Letter 58 – Rebecca Final (December 26, 2017)

Rebecca Final
10708 Green Oaks Ln., Redding, CA 96003

December 26, 2017

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

Re: Proposed Tierra Robles Subdivision

Dear Mr. Hector,

This letter is to voice opposition to the 166 parcel Tierra Robles Subdivision proposed for the Boyle Rd. area of Shasta County. My comments will be simple and hopefully direct to the points that affect me and my home. 58-a

As stated in the Draft EIR, the proposed project site is located within a rural area of unincorporated Shasta County. I am immediately stuck with an obvious thought that the current residents moved to this particular area of Shasta County exactly because it is rural and of manageable parcel sizes for families. The construction of this proposed development is in exact opposition to that ideal. If the existing residents of this community wanted to live in a high density environment, that could have been achieved by purchasing in the city limits of Redding in any number of already constructed neighborhoods. 58-b

My past experince has been that population dense developments build alongside of existing rural properties with uses such as animals or crops ends up with the newer residents complaining about the noise, insects or dust created by the existing rural uses. 58-c

Another concern is that, per the EIR, build-out is anticipated over a 10 to 15 year period. Construction of the onsite residential structures is anticipated to occur over approximately 10 years. This is going to create two things. For the existing residents of the rural properties, there will be years of construction noises and road dust, OR the developed plots will remain empty inviting transients to move in. There is already an unfortunate presence of transients in our area that is leaching out from the City of Redding. 58-d

Lack of water availability in California is a crisis. Shasta County is no exception. Our water provider, Bella Vista Water District, already has reached limits that put current customers on water rationing every year and add to the increasing loss of agricultural water to larger parcels that would like to run livestock or grow crops. While BVWD is required to provide service to any new residents in their service area, that does not mean the water is there to be had. 166 homes is most certainly going to push water availability over it's already shaky limits. 58-e

I have noticed that over the last 28 years I have lived in this neighborhood, the traffic on Boyle Rd has increased to the point that leaving my road on some weekday mornings around 7:30 can be delayed by traffic. I cannot begin to imagine how a small country road like Boyle will be able to handle what will most certainly be upwards of 300 more cars potentialy on a daily basis. Pretty much every household anymore has 2 vehicles and most homes take two incomes to survive, meaning travel away from home. Therefore the increase of 300 cars a day is not an impossible number to anticipate. It is easy to imagine traffic accidents of any kind occurring on this road. The improvements necessary to handle those automobiles are not clear. 58-f

Availability of law enforcement and fire protection are other concerns. It's common knowledge that the Shasta County Sheriff's Department and Redding Fire are strapped for money and usually understaffed. Fire protection this far out of town is with a voluntary staff and Cal Fire. That lack of protection from those agencies is not going to improve in a population dense environment such as the one proposed. 58-g

I would be very curious to know the alterior motives behind requesting 1.33 acre parcels in an area that is clearly 2.5 acre minimums. Is there a hope that these parcels will be slipped in under the radar and then open up a revision of the GP allowing smaller parcel sizes? Again, refer to the fact that current homeowners and property owners WANT to be in a 2.5 acre or larger environment and did not move here to deal with high density and all that goes with it. 58-h

Finally, you should know that back in the area where this development is planned, there is a very rare white deer strain. I have seen one of the fawns on our road (Green Oaks) along with her mother. Others including the white buck have been spotted by other residents in the neighborhood who have commented on it. While they have adapted somewhat to the current human density, it's reasonable to expect that they may not be able to survive the encroachment of hundreds of more humans, and the ensuing noise, lights, sanitation and traffic. 58-i

This development is a bad idea for the tax paying, water stressed citizens in particular for this lovely, rural setting and I lodge a serious objection to it's approval for the reasons noted in this letter. 58-j

Respectfully,

Rebecca Final
10708 Green Oaks Ln
Redding, CA 96003

Response to Letter 58 – Rebecca Final

Response 58-a: The commenter notes opposition to the proposed project.

