes to the Draft EIR are required. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 53-d: The commenter states that Boyle Road has peak traffic flow times, with the high school and North Cow Creek being among these high traffic times.

The May 2015 *Traffic Impact Analysis Report*, contained in Appendix 15.9, TRAFFIC IMPACT STUDY, used peak hour traffic flows for intersection analysis and average daily traffic (ADT) for roadway analysis. The ADT level of service (LOS) thresholds are derived based on peak hour capacity analysis. Thus, the intersection and roadway analysis contained in the *Traffic Impact Analysis Report* represent the weekday AM and PM peak periods.

With respect to traffic concerns, including Boyle Road, please refer to preceding responses under ***Response 4-b, 5-f, 13-e, 14-b, 17-n, 17-o, 32-b, 40-a, 43-b,*** *and* ***48-o***. No changes to the Draft EIR are required. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 53-e: The commenter reiterates that Boyle Road needs to be improved.

With respect to traffic concerns, including Boyle Road, please refer to preceding responses under ***Response 4-b, 5-f, 13-e, 14-b, 17-n, 17-o, 32-b, 40-a, 43-b,*** *and* ***48-o***. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 53-f: The commenter questions where the wastewater treatment plant would be located and if there is daily testing, greenhouse gas emissions, monitoring and treatment, concerns about accidental spills, and odors.

The commenter is referred to Section 3.0, PROJECT DESCRIPTION, (page 3-15 and page 3-22 of the Draft EIR) for a detailed description of proposed community wastewater collection and treatment system. Wastewater from the proposed project would be collected via individual residential septic tanks, transferred to a community collection system, treated, and then recycled for roadway median landscape irrigation. This system must obtain the requisite Central Valley Regional Water Quality Control Board (CVRWQCB) Waste Discharge Requirements permit. The wastewater treatment plant is proposed for Lot 73 (refer to Figure 3-10a, WASTEWATER TREATMENT SYSTEM, on page 3-25 of the Draft EIR).

[14] https://tims.berkeley.edu/

The individual septic tanks would include carbon filters to control odors. The wastewater treatment system would be designed to meet the reuse requirements for discharge of Title 22 (Disinfected Secondary Effluent). Title 22 reuse requires daily testing for coliform and also includes provisions for odor and nuisance control. Furthermore, the project would be required to comply with SCAQMD Rule 3:16 and *California Health & Safety Code* Section 41700, which prohibits the discharge of contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public.

The commenter is referred to ***Master Response-5*** and preceding responses under ***Response 13-d, 17-b,*** and ***17-j*** for information regarding the grey water reuse system, disinfection, odor management, and safety measures to ensure impacts are *less than significant*. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Regarding greenhouse gas emissions, the commenter is referred to Section 5.7, GREENHOUSE GASES AND CLIMATE CHANGE. Page 5.7-13 through 5.17-16 disclose the emissions and associated impacts of the proposed project, which includes the wastewater treatment system, and proposed mitigation to reduce the level of impact. The Draft EIR concludes and properly discloses that impacts related to greenhouse gas emissions would exceed thresholds both at the project level and cumulatively and are considered significant and unavoidable. No changes to the Draft EIR are required.

Response 53-g: The commenter questions who will pay for the necessary changes to schools and alludes to raising of property taxes.

The commenter is referred to Section 5.13, PUBLIC SERVICES AND FISCAL IMPACTS. Page 5.13-13 of the Draft EIR addresses the payment of school fees that would be incurred by the proposed project and would generate approximately $1,980,048 to be distributed to the local school districts. In addition, page 5.13-14 in Section 5.13, PUBLIC SERVICES AND FISCAL IMPACTS, notes that Foothill High School, Columbia Elementary School, and Mountain View Middle School have been experiencing a declining enrolment and therefore has capacity to accommodate and increased student population. The Draft EIR concluded that impacts would be *less than significant*. For additional details, refer to preceding ***Response 37-b***. No change to the Draft EIR is required.

Response 53-h: The commenter makes a statement that people purchasing smaller lots will not want the same lifestyle as those purchasing larger lots.

Comments regarding the proposed project's ultimate appropriateness for the site or comments that do not directly raise an environmental issue are referred to decision-makers, in this case the Planning Commission and Shasta County Board of Supervisors, for further consideration as part of the deliberative process. Differing desires of potential future property owners do not constitute or rise to the level of a "physical changes" as defined by the State *CEQA Guidelines* §15064. No change to the Draft EIR is required and the opinion does not warrant a detailed response under CEQA.

The commenter states there should not be mixed zoning for the parcels. The proposed project does not propose to mix zoning. The proposed project includes a zone amendment, which would change the current zoning from Rural Residential 5-acre minimum (RR-BA-5), Rural Residential 3-acre minimum (RR-BA-3), and Unclassified (U), to a Planned Development (PD) zone district. The commenter is referred to ***Master Response-2*** for additional information regarding the project's proposed zoning and density.

Letter 54 – Jacqueline Matthews (December 21, 2017)

December 21, 2017

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

COMMENTS ON EVIRONMENTAL IMPACT REPORT FOR THE PROPOSED TIERRA ROBLES PLANNED DEVELOPMENT PROJECT

Dear Mr. Hector:

I am a resident living in the vicinity of the proposed Tierra Robles Planned Development Project (Project) and have major concerns regarding potential traffic impacts along Old Alturas Road. In 2016, I purchased a home along Old Alturas Road, just west of the proposed project outlet onto Old Alturas Road and Seven Lakes Road. In the year that I have resided in the area, I have observed significant traffic along Old Alturas Road (between Old Oregon Trail and Deschutes Road). I have concerns regarding <u>increased traffic</u> from the Project along <u>Old Alturas Road, north of Boyle Road to Deschutes Road</u>, as follows:

1) The road is highly travelled at commute times and is a popular route to Redding for residents living in Bella Vista. 54-a
2) This stretch of road is narrow with no shoulders.
3) Trees are immediately adjacent to the road north of Seatac Lane.
4) Wildlife cross the road daily (deer, turkey, turtles, coyotes).
5) There are frequent wildlife and domestic animal fatalities.
6) Drivers traverse the road at a high rate of speed. The posted speed limit is 40 miles per hour, but drivers easily hit speeds in excess of 60 miles per hour.
7) Significant flooding occurs along this stretch of road during the winter time. I observed significant flooding during the 2016/2017 winter on Old Alturas Road at 1) the crossing of the ephemeral stream east of Easy Street and 2) at Clough Creek at Seven Lakes Road in excess of five times. These flood events occurred after short intense rain bursts and prevented homeowners living in the area from accessing their residences. Any increased impervious areas from the Project will only compound flooding and traffic issues. 54-b
8) Increases in noise from construction and residential traffic going to and from the Project.
9) Fire danger is high/extreme in this area. Additional traffic and residences will only compound the fire danger. 54-d