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 58-b: The commenter notes that the proposed project is in opposition to the idea that people moved to the area for the rural nature of unincorporated Shasta County.

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.

Response 58-c: The commenter states that she expects the new residents of the proposed project to result in complaints about noise, insects, and dust from rural uses.

No issue or adequacy of the Draft EIR was raised. However, the commenter is referred to Section 5.3, AIR QUALITY, Section 5.4, BIOLOGICAL RESOURCES, and Section 5.11, NOISE, of the Draft EIR regarding the analysis of the areas of concern. 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 58-d: The commenter notes that during proposed project construction noise and dust will occur. The commenter also states that if plots stay empty transients may move into the property.

With regard to noise, the commenter is referred to page 5.11-1 through 5.11-26 of the Draft EIR (Section 5.11, NOISE). This section provides a complete discussion of noise impacts of the proposed project. As discussed in Impact 5.11-1, the proposed project would implement mitigation which would limit construction related noise by limiting construction hours, requiring maintenance for equipment, maintaining a 200-foot distance from existing residences, as well as shrouding or shielding all impact tools. This would reduce impacts to *less than significant*. Noise Impacts discussed in Impacts 5.11-2 through 5.11-3, were concluded to be *less than significant* and no mitigation was required. Impact 5.11-5 on page 5.11-24 describes the cumulative noise impacts and concluded that the project would not result in significant short or long-term stationary noise impacts.

The commenter also is referred to ***Response 17-c***, which provides additional discussion of potential noise conflicts and impacts.

The commenter's concern about transients using the project site is not an issue that is considered under CEQA. State *CEQA Guidelines* §15358(b) state that effects analyzed under CEQA must be related to a physical change in the environment. Therefore, it is not appropriate for discussion in the Draft EIR.

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 58-e: 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***, and preceding ***Responses 7-a*** through ***7-p***. 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 58-f: The commenter states that the traffic on Boyle Road causes delays and does not know how it will handle the increase in vehicles and it is not clear what improvements are needed.

The commenter is correct that the proposed project would result in increased traffic. Section 5.16, TRAFFIC AND CIRCULATION, provides a complete discussion of the impacts. In reference to increases in vehicle traffic on Boyle Road, associated intersections, and mitigation to reduce impacts the commenter is referred to preceding responses under ***Response 4-b, 5-f, 13-e,*** and ***14-b*** which provide a thorough discussion of these issues. 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 58-g: The commenter states that both law enforcement and fire protection need funding and staffing. The commenter states that the lack of protection will not improve with the proposed project but does not raise an issue or question the adequacy of the Draft EIR.

The commenter is referred to preceding ***Response 51-b*** in reference to law enforcement and ***Response 37-f*** in reference to fire protection. 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 58-h: The commenter mentions that some parcels would be 1.33-acre in size but current property owners wanted to be in an area with 2.5 acres lots but does not question the adequacy of the Draft EIR.

The commenter is referred to ***Master Response-2*** for a discussion of the proposed project in relation to zoning and density. 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 58-i: The commenter appears to be referring to a couple albino deer that are reported to be within or in proximity to the project site. The commenter states it's reasonable that they may not survive due to the proposed project and additional noise, light, sanitation, and traffic.

The commenter is referred to Section 5.4, BIOLOGICAL RESOURCES, which included an analysis of impacts to wildlife including deer. During biological evaluation for the site, on three occasions, two albino deer were observed. It should be noted, although rare, albino deer are not a unique or protected species, and the albinism is caused by a recessive genetic trait. Although the commenter speculates that the proposed project may result in the incidental take of an albino deer, the deer have been seen running on-site indicating they are highly mobile and are expected to fully vacate the site and move to a less densely developed area should the on-site habitat become uninhabitable. As shown in Table 5.4-1, ANIMAL SPECIES OBSERVED, black tailed deer are not listed as special status species and the impacts discussion on page 5.4-54 of Section 5.4, BIOLOGICAL RESOURCES, found that impacts would be *less than significant*. No further response is necessary and no change to the Draft EIR is necessary.

The commenter also is referred to Section 5.1, AESTHETICS AND VISUAL RESOURCES, Section 5.11, NOISE, Section 5.16, TRAFFIC AND CIRCULATION, and Section 5.17, UTILITIES AND SERVICE SYSTEMS, for a discussion of the other issue areas mentioned.

Response 58-j: The commenter reiterates concerns by referencing the comments listed above.

The commenter is referred to ***Responses 58-a*** through ***58-i,*** above. This comment does not raise an issue or adequacy of the Draft EIR. 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 59 – Steve & Diane Davis (December 26, 2017)

Steve & Diane Davis
10733 Green Oaks Lane, Redding, California 96003

December 26, 2017

Ms. K Hunter
1450 Court Street
Redding, CA 96001

resourcemanagement@co.shasta.ca.us

Re: Proposed Tierra Robles Subdivision

Dear Ms. Hunter,

This letter is written in opposition to the proposed Tierra Robles Subdivision off of Boyle Road in the Bella Vista/Palo Cedro area. We have strong objections to the project and have written previously to Kent Hector and outlined many concerns, as have many other residents who will be affected by this project if it is approved. It is concerning that the EIR that was based on information provided by experts that were paid to offer opinions did not adequately address the concerns of the taxpayers or require mitigation by the developer. 59-a

This area has long been in the General Plan as an area that is zoned to remain rural, with lot sizes of 2.5 acres and above. If the County chooses to allow a large development in this area, the established zoning requirements should be maintained and the developers should be required establish lot sizes of 2.5 acres or greater. The current proposed plan provides for lots as small as 1.33 acres, and places the smallest lots next to established homes that are consistent with existing zoning, with lot sizes of 2.5 acres or greater. If the County chooses to amend the established zoning for the benefit of the out of area developers, the developers should be required to place the smallest lots in the interior of the development and maintain established lot sizes and zoning around the perimeter in order to mitigate the negative impact on established homes in the area. This would be a reasonable mitigation, it was raised to you in previous letters and has not been addressed, and a response to this suggestion for reasonable mitigation is required. 59-b

Having been a customer of Bella Vista Water for over 25 years, I know that the water supply is not adequate to add a development of this size. Bella Vista Water has rescinded existing agricultural water allotments for many area residents, stating that they do not have sufficient allotments to provide water for agricultural purposes. In addition, it is now known that Bella Vista Water will also have to provide service to the new Bethel Church development that has been approved. A short distance from the proposed Tierra Robles project, near Hummingbird Lane and Boyle Road, a smaller subdivision is in the works. It is my understanding that an attempt to develop a large parcel at the intersection of Old Alturas Road and Boyle Road is also underway. The serious water rationing that has taken place in recent years will continue, and during some years, annual water commitments will not be met by the federal government. Currently, we are in danger of drought and water rationing is almost certain unless rainfall comes quickly. The information in the EIR does not adequately address the impact of this development 59-c

1

on the water supply for existing homes. There is not an adequate plan identified for the water supply of the future, when many hundreds of existing vacant lots that were created in accordance with existing zoning laws decide to build, as BV Water will have to supply those homes with water as well. It is my understanding that BV Water was required by law to issue "will serve" letters for this subdivision, but the District also understands that this plan will lessen the water supply and water pressure for established homes. Please provide a detailed plan for how future water can be guaranteed for existing homes and previously established lots, given the limitations of BV Water, before approving a huge subdivision. If the County desires to approve this project, knowing the detriment that it will cause for Shasta County residents, require the developer to pay water supply mitigation fees to offset the future costs that will otherwise be unfairly borne by the taxpayers. Much of the BV Water pipes and mains are decades old. Adding pressure to the system by adding a large subdivision to this area will cause already aging equipment to fail, which will result in increased water rates to offset upgrade costs. The EIR does not address this, it does not offer mitigation plans or identify any way to prevent BV Water customers and Shasta County taxpayers from having to bear the hidden and long-term costs that this development will cause, long after the developers have made millions and moved on. The EIR must address these concerns and provide mitigation plans that reduce the impact on area residents. Please prepare an EIR addressing these concerns. Adding 160 homes to the district would create an undue burden on the water supply, jeopardize the ability of existing customers to get the water service, and have a detrimental impact on the ability of agricultural customers to pursue agricultural endeavors. Shasta County is an agricultural area, and this must be preserved. 59-c Cont. 59-d 59-e