I have reviewed the *Traffic and Circulation Section* of the Environmental Impact Report (EIR) and believe it to be **inadequate** for the following reasons:

1) The EIR did not adequately consider that the stretch of <u>Old Alturas Road, from Seven Lakes Road to Boyle Road</u>, will likely be used by a large portion of residents that reside on the northern side of the Project to enter the City of Redding; this section of Old Alturas is currently used by many residents of Bella Vista as a 'short-cut' into the City and it is the preferred route over Hwy 299. This stretch of road is narrow with no shoulders, abundant wildlife, and many residences. 54-e

   Suggestions: Reassess the number of residents that will use the stretch of Old Alturas Road, from Seven Lake to Boyle road, to access Redding. Include Old Alturas Road, from Seven Lakes

Mr. Kent Hector
December 21, 2017

2

Road to Boyle Road, in the discussion on pages 5.16-6 and 5.16-7. Propose mitigation measures for this stretch of Old Alturas, such as, flashing speed limit signage and installation of paved shoulders along the road for safety. And/or propose an alternative or additional outlet onto Deschutes Road. 54-e Cont.

2) Page 5.16-6 does not include complete statistics on the reported number of collisions for the section of Old Alturas Road from Deschutes Road to Seven Lakes Road. The text of the document seemingly ends in the middle of the statistics. 54-f

Suggestions: Include the statistics on the 6 reported collisions in 2015 and include that the collision rate of 33 percent is statistically significant. Include mitigation measures for this stretch of Old Alturas Road, at a minimum, the installation of paved shoulders. And/or propose an alternative or additional outlet onto Deschutes Road.

3) All of the Figures in Section 5.16, seven in total, were not accessible online and therefore not available for public review/comment. 54-g

The outlet from the Project onto Old Alturas is a safety hazard, for the reasons discussed in items #1-9 above. The EIR is inadequate for the reasons discussed in #1-3; additional analysis and mitigation measures are necessary as discussed under "Suggestions". Outlet alternatives for the Project, to help address the items detailed in this letter, are discussed below.

Project Outlet Alternatives:

1) Include an outlet from the Project onto Deschutes Road *in lieu* of the outlet onto Old Alturas. An outlet onto Deschutes Road from the eastern portion of the Project is a preferred alternative to the outlet onto Old Alturas because appropriate road infrastructure already exists on Deschutes (i.e. paved shoulders, wider lanes, not subject to regular winter flooding). An additional outlet onto Deschutes Road would also improve fire safety access to the eastern portion of the project, which is in an extreme fire danger area. 54-h
2) Include an *additional* outlet onto Deschutes Road (for a total of three Project outlets (1-Boyle Road, 2-Old Alturas Road, 3-Deschutes Road)). An additional outlet onto Deschutes Road would break up traffic volume, reducing driver hazards, noise, and wildlife impacts. The additional access point would improve fire safety access to the Project.

I employ you to seriously consider requiring road mitigation measures (as proposed in this letter) on Old Alturas from Deschutes Road to Boyle. Moreover, I employ you to seriously consider requiring an additional outlet onto Deschutes Road to help reduce traffic impacts and improve safety in this rural area. 54-i

Respectfully,

Jacqueline Matthews
Resident along Old Alturas Road
jcmatthews81@gmail.com

ec: Kimley-Horn and Associates, Inc., Sacramento, services@kimley-horn.com

Response to Letter 54 – Jacqueline Matthews

Response 54-a: The commenter states concern regarding traffic on Old Alturas Road north of Boyle Road to Deschutes Road because the road is highly travelled, is narrow with no shoulders, areas have trees adjacent to the roadway, and there are collisions between vehicles and wildlife/domestic animals.

Please refer to preceding traffic and circulation responses under ***Response 4-b, 5-f, 13-e, 14-b, 35-c, 40-a,*** and ***43-b*** regarding traffic and safety. Section 5.16, TRAFFIC AND CIRCULATION, and Appendix 15.9, TRAFFIC IMPACT STUDY, of the Draft EIR provide further detail regarding traffic impacts. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 54-b: The commenter states that significant flooding occurred along Old Alturas Road north of Boyle Road to Deschutes Road during 2016 – 2017 and is concerned impervious surfaces built as part of the proposed project will increase flooding risk.

The commenter is referred to page 5.19-18 in Section 5.9, HYDROLOGY AND WATER QUALITY, which discussed the potential for increased flooding. The Draft EIR discussed infiltration, runoff, and how new impervious surfaces can affect hydrology and may affect downstream flooding. The Draft EIR concluded that there was no change in the pre- and post-development flow of Clough Creek due to the use of onsite LID facilities to retain the additional storm water runoff that would result from roof impervious areas significantly reduces the total impervious area of the basin. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 54-c: The commenter makes a statement regarding increased noise from project-related traffic entering and exiting the site.

Regarding traffic noise, please refer to ***Response 41-a***, above. Traffic-related noise impacts were determined to be *less than significant*. No issue or adequacy of the Draft EIR was raised by the commenter. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 54-d: The commenter notes that fire danger is high and the project will compound the issue.

The commenter is referred to ***Response 43-e***. The Draft EIR concluded that impacts would be *less than significant*. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 54-e: The commenter requests that traffic impacts be reassessed for Old Alturas Road from Seven Lakes Road to Boyle Road and requests that mitigation such as flashing speed limit signs and paved shoulders be required as well as consideration given to an additional access directly to Deschutes Road.

The May 2015 *Traffic Impact Analysis Report*, contained in Appendix 15.9, TRAFFIC IMPACT STUDY, identify that the average daily traffic (ADT) on Old Alturas Road, between Boyle Road and Seven Lakes Road, will increase by 17 vehicles per day as a result of the project. The project impact to Old Alturas Road is *less than significant*.

The commenter requests flashing speed limit signs. Vehicle Speed Feedback Signs are traffic control devices that are regulated in California by the *California Manual on Uniform Traffic Control Devices, 2014 Edition, Revision 3, March 9, 2018* (MUTCD). The MUTCD specifies the standards and guidelines, followed by Shasta County. Vehicle Speed Feedback Signs can be used to reinforce a driver's awareness of speed limits. The University of California, Berkeley, Transportation Injury Mapping System, for the five-year period from January 1, 2013 to December 31, 2017 (Year 2017 being the most recent full-year data), shows all reported vehicle crashes on the public roads in Shasta County.[15] For this five-year period, there were three reported crashes on Old Alturas Road, between Boyle Road and Seven Lakes Road. The primary collision factor for each of the crashes was "improper turn" or "driving under the influence of alcohol or drug". In the absence of evidence of speed related crashes, Vehicle Speed Feedback Signs are not recommended as project mitigation.

The May 2015 *Traffic Impact Analysis Report* did not identify a significant impact that would warrant a requirement for a direct connection from the project to Deschutes Road. The access points for the project were shown to be adequate.

In addition, please refer to preceding traffic and circulation responses under ***Response 14-b, 35-c, 40-a,*** and ***49-b***. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 54-f: The commenter states that the Draft EIR does not include complete statistics on the number of collisions for the section of Old Alturas Road from Deschutes Road to Seven Lakes Road. The commenter states that the collision rate of 33% is statistically significant. The commenter also requests mitigation measures including paved shoulders.

The text on page 5.16-6 of the Draft EIR has been revised to include all six primary collision factors so that the EIR now includes: 1 DUI, 1 hitting an animal, 1 unsafe speed, and 2 improper turn. With this revision, the EIR text matches the information in Appendix 15.9, TRAFFIC IMPACT STUDY.

With respect to project-specific impacts related to traffic and safety, please refer to preceding traffic and circulation responses under ***Response 14-b, 40-a, 48-k,*** and ***48-p*** Please also refer to Impact 5.16-2 in Section 5.16, TRAFFIC AND CIRCULATION, and

[15] https://tims.berkeley.edu/

Appendix 15.9, TRAFFIC IMPACT STUDY, for additional details on traffic and safety related impacts. As discussed in Impact 5.16-2, the section of Old Alturas Road between Deschutes Road to Seven Lakes Road is curvilinear and narrow with roadside obstructions. This section of rural roadway has a collision rate 33% higher than the statewide average for similar facilities. It is estimated that 17% of the project traffic will use this section of roadway which will increase the ADT by 27% in the *Existing Plus Project* conditions and by 23% in the *Year 2035 Plus Project* conditions. The increase in traffic, in combination with the overall very low traffic volumes and LOS A conditions, is not expected to significantly increase the rate of collisions. *Less than significant* impacts would occur in this regard.

The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 54-g: The commenter notes technical difficulties in accessing the figures in Section 5.16, TRAFFIC AND CIRCULATION, of the Draft EIR.

The commenter is referred to ***Master Response-1***, above. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 54-h: The commenter expresses concern that the currently proposed access from the project site to Old Alturas Road is a safety hazard and suggests project outlet alternatives including an outlet from the project site to Deschutes Road, either in addition to the currently proposed outlets or in lieu of the currently proposed outlet to Old Alturas Road.

With respect to project-specific impacts related to traffic and safety, please refer to preceding traffic and circulation responses under ***Response 14-b, 40-a, 48-k,*** and ***48-p.*** With respect to project site access, because of biological restrictions, the resource management areas (RMAs) identified onsite, and the proposed site plan (refer to Draft EIR Figure 3-6, PROPOSED TENTATIVE MAP) no site access to Deschutes Road is proposed. In addition, there is no feasible access between the project site and the existing roadway network that would not require right-of-way acquisition from neighboring parcels. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 54-i: The commenter restates the position of requesting road mitigation and requests an additional outlet to Deschutes Road.

Please refer to ***Response 54-a*** through ***Response 54-h***, above. No new issue or adequacy of the Draft EIR was raised by the comment that was not discussed above. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Letter 55 – Maggie Freeman (December 22, 2017)

Kimberly Hunter

From: Resource Management
Sent: Friday, December 22, 2017 8:16 AM
To: Kimberly Hunter
Subject: FW: Tierra Robles Subdivision

Tracie Huff
Administrative Secretary I
Shasta County Resource Management
1855 Placer Street
Redding CA 96001
(530) 225-5532 Phone
(530) 245-6468 Fax

From: mconlinn@citlink.net [mailto:mconlinn@citlink.net]
Sent: Thursday, December 21, 2017 12:11 PM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: Tierra Robles Subdivision

Dear Sir,

I will be brief.

I oppose this subdivision because there is not enough water, not enough sheriff's deputies, not adequate
roadways, and it appears the sewage facility will line up with the end of our street. 55-a

Mark me down as opposed to this subdivision.

Maggie Freeman
11386 Easy St.
Redding, Ca 96003
530-549-4270

1

Response to Letter 55 – Maggie Freeman

Response 55-a: The commenter opposes the project and states reasons such as lack of water supply, lack of Sheriff services, inadequate roadway networks, and potential location of the sewage facility.

The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

With respect water supply, the commenter is referred to ***Master Response-3***, as well as preceding ***Responses 7-a*** through ***7-p***. With respect to traffic impacts and the roadway infrastructure, refer to preceding traffic and circulation responses under ***Response 4-b, 5-f, 13-e, 14-b, 17-f, 17-n, 17-o, 40-a,*** and ***43-b***. With respect to the wastewater facility (sewage facility), please refer to ***Master Response-5*** and preceding responses under ***Response 13-d, 17-b,*** and ***17-j***.

For additional information regarding public services and utilities and service systems, including the proposed sewage facility, the commenter is referred to Draft EIR Section 5.13, PUBLIC SERVICES AND FISCAL IMPACTS, and Section 5.17, UTILITIES AND SERVICE SYSTEMS, which concluded that each of the referenced topics were evaluated in the Draft EIR and concluded impacts would be *less than significant* or *less than significant after mitigation*. No further response is necessary and no change to the Draft EIR is required.

Letter 56 – Rick Thompson (December 22, 2017)

Kimberly Hunter

From: Resource Management
Sent: Friday, December 22, 2017 8:17 AM
To: Kimberly Hunter
Subject: FW:

Tracie Huff
Administrative Secretary I
Shasta County Resource Management
1855 Placer Street
Redding CA 96001
(530) 225-5532 Phone
(530) 245-6468 Fax

From: Rick Thompson [mailto:rickt2100@gmail.com]
Sent: Thursday, December 21, 2017 3:02 PM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject:

56-a

No on terrace robes project,there is already to much unmonitored traffic on these roads,not enough water

1

Response to Letter 56 – Rick Thompson

Response 56-a: The commenter states opposition to the proposed project stating issues related to water and unmonitored traffic.

No issue or adequacy of the Draft EIR was raised by the commenter. However, the commenter is referred to ***Master Response-3*** regarding water supply. The commenter is also referred to Section 5.16, TRAFFIC AND CIRCULATION, for a discussion of traffic-related impacts. This comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No change to the Draft EIR is necessary.