The EIR included a traffic study that fails to address the actual impact of increased traffic on residents in the area, or the obvious safety issues and traffic collisions that a development of this size will cause. Boyle Road is a narrow, two-lane rural roadway that is not designed to handle the flow of traffic that a subdivision of this size will generate. The road is already heavily traveled at certain times of the day. There is a very narrow shoulder, with inadequate room for bicyclists or pedestrians, and the plan does not appear to require developers to install bicycle and pedestrian lanes. The plan also does not require the developer to install turn pockets or center turn lanes for the many side streets on Boyle Road. Not having turn pockets will create a safety hazard for those who travel the road. The plan does not require the developer to redesign or re-engineer the substantial curves on Boyle Road that have resulted in traffic fatalities and injuries. 59-f

The EIR states that a "roundabout" or traffic circle would handle the increased traffic at Boyle and Old Alturas, Old Alturas and Old Oregon Trail, and potentially even Deschutes Road and Boyle Road. A recent call to the Shasta County Public Works Department revealed that a traffic count at the intersection of Old Alturas Road and Boyle Road, and a traffic count at the intersection of Boyle Road and Deschutes Road has not been conducted since 2009, and at the time, Boyle Road was not the subject of the study. The EIR does not identify what facts were relied upon for the finding that was reached or what potential affect a roundabout would have on traffic flow at peak usage times. 59-g

The plan to use roundabout is a cheap and ineffective diversion that fails to address the safety of residents and the large number of students that travel through the area on a daily basis. The EIR does not identify studies that show whether these proposals would be successful and for how long. If they are inadequate, Shasta County taxpayers will have to bear the cost, as the developer will be long gone without having paid to mitigate the issues that their project will cause. 59-h

The developer plans to establish Boyle Road as the main access to the proposed subdivision. As required by law, a secondary access near Seven Lakes Road in Bella Vista. This is not an adequate plan, 59-i

2

as it concentrates most of the subdivision traffic onto Boyle Road, as residents will not use an access that takes them farther from Redding. Coupled with the failure to deal with the increased traffic on Boyle Road, this places an inappropriate and dangerous burden on citizens using Boyle Road to access their residences, schools or businesses. 59-i Cont.

The introduction of a large neighborhood into a rural area will cause an increase of criminal activity within the subdivision and in surrounding communities and neighborhoods, but the EIR does not address a plan or offer mitigation to offset the costs this will bring. Law enforcement funding is already lower than what is needed, California laws are continually releasing criminals and making citizens less safe. An increase in the crime rate will result in an increased cost to Shasta County and its taxpayers, and this is another area where an undue tax burden will be placed on the citizens of Shasta County, yet the EIR does not address this. 59-j

Installing an on-site treatment plant for wastewater, as the Tierra Robles plan outlines, will invariably result in the noxious, unhealthy and nauseating odor of human waste being carried to surrounding properties. This will have a detrimental impact on the ability of existing homeowners to enjoy and use their property to pursue their established way of life, and it negatively impacts property values for existing homes. In addition, this above-ground pool of cess will become a county assessment district, which means that citizens of Shasta County, including those that do not live in this subdivision, will be forced to pay taxes that will be used to operate and maintain the system. The Tierra Robles project does not provide funding for the system repairs in the future, and the EIR does not address the future impact of the system. The long range funding of the system must be addressed and information about the future impact on Shasta County taxpayers must be provided. 59-k