Letter 57 – Christie Smith (December 22, 2017)

12/22/2017
VIA EMAIL

Kent Hector, Senior Planner, Kim Hunter, Director
Shasta County Department of Resource Management
Planning Division
1855 Placer Street, Redding, CA 96001

Mr. Hector

Re: Tierra Robles Planned Development

Please consider the following comments, questions, concerns, and conditions of approval regarding the Tierra Robles Planned Development: 57-a

1. This is a proposed development of 166 units. Are these parcels excluded from having an accessory dwelling unit such as in-law quarters? If not, than each parcel could request an accessory dwelling unit and we are then dealing with a vast variety of impacts from as many as 332 units. Why not simply condition the project to prohibit (or limiting the allowable number to a very small percent) any second units on parcels within this planned development through zoning or other permanent means. Additionally, out of 166 homes you should expect that some of them may have illegal room conversions to bedrooms, garage conversions, or just illegal habitation of travel trailers as can be found around Shasta County today. 57-b

2. How is the County going to limit irrigation water use and meet the requirements of MWELO on these parcels? If the project is approved, a Shasta County department must have some way to monitor and cite, if necessary, extensive use of irrigable exterior landscaping to prevent large irrigated areas on each parcel. This is not a responsibility that the County should dump onto BVWD which is an organization that provides water service to its customers and is not equipped to be an enforcement agency required to inspect and monitor irrigation water use. Neither is this something that could possibly be regulated by a CSD (see comments below). This development is a planned community of what appears to be large, expensive homes. Interior and exterior water use would usually be higher with purchasers of these homes as they can afford to use water and pay any penalties for overuse during drought situations. 57-c

3. Given recent problems with County Water CSA's why would Shasta County want to form a CSD knowing that the Shasta County Board of Supervisors will be the CSD Board until enough parcels are developed to allow election of a CSD Board? Who will enforce the various development standards if the CSD Board (elected from only 166 parcels of neighbors and 57-d

community members) fails to act? We have a second home with a homeowner association to enforce many of the same conditions and CCR's but this enforcement is variable, changing with committee and Board membership - they frequently allow projects and construction clearly at odds with written requirements and CCR's leaving it up to an individual homeowner to file a lawsuit against a neighbor to enforce CCR's. The project developer will initially appoint a design review committee that at some point will revert back to the residents of the development making it much easier to vary from the proposed plans and allow development in the non-disturbance areas. This would appear to be contrary to wetlands regulations and mitigation's. 57-d Cont.

4. The Central Valley Regional Water Quality Control Board recently commented to you (and made those comments available to the public) that they support efforts to end the proliferation of small community treatment plants (such as the one proposed here) which are costly to operate and frequently are found to be out of compliance with regulatory requirements. What local public agency has the funding (and the desire) to responsibly operate this system? Conditioning the development to pump effluent to the Palo Cedro CSA seems like a better idea. 57-e

5. While I am writing this I am waiting for the CD of the appendices because I was unable to down load some of them. FYI - I am using the same internet provider that would serve this planned development. This system appears to be slow, has frequent problems resulting in programs not responding to commands, and will not get any better by adding the homes in this development. I would suggest a condition of approval to require the installation of new internet service lines to serve this planned development and everyone else in the area. This would be similar to conditions of approval addressing the installation of new power, phone, and water lines as required by the respective providers. 57-f

6. Where are the soil test results that show that soils within this development can handle the wastewater flow from 166 dwellings and an unknown number of secondary units? Shasta County was recently forced by California law to adopt new sewage disposal regulations that include individual systems designed to treat household wastewater and filter it for drip dispersal of effluent (similar to what is proposed here). This site will have a sewage disposal system approximately 166 times greater (or more depending on the number of second dwelling units) than the individual system regulated by Shasta County. Shouldn't this site show that it meets or exceeds the same soil standard for sewage disposal that the State of California forces local property owners to meet? 57-g

7. Table 5.16-1 lists recent yearly "collisions". These numbers do not include numerous incidents where vehicles damage fences, landscaping, and paper or mail boxes or where vehicles end up in drainage ditches or stuck off of the road in mud. For example, one group of trees near the eastern end of Boyle was struck twice in the past six months as evidenced by skid marks, damage to the trees, and tire tracks into the mud as drivers took sharp turns too fast. Many of these incidents are not reported by drivers and may be discovered by property owners after the fact. Additionally deer, coyotes dogs, cats, and other mammals and buzzards, hawks, and other birds are killed on roads proposed for use by this planned development. Many times property owners and local citizens remove these dead animals left on or adjacent to roads and collect no compensation for damaged property as described above. What condition of approval will correct this? My recommendation is to condition the project to have the developer purchase right-of-way, as needed, to straighten out the four dangerous curves on Boyle Road and construct those improvements prior to the sale of any parcels/homes. Over the years, several county residents have been seriously injured and have even died at these curves so why not reduce this accident hazard for us and for purchasers of parcels within the development. Further, there does not appear to be a left hand turn lane on Boyle from the development. I can not think of another development, large or small, in the county or cities that was built without this turn lane. Condition the project to require this turn lane. 57-h

8. During morning and evening commutes, and mornings North Cow Creek School, Bella Vista School, and Foothill High School are in session, traffic on the roads serving this planned development are dangerous. Drivers take sharp curves too fast for the narrow road widths and this will only get worse if the project is approved (see # 7 above). As a condition of approval we look forward to seeing Boyle Road and portions of Old Alturas Road widened and straightened to prevent further accidents and near misses when nearly 1800 new vehicle trips are added by this development (Table 5.16-8). Table 5.16-9 indicates that there will be 1,793 average daily trips on Boyle Road (Existing plus Project) and Table 5.16-8 projects 1774 new vehicle trips so which figure is the correct number of vehicle trips on Boyle Road? Please excuse me if I misunderstood the vehicle trip numbers given in the traffic report. What is planned to safely address the dangers of all of these additional vehicles crossing Deschutes Road as vehicles cross to North Cow Creek school or cross to drive North on Deschutes Road. This intersection has limited site distance for the speeds driven (in excess of posted speed limits) on Deschutes Road making stop signs or signals on the blind 57-i

intersection (from two of the four street directions) seem like a dangerous proposition. 11% funding of street crossing/signal/sign improvements doesn't seem adequate for the additional risk (with no time frame given for these improvements). There has been at least two accidents at this intersection since the Draft EIR was released for review. 57-i Cont.

I do not understand why the Airport Road/Hwy 44 intersection will receive priority over the Boyle/Deschutes Roads intersection and improvements along Boyle Road. Using Boyle Road to either Deschutes Road or to Old Alturas to travel to Redding does not involve the use of the 44/Airport Road intersection (which is in the City of Redding and not in the unincorporated area of Shasta County). 57-j

I was not aware that the City of Redding generously shares their funding with the County or BVWD so why is this improvement funding given to Redding? I would propose that a much better alternative would be to access the development solely from Deschutes Road through a newly constructed road to eliminate the massive traffic impacts to Boyle Road and the related intersections. 57-k

9. As a condition of approval require the construction of a bike lane along the entire length of Boyle Road and from Boyle Road to Foothill High School along Deschutes Road and from the project along the north access road onto Old Alturas Road to Bella Vista School. 57-l

10. As a condition of approval prohibit the removal of any Oak Trees and riparian vegetation from the development. 57-m

11. As a condition of approval prohibit the drilling of any water wells within the development boundaries (water well quantity and quality are probably not suitable anyway). The BVWD will assume ownership of the water delivery system and fire hydrants within the development and needs revenue from all of the parcels to maintain those facilities. Allowing the drilling of private wells (as the County has done on numerous subdivisions reviewed and approved under CEQA as being served by public water) so that the builder/owner does not need drinking water from BVWD reduces that necessary revenue and harms the District financially. BVWD still needs to maintain the pipelines, valves, and fire hydrants. Will Shasta County make up that revenue shortfall? 57-n

12. I disagree with the findings of "Less Than Significant Impacts" with regards to the quality and quantity of storm water run off from the development. Feces from domestic and farm animals, storm runoff, and upset conditions from the sewage treatment system, and improperly constructed and used greywater systems will certainly impact storm water quality. Additionally how could 166 homes, an unknown number of secondary dwelling units, and numerous detached garages, barns, sports 57-o

courts, and other similar structures, plus all of the development roads, driveways, and other paved and concrete areas of each parcel not seriously impact the quantity of storm water run off? Cattle, horses, and other larger animals compact the soil within their pens, further leading to loss of storm water percolation, adding to storm run off. Each one of these reduces the exposed soil area for storm water percolation. I would recommend the following conditions of approval: 57-o Cont.

1. There shall be no farm animal pens within 150 feet of run off channels.
2. Storm water retention basins be constructed at every drainage discharge point from the development. At a minimum, retention basins are to be designed to hold water for at least a 24 hour period for sediment removal and to eliminate surge flows from the site. Additionally, beyond the 24 hour retention time, the basin is to be large enough to contain all run off from a one hour storm of 1 inch per hour proportions (this would be significantly larger than the LID proposal in the DEIR because roof structures (the reason that LID's are mentioned in the EIR) would be a small percentage of total site coverage when roads, driveways, and other surface paving or compaction are counted).

13. As a condition of approval require that any portion of the sewage treatment plant and secondary disposal area be constructed at least 150 feet from the development perimeter to reduce the potential of odors drifting off site during periods of upset and maintenance. If this sewage treatment system is of such a wonderful, odorless design then place it next to development homes and not at an adjacent property boundary. 57-p

14. As a condition of approval prohibit ANY disturbance within at least 150 feet of Clough Creek. 57-q

15. It is not clear from the narrative what chlorine compound is to be used for sewage effluent disinfection. As a condition of approval note that chlorine gas use is prohibited as it is just too dangerous for a tiny CSD to properly train for and handle. 57-r

16. With respect to the greywater systems, who is responsible for operating flow diversion devices during rainy periods so that they are not used during rainy periods when the soil is saturated? I would not expect the CSD or property owners to handle this task. Who will be responsible for routine maintenance of these systems? They do require tank cleaning and other maintenance to function properly. Who will be responsible for this maintenance? The average homeowner does not have the ability to maintain these systems. 57-s

17. Grading plans to construct improvements for the development, are highly regulated while I do not see any discussion of the same regulation of driveway, residential pads, and other similar grading (with the exception of a stormwater retention pond on each lot) to construct improvements as each parcel is developed. Who is going to enforce the same provisions with respect to these grading operations? The conditions placed on the site developer exceed normal conditions placed on grading permits for dwellings and driveways and I would encourage the same conditions on residential construction. 57-t

18. The vesting tentative map includes the terms Resource Management Area and NON-Disturbed Private Open Space on each Lot Book Page. If I understand these terms correctly, the Resource Management Area of each parcel can not be disturbed unless the CSD (see #3 and 17 above) and Shasta County approve the disturbance. What County agency has been designated to enforce this Non-Disturbance concept? Resource Management does not patrol the county seeking out violations, instead relies on citizen complaints to identify code or development violations. The complaints received by the County are probably a very small percentage of actual violations or variations from codes and standards. I would propose to eliminate the ability to construct improvements, including fencing, and conducting any other form of disturbance in these private-owned open space areas. 57-u

19. The design guidelines to be "enforced" by the CSD contain few "shall" requirements but are guided by numerous "should" language making compliance variable based in the make up of the design review committee (see # 3 above). While this may be acceptable for structure construction styles and details it is not acceptable for any site disturbance activity to include grading, fencing, and other structures. "Should" would appear to mean that yes, you may vary what you want to do from what we want people to think we want you to do based on your ability to convince the design review committee to allow something. In ten years no one at Shasta County will know that a note on the map prevents certain activities or can easily allow these activities through human error. 57-v

20. I am opposed to the rezone on these parcels. Should a subdivision be approved then the development should be limited only to the number of parcels allowed under the existing zoning. 57-w

21. The Shasta County Sheriff's Department does not have the capacity to respond to anything but routine incidents in Shasta County and adding 166 homes will not provide enough funding to add Deputies to patrol Palo Cedro. Neither will taxes from 166 homes allow Deputies to be paid a higher salary to promote retention of the more qualified officers who, after gaining 57-x

minimal experience, routinely leave for jobs in higher paying jurisdictions nor allow more prisoners to be housed in the County jail. 57-x

22. Shasta County has a need for affordable housing and the homes depicted in the DEIR are definitely not considered "affordable" to the vast majority of Shasta County citizens. We moved to Palo Cedro for the quiet, rural atmosphere and approval of this planned development would go a long way in turning this rural community into a crowded urban area. This development does not fit into this neighborhood and needs to be denied. Build this development on property in the City of Redding where water, sewer, police, and fire services are readily available. Additionally a similar development, Tierra Oaks, has dozens of vacant lots awaiting the construction of very large, expensive homes so why do we need to approve another development that will take decades to build out. 57-y

Thank you for the opportunity to comment on the Draft EIR and I appreciate the extension of the comment period. 57-z

Christie Smith
10613 April Lane
Palo Cedro

Response to Letter 57 – Christie Smith

Response 57-a: The commenter makes an introductory statement requesting the comments in the letter are considered. No issue or adequacy of the Draft EIR was raised by the commenter. Specific comments in the letter are addressed individually below. No change to the Draft EIR is necessary.

Response 57-b: The commenter questions the use of accessory dwelling unit and states that every unit could request an accessory dwelling. The commenter suggests conditioning the project to disallow or limit accessory units. The commenter also questions that some residents will use illegal room conversions to bedrooms or other illegal habitation.