This area has been the habitat of a rare strain of white or piebald black-tailed deer, a strain that reportedly occurs in less than one percent of the deer population. The area where the subdivision is proposed is the habitat for these creatures, which are occasionally observed by area residents. This subdivision would destroy the habitat of all wildlife and wipe out the existence of the rare treasure of the white deer. Despite raising this concern to you previously, it does not appear to have been addressed in the EIR, nor has anyone conducting the EIR requested additional information regarding the rare strain of deer. 59-l

Shasta County residents benefit when developments are carefully planned, environmentally sound, and implemented in a moderate manner that is consistent with the zoning for the community. A new development should not harm the way of life for existing residents, financially overwhelm local government or leave Shasta County taxpayers to inherit the financial burden caused by the need to enhance infrastructure, roads, fire, schools and public safety, while non-resident investors and developers make their money, take it back to Beverly Hills and move on to another area. 59-m

Sincerely,

Steve Davis

3

Response to Letter 59 – Steve & Diane Davis

Response 59-a: The commenter states opposition to the proposed project, and is concerned that the Draft EIR is based on opinions of paid experts and that it did not adequately address concerns and the reports did not require mitigation.

In order to fulfill the basic purpose of CEQA as detailed in State *CEQA Guidelines* §15002, technical reports prepared by experts are needed to inform decision makers of potential environmental consequences and identify mitigation measures to reduce 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 59-b: The commenter discusses the density of the proposed development and comments that the smaller lots, 1.33 acres, should be planned for the interior of the lot as mitigation for the surrounding homes.

The commenter is referred to ***Master Response-2***. In addition, the commenter is referred to Section 7.0, ALTERNATIVES TO THE PROPOSED PROJECT, which discusses in detail, all the alternatives evaluated. This includes the "Clustered 3-Acre Parcels" Alternative, which describes a project with 166 3-acre parcels. Page 7-10 in Section 7.0, ALTERNATIVES, found that this alternative would result in greater construction-related impacts related to air quality (increased grading) and overall greater impacts to onsite oak woodlands and Grazing Land as the amount of preservation achieved through permanent open space dedication would be less when compared to that of the proposed project. In addition, this alternative does not fully meet several key Project Objectives. 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 59-c: The commenter states that the water supply is not adequate to supply the proposed project and other uses served by Bella Vista Water District (BVWD). The commenter states that the information in the Draft EIR does not adequately address project impacts and there is not an adequate plan identified for future water supply.

The commenter is referred to ***Master Response-3*** and preceding responses under ***Response 7-b, 7-e,*** and ***7-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 59-d: The commenter mentions that BVWD was required to provide "will serve" letters but the project would reduce water supplies and water pressure. The commenter requests a detailed plan for future water supply, and requests water supply mitigation fees. The commenter notes that BVWD pipes are decades old and that increased pressure would cause failure, which is not addressed by the Draft EIR and mitigation is not provided and it should.

The commenter is referred to ***Master Response-3*** and preceding ***Responses 7-a*** through ***7-p***. As explained, the project applicant and the County will work with BVWD

to provide the details needed to satisfy necessary BVWD infrastructure improvements, water supply, and service requirements prior to BVWD initiating any potable water service. Regarding water supply mitigation fees, the applicant is referred to page Impact 5.17-4 beginning on page 5.17-23 and ending on page 5.17-31. With the incorporation of Mitigation Measure (MM) 5.17-4a requiring written verification of conformance to water efficiency design standards, and Mitigation Measure (MM) 5.17-4b, which requires the applicant to provide alternate supplies during periods of water shortage, impacts were found to be *less than significant*. In addition, the commenter is referred to preceding ***Response 17-g*** related to water pressure. 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 59-e: The commenter reiterates comments regarding water supply.

The commenter is referred to ***Master Response-3*** and ***Responses 59-c*** and ***59-d***, 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 59-f: The commenter questions the Traffic Impact Study's analysis regarding increased traffic volumes, roadway safety, vehicle collisions, bicycle and pedestrian safety, the lack of turn pocket or center dual left-turn lanes, and the dangerous existing curves on Boyle Road.