The commenter is referred to page 5.12-8 in Section 5.12, POPULATION AND HOUSING, which notes that pursuant to Government Code §65852.2 every approved residential lot would be entitled to an accessory dwelling unit. The commenter also is referred to page 3-16 of Section 3.0, PROJECT DESCRIPTION, which explains that the estimate of 9% of residences having accessory dwelling units is based on data compiled as part of the County's 2009-2014 Housing Element (Appendix B-Residential Land Inventory) and the County's Draft Housing Element (Appendix B-Residential Land Inventory.

Regarding the commenter's questions regarding illegal activity resulting in additional residents. State *CEQA Guidelines* §15064 (d)(3) states, "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable." It is speculative to state that future residents would illegally convert rooms and that such a conversion would have a negative impact on the environment. CEQA analysis is limited to what is known or reasonably foreseeable, therefore, this speculation is not a part of the analysis included in the Draft EIR. No change to the Draft EIR is required.

Response 57-c: The commenter questions enforcement of water use restrictions and states the responsibility should not fall to the Bella Vista Water District (BVWD). The commenter then states that the large and expensive homes will use more water.

Please refer to ***Master Response-3***, above, as well as preceding ***Responses 7-b*** through ***7-p***, above for a discussion related to water use and associated impacts. More specifically, the commenter is referred to preceding ***Response 7-c***, which further provides further details about the Model Water Efficient Landscape Ordinance (MWELO) and explains that the expected water use of the proposed project is similar to that of other rural residential users within the BVWD.

As discussed on page 3-12 of Section 3.0, PROJECT DESCRIPTION, the proposed project includes the formation of the Tierra Robles Community Services District (TRCSD) after approval by the Shasta County Local Agency Formation Commission. The TRCSD would be used as a means to oversee and implement the plans and facilities within the development and they would oversee the *Tierra Robles Design Guidelines*; *Tierra Robles Oak Woodland Management Plan; Tierra Robles Wildland Fuel/Vegetation Management Plan*, Open Space Management, and Resource Management Area

Management and Oversight; Road Maintenance; Storm Drain Maintenance; and Waste Water Collection, Treatment and Dispersal Facilities. In addition, the TRCSD would be used as a means to oversee, implement and enforce compliance with the State MWELO or County ordinance requirements (if more restrictive than the State MWELO). As such, the TRCSD would largely act as a Homeowners' Association (HOA) in addition to having more responsibility in the management of the proposed project. It will be incumbent on the TRCSD to make all property owners aware of all covenants and conditions regarding use of all properties within the development; refer to Appendix 15.2, TIERRA ROBLES COMMUNITY SERVICES DISTRICT. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 57-d: The commenter questions the formation of the TRCSD and questions who will enforce the various development standards if the CSD Board fails to act.

This comment is specific to the formation of the TRCSD and the actions of the TRCSD, rather than specific to the EIR analysis of physical environmental impacts, mitigation measures, and level of significance associated with the proposed project. The project applicant and the County will work with Shasta County Local Agency Formation Commission (LAFCO) to form the TRCSD.

Community Service Districts are formed and operated in accordance with California Government Code Section 61000 et seq. A CSD is a government agency which may be endowed with a wide range of powers, which are specifically designed to provide urban or suburban services within unincorporated areas. In the case of Tierra Robles, the CSD would be a single multipurpose entity with taxing powers and the flexibility to provide all required services including operation and maintenance of a wastewater treatment system, maintenance of improved streets within the project area, management of open spaces, including preservation and fire management operations, and maintenance of drainage improvements. In addition, a CSD can be used to enforce covenants, codes, and conditions, including conditions of approval, or mitigation.

The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 57-e: The commenter states concern that the proposed onsite wastewater treatment plan will not be adequately supported by the proposed CSD and recommends requiring a condition to pump effluent to the Palo Cedro CSA.

The commenter is referred to Section 5.17, UTILITIES AND SERVICE SYSTEMS, which discloses potential impacts associated with the operation of the wastewater treatment plan and explaining how it would stay in compliance with Title 22 and other requirements. Impacts were determined to be *less than significant*.

The commenter is referred to ***Master Response-5*** and preceding responses under ***Response 13-d, 17-b*** and ***17-j*** in regards to previous commenter concerns of insufficient wastewater capacity, odors and maintenance, monitoring, and treatment, ***Response 17-b*** related to grey water use and monitoring and treatment. The

commenter is also referred to preceding ***Response 53-f*** in regards to the location of the proposed treatment plant, testing of water and greenhouse gas emission. All these responses, as well as Section 5.17, UTILITIES AND SERVICE SYSTEMS, will provide the commenter with additional information regarding the grey water reuse system, disinfection, odor management, and safety measures to ensure impacts are *less than significant*. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-f: The commenter notes an inability to download some portions of the appendices and notes that the internet system in the project area is slow. The commenter suggests a condition of approval to require installation of new internet lines to serve the proposed project.

The question of internet quality, however, is not an issue for CEQA. State *CEQA Guidelines* §15358(b) state that effects analyzed under CEQA must be related to a physical change in the environment. The commenter is referred to preceding ***Response 48-c***. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-g: The commenter questions where the soil test results are and questions that the on-site soils can adequately handle wastewater dispersal.

The commenter is referred to preceding ***Response 43-d*** for a discussion of the site soils and use for dispersal. The commenter also is referred to Section 3.0, PROJECT DESCRIPTION, (page 3-15 and page 3-22) for a detailed description of proposed community wastewater collection and treatment system. Regarding the concern of meeting the same standards the State of California requires of local property owners, the wastewater treatment system would be designed to meet the reuse requirements for discharge of Title 22 (Disinfected Secondary Effluent). The commenter is referred to preceding ***Master Response-5*** for more information. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary.

Response 57-h: The commenter is concerned with traffic safety and accident rates, including impacts with animals within the study area roadways, especially Boyle Road, and requests a condition of approval to require the project developer to provide improvements to the four curves on Boyle Road and to require turn lanes on Boyle Road at the project site's entrance.

The commenter is referred to pages 5.16-6 and 5.16-7 of the Draft EIR (Section 5.16, TRAFFIC AND CIRCULATION) which discloses that there have been four reports of animal related collisions during the study period.

The commenter is also referred to the following responses related to overall roadway safety and proposed improvements to area roadways and intersection to improve traffic safety. ***Response 4-b*** related to intersection improvements to enhance safety***,*** ***Response 5-f*** regarding the timing of improvements, ***Response 14-b*** for a discussion of

roadway safety and determination of collision rates, ***Responses 17-n*** and ***17-o*** for installation of warning signs to improve safety, ***Responses 17-p*** and ***40-a*** for a discussion of roundabouts associated improvements to safety versus traffic signals.

Traffic impacts and required mitigation measures are analyzed in detail in Section 5.16, TRAFFIC AND CIRCULATION, and Appendix 15.9, TRAFFIC IMPACT STUDY, of the Draft EIR. When requiring roadway improvements associated with a specific project, the fair share cost or payment can be based upon the percentage of project traffic at the particular intersection and/or road system. Refer to ***Response 17-p*** for further discussion regarding fair share funding.

County roadway improvements that are not directly related to the proposed project, and are not required as mitigation for project-specific traffic impacts. These are roadway improvements and safety program concerns that can be accommodated by the Regional Transportation Plan (RTP). A RTP is a regional long-range transportation plan that is developed using growth forecasts and that considers the role of transportation in the broader context of economic, environmental, and quality of life to develop a strategy to address mobility needs.

The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-i: The commenter expresses concern with school related traffic impacts, the increase in new vehicle trips per day, and the safety of Boyle Road and Deschutes Road (Intersection #13) and the safety of children at local schools. The commenter also questions the differences between the average daily trips provided in Table 5.16-9 and the new vehicle trips provided in Table 5.16-8. The commenter requests a condition of approval to widen and straighten portions of Boyle Road and Old Alturas Road. The commenter also questions if the project applicant's payment of the pro-rated cost share representing 11% of the cost of upgrading the existing two-way-stop-controlled intersection to all-way-stop-controlled intersection is enough.

Regarding the proposed projects impacts to Boyle Road and Deschutes Road (Intersection #13), please refer to ***Response 4-b*** related to intersection improvements related to safety, ***Response 14-b*** for a discussion of roadway safety and determination of collision rates, and ***Responses 17-n*** and ***17-o*** for installation of warning signs to improve safety, above.

Regarding the comments related to traffic increases and school safety, the commenter is referred to preceding responses under ***Response 37-c, 43-b, 48-k*** and ***48-I***. The 11% pro-rated cost share is based upon the project's pro-rated share of the projected traffic increases through Year 2035. This 11% amount is directly proportional to the project's vehicular impact.

Regarding the commenter's request to have require Boyle Road to be widened and straightened, State *CEQA Guidelines* §15041(a) Authority to Mitigate, "A lead agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the

environment, consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards established by case law (Nollan v. California Coastal Commission (1987) 483 U.S. 825, Dolan v. City of Tigard, (1994) 512 U.S. 374, Ehrlich v. City of Culver City, (1996) 12 Cal. 4th 854.)" Accordingly, the County as the Lead Agency has required proportionate mitigation measures to reduce impacts to traffic. To require the applicant to straighten and add traffic lanes along Boyle road would not be proportionate to the impact and are therefore not appropriate.

Regarding the commenter's statements about trip generation, Table 5.16-8, PROJECT TRIP GENERATION, provides a summary of the land use and quantities (i.e., units) for the proposed project, along with corresponding ITE land use codes from which trip generation characteristics were established and analyzed. As discussed on page 5.16-15 of the Draft EIR, it is estimated that the proposed project would generate approximately 1,774 new daily trips, with 135 vehicle trips generated during the AM peak hour and 175 vehicle trips generated during the PM peak hour period. The directional trip distribution and assignment of project-generated trips were estimated based on an understanding of existing and projected future traffic flows and travel patterns within the vicinity of the proposed project site, location of local and regional housing and employment/commercial centers in relation to the propose project site, and supplemented by the use of the Shasta County Regional Travel Demand Forecast Model.

Trip distribution from the two entrances into the project site is graphically depicted in Figure 5.16-3, PROJECT TRIP DISTRIBUTION, of the Draft EIR (page 5.16-16), the traffic would be distributed along multiple roadways within the circulation network, and would not only use Boyle Road. Thus, Table 5.16-9, EXISTING PLUS PROJECT ROADWAY LEVEL OF SERVICE, provides the average daily trips that each roadway segment would accommodate assuming the existing traffic volumes and the addition of the project's estimated traffic volumes, based on the distribution of the traffic. Therefore, Boyle Road (west of Deschutes Road) would experience LOS A with 1,793 ADT, an increase of 337 ADT from the existing conditions (refer to Draft EIR Table 5.16-6, EXISTING ROADWAY LEVEL OF SERVICE). The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Regarding conditions of approval to improve safety on area roadways, please refer to preceding ***Response 5-f***. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-j: The commenter questions the priority of the improvements at Airport Road/SR-44 versus improvements on Boyle Road or at Boyle Road and Deschutes Road (Intersection #13). The commenter questions why the improvement funding would be given to the City of Redding.

Please refer to preceding responses under ***Response 13-e, 41-a,*** and ***48-w*** regarding the Airport Road/SR-44 interchange. In addition, refer to preceding responses under ***Response 57-h*** and ***57-i***, above, regarding improvements to Boyle Road and Boyle

Road and Deschutes Road (Intersection #13). Regarding a project's fair share of roadway improvements, please refer to preceding responses under ***Response 5-f, 17-p,*** and ***57-i***. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-k: The commenter requests that access to the project be made available from Deschutes Road.

The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-l: The commenter requests that the proposed project construct a bicycle lane the entire length of Boyle Road and along Deschutes Road from Boyle Road to Foothill High School, and on Old Alturas Road from the north entrance of the project site to Bella Vista Elementary School.

Please refer to preceding responses under ***Response 14-b, 17-f,*** and ***48-v*** regarding bicycle lanes. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-m: The commenter states that a condition of approval should prohibit the removal of all oak trees and riparian vegetation.

CEQA analysis should be focused on the reasonableness of the action as whole. Requiring a condition of approval to completely avoid all oak trees and riparian areas is not a reasonable condition or mitigation as it would disallow the proposed project and all evaluated alternatives, except the "No Project" Alternative. For additional discussion regarding Alternatives, the commenter is referred to ***Master Response-1***, ***Response 44-a***, and ***Response 45-a***. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-n: The commenter requests that the drilling of private wells be prohibited because BVWD needs the revenue and BVWD maintains the pipelines, valves and fire hydrants.

Please refer to ***Master Response-3*** and preceding responses under ***Response 7-d, 14-a, 15-a, 16-d***, and ***17-h***. No private wells are anticipated as a result of the proposed project. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-o: The commenter disagrees with the conclusion of the Draft EIR in regard to impacts to water quality. The commenter states that uses including keeping of domestic and farm animals, the sewage treatment plant, upset conditions, and use of grey water will impact storm water. The commenter further questions how the potential ancillary structures and project infrastructure would not seriously impact storm water

runoff. The commenter then recommends conditions of approval to include farm animal setbacks from channels, and additional storm water retention basins.