Issues raised by the commenter have been previously discussed and addressed in the following responses that precede this comment letter: ***Response 4-b, 5-f, 13-e, 14-b, 17-f, 17-n, 17-o, 17-p, 32-b, 35-c, 37-c, 40-a, 41-a, 43-b, 47-c, 48-i, 48-k, 48-o, 48-p, 48-q, 48-w, 49-b, 50-b, 54-f,*** **and** ***57-i*** address project-related traffic impacts, safety, and mitigation. 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 59-g: The commenter questions the impact of the mitigation measures at area intersections, especially the installation of stop controls or roundabouts and questions the data used to identify traffic impacts.

Issues raised by the commenter have been previously discussed and addressed in the following responses that precede this comment letter: ***Response 4-b, 5-f, 13-e, 14-b, 17-f, 17-n, 17-o, 17-p, 32-b, 35-c, 37-c, 40-a, 41-a, 43-b, 47-c, 48-i, 48-k, 48-o, 48-p, 48-q, 48-w, 49-b, 50-b, 54-f,*** **and** ***57-i*** address project-related traffic impacts, safety, and mitigation.

With respect to the traffic data, Section 5.16, TRAFFIC AND CIRCULATION, and Appendix 15.9, TRAFFIC IMPACT STUDY, of the Draft EIR, did not use county data to determine trip generation and distribution, but rather empirical data collected as part of the project analysis for roadway segments and intersections. 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 59-h: The commenter states that roundabouts are cheap and ineffective and the Draft EIR does not identify the studies that show if they will be successful.

Issues raised by the commenter have been previously discussed and addressed in the following responses that precede this comment letter: ***Response 4-b, 5-f, 13-e, 14-b, 17-f, 17-n, 17-o, 17-p, 32-b, 35-c, 37-c, 40-a, 41-a, 43-b, 47-c, 48-i, 48-k, 48-o, 48-p, 48-q, 48-w, 49-b, 50-b, 54-f,*** **and** ***57-i*** address project-related traffic impacts, safety, and mitigation.

The commenter is also referred to Section 5.16 TRAFFIC AND CIRCULATION, which concluded that impacts to traffic and circulation, with the use of roundabouts for mitigation, would *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 59-i: The commenter states that the main access to the project site will be from Boyle Road; however, a secondary access is located near Seven Lakes Road. The commenter expresses concern that this concentrates traffic onto Boyle Road creating an inappropriate and dangerous traffic environment for the existing County residents.

Issues raised by the commenter have been previously discussed and addressed in the following responses that precede this comment letter: ***Response 4-b, 5-f, 13-e, 14-b, 17-f, 17-n, 17-o, 17-p, 32-b, 35-c, 37-c, 40-a, 41-a, 43-b, 47-c, 48-i, 48-k, 48-o, 48-p, 48-q, 48-w, 49-b, 50-b, 54-f,*** **and** ***57-i*** address project-related traffic impacts, safety, and mitigation. 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 59-j: The commenter states that the proposed project would result in increased criminal activity and states that the Draft EIR does not address or mitigate the impacts associated with an increase in crime.

The commenter is referred to Section 5.13, PUBLIC SERVICES AND FISCAL IMPACTS. As noted on page 5.13-13, 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 offset 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 59-k: The commenter states that the onsite waste water treatment plant would result in odors and have a detrimental impact on homeowners. The commenter speculates that the cost would eventually be borne by non-project residents.

The commenter is referred to ***Master Response-5*** and preceding responses under ***Response 13-d, 17-b, 17-j***, and ***53-f***. 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.

Regarding funding, the commenter 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 59-l: The commenter states that the project area has been habitat for the white or piebald black tailed deer but this was not addressed in the Draft EIR.

The commenter is referred to Section 5.4, BIOLOGICAL RESOURCES, and Appendix 15.4, BIOLOGICAL RESOURCES DOCUMENTATION, of the Draft EIR, which notes that on three occasions, during field work, two albino deer were noted on the project site, not biebald deer. The commenter is referred to preceding ***Response 58-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 59-m: The commenter states that Shasta County residents benefit from carefully planned and environmentally sound development and that a new development should not harm the existing community, way of life, public services, or cause financial hardship.