The commenter is referred to Section 5.9, HYDROLOGY AND WATER QUALITY, which as was stated in the comment, noted impacts to Hydrology and Water Quality would be *less than significant*, or *less than significant with mitigation*. The commenter states disagreement with the conclusion of the Draft EIR but does not provide comments accompanied by substantial evidence or factual support. Pursuant to State *CEQA Guidelines* §15064 an effect shall not be considered significant in the absence of substantial evidence. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-p: The commenter states that a condition of approval should require the wastewater treatment facility and any secondary disposal area be 150 feet from the development perimeter to reduce potential for odors. The footprint of the wastewater treatment plant would be between 50-200 feet from the southern project boundary. The actual treatment facility would be within this range. The nearest existing offsite structure is approximately 1,000 feet to the south of this location, which is far greater than the 150 feet requested by the commenter.

The commenter is referred to page 5.3-21 of Section 5.3, AIR QUALITY, regarding the discussion of potential odors associated with the proposed community wastewater collection and treatment system. The individual septic tanks would include carbon filters to control odors. The wastewater treatment system would be designed to meet the reuse requirements for discharge of Title 22 (Disinfected Secondary Effluent). Title 22 reuse requires daily testing for coliform and also includes provisions for odor and nuisance control. Furthermore, the project would be required to comply with SCAQMD Rule 3:16 and *California Health & Safety Code* Section 41700, which prohibits the discharge of contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. Impacts from odors were found to be *less than significant*. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-q: The commenter states that a condition of approval prohibiting any disturbance within 150 feet of Clough Creek should be included. The commenter is referred to ***Master Response-4***, which discusses open space RMA's in relation to Clough Creek, ***Response 2-b***, which discusses the roadway crossings of Clough Creek, and ***Response 10-d,*** which discusses mitigation measures that would reduce impacts to *less than significant* levels. No issue or adequacy of the Draft EIR was raised by the commenter. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-r: The commenter asks what chlorine compound will be used for wastewater treatment and requests that a condition of approval be made to prohibit chlorine gas use.

Please refer to ***Master Response-5*** and preceding responses under ***Response 13-d, 43-d,*** and ***53-f*** regarding the wastewater treatment facility. Please refer to Section 3.0, PROJECT DESCRIPTION, subheading "Wastewater" beginning on page 3-22 of the Draft EIR for a detailed description of the wastewater system and facility. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-s: The commenter raises questions regarding the grey water systems and asks who is responsible for operating of flow diversion devices and routine maintenance. The commenter asks if maintenance is required to function properly, who is responsible for the maintenance, and stated that the average homeowner does not have the ability to maintain these systems. The commenter is referred to ***Master Response-5*** and preceding ***Response 17-b***.

Regarding the commenter's questions regarding operation and maintenance, the commenter is referred to Appendix 15.2.6, TIERRA ROBLES WASTEWATER MANAGEMENT PLAN, which provides a complete description of the residential wastewater treatment system. As described in the appendix, these systems are low maintenance and are supplied with 24-hour back up storage in case of a malfunction before service is needed. Homeowner would not be expected to maintain these systems. Regarding the inability of homeowners to manage the diverter valve, as discussed on page one of Appendix 15.2.6, the homes will be constructed with a partial dual-plumbing wastewater drain system (grey water) compliant with Chapter 16 of the California Plumbing Code, which will allow the diversion. The homeowner will operate the valve to diver the water. It is reasonable to assume that homeowners will have the capacity to operate the valve to divert the water when needed. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-t: The commenter notes they did not see any discussion of regulations related to grading of driveways, residential pads, and other similar grading in relation to individual parcels. The commenter inquires as to the responsible party for enforcing these grading operations.

All grading on the project site would be required to conform to the *Shasta County Code Chapter 12.12* which promote and protect the public safety, convenience, comfort, prosperity, general welfare and the county's natural resources by establishing minimum requirements for grading, excavating and filling in order to: A. Control erosion and sedimentation and prevent damage to offsite property and streams, watercourses, and aquatic habitat; B. Avoid creation of unstable slopes or filled areas; C. Prevent impairment or destruction of potential leach fields for sewage disposal systems; and D. Regulate de facto development caused by uncontrolled grading, to reduce project impacts as the result of creating or contributing to runoff that would exceed the capacity of existing or planned storm water drainage systems.

As such, grading permits would be required and all conditions attached to any grading permit would be verified by the County. No issue or adequacy of the Draft EIR was raised by the commenter. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-u: The commenter questions the proposed use within the RMAs and open space areas, and inquires as the appropriate County agency responsible for enforcing the non-disturbance concept. The commenter notes that monitoring would be difficult and proposes to eliminate the construction of any improvements private open space areas.

As discussed on page 5.10-14 of Section 5.10, LAND USE AND PLANNING, the TRCSD, as approved by the Shasta County Local Agency Formation Commission (LAFCO), would management the resource management areas and open space. No issue or adequacy of the Draft EIR was raised by the commenter. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-v: The commenter notes that under the design guidelines there are numerous instances of the use of the word 'should' instead of 'shall.' The commenter continues stating that using 'should' is not acceptable for any site disturbance activities including grading, fencing, and other structures.

The commenter is correct that both 'should' and 'shall' are used within Section 3.0, PROJECT DESCRIPTION, to describe the design guidelines. The commenter is referred to Section 9.0, INVENTORY OF MITIGATION MEASURES. All mitigation, with the exception of Mitigation Measure (MM) 5.4-1i (in regard to the timing of surveys for elderberry bushes) and Mitigation Measure (MM) 5.2-1 which instructs that all homeowners, "should be prepared to accept…," use 'shall' as appropriate. The word 'should' is used four other times, however, in these instances it is used in the context of "should a resource be located…" No issue or adequacy of the Draft EIR was raised by the commenter. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-w: The commenter expresses opposition to the rezone and states that should the rezone be allowed, residences should be limited to the number allowed under the existing zoning.

The commenter is referred to ***Master Response-2***. No issue or adequacy of the Draft EIR was raised by the commenter. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-x: The commenter states that the Shasta County Sheriff's Department does not have capacity to respond to more than routine incidents and funding generated by the proposed project would not be adequate to promote retention of existing deputies.

The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. The commenter is referred to page 5.13-13 in Section 5.13, PUBLIC SERVICES AND UTILITIES, that states that the proposed project would bring additional annual revenue from local property and sales taxes that would offset demand for law enforcement services by funding increases in personnel, training and equipment. In addition, payment of development impact fees ($789 per single-family unit) would further offset costs. The Draft EIR concludes that impacts to law enforcement services would be *less than significant*. No change to the Draft EIR is required.

Response 57-y: The commenter states that Shasta County has a need for affordable housing. The commenter states that the project would disrupt the rural nature of the area and go a long way to turning it into an urban area, needs to be denied, would be more appropriate for the City of Redding, and asks why another project like this needs to be approved.

No issue or adequacy of the Draft EIR was raised by the commenter. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 57-z: The commenter appreciates the opportunity to comments and re-iterates the hope of the extension of the comment period.

The commenter is referred to ***Master Response-1***. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.