No issue or adequacy of the Draft EIR was raised by the commenter; however, please refer to ***Master Response-2*** regarding the character of the area. 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 60 – Mr. & Mrs. Ronald F. Cibard (December 22, 2017)

RECEIVED
DEC 28 2017
County of Shasta
Building Division

Mr + Mrs Ronald F. Cibard
11397 Eden Dr.
Redding, CA 96003
530-549-3361 - Dec 22, 2017

Subject: Tierra Robles Development

Kent Hector

Our family moved to 11397 Eden Drive on the year 1972. We moved to this location because the parcels were 5 acres and above, plus it was a Agricultural Districk. We wanted the Rural country environment for our family. It is quiet and is for the most part crime free. Our children learned how to work and enjoy country life. These are the main reasons we oppose the Tierra Robles Development. 60-a

Other concerns:

(1) In all the years we have lived here, only two small sections of Old Alturas Road have been inpaved between Old Oregon Trail Road and Deschutes Road. Two 90° turns exist with the signs getting run down by speeding autos, consistantbly. 60-b

In the past plans were made to build a Church south of our location and it was scratched because of the traffic congestion it would

Years latter as you know, law Enforcement wanted to use the Gun Club locations for training. And that was scratched also 60-b Cont.

(2) Old Alturas Road is so narrow that biking tours had to pick another rout do to the lack of Safely. This road is not even safe to walk on the side. 60-c

Trafic entering or exiting Old Alturas is not safe on the down hill grade and more traffic would only increase the potential for death.

(3) Wildlife habitat would be destroyed for Deer, Quail, Rabits, Geese, etc. CA. Fish and Wildlife law states that it is unlawfull to harass wildlife. This development would not only harass the wildlife population, it would also destroy it. 60-d

The entrance to the development enters off of Old Alturas road at the seasonal stream bed where wildlife travel. This is also on a 90° turn.

(4) Every time a new development is established near a Gun Club it is 60-e

not be permitted. We are losing our Freedoms. 60-e Cont.

(5) We have lost our AG water because of the lack of it. We also have no lawns because of the water cuts and price. And it is possible even less water in the future. We have lost our investment putting water systems in we can't use. 60-f

"NO" - We do not want this development. We do not have enough water.

(6) And what kind of prolem is the sewage going to be for us in the future? 60-g

(7) We are extreamly upset when someone that has 5 acres or more parcels is alowed to split that property and sell it and move. In turn changes our way of life. 60-h

And we are even more angry when Developers that live South of us are allowed to split large sections of land in Rural areas for profit. They care less about our way of life.

(8) And if this prodjeck is aproved just because it would provide more tax revenew for the County, then that would be a betrayal to the people who live here. 60-i

* So - we plead with you to do the right thing and stop this Development of Tierra Roble for the good of our Community. 60-j
Put yourselves in our place.

Sincerely:

Ron + Sylvia Guibert

Response to Letter 60 – Mr. & Mrs. Ronald F. Cibard

Response 60-a: The commenter discusses the reasons for moving to the area, which included the 5-acre lots, the agricultural district, and the rural nature of the area.

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 60-b: The commenter discusses past planning efforts and improvements for Old Alturas Road, and discusses plans for a church building, uses of the gun club and the other improvements that didn't occur.

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 60-c: The commenter states that Old Alturas Road is too narrow and is unsafe for cycling. The commenter states that traffic entering Old Alturas Road is not safe and more traffic increases the potential for death.

Although this comment does not raise an issue of adequacy of the Draft EIR, the commenter is referred to receding ***Response 14-b***, regarding pedestrian, bicycle, and motorized vehicle safety related to Old Alturas 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 60-d: The commenter states that the proposed project would destroy wildlife habitat and would harass wildlife, and is a seasonal stream used by wildlife at the entrance off Old Alturas Road.

Although this comment does not raise an issue of adequacy of the Draft EIR, the commenter is referred to preceding responses under ***Response 3-b, 3-c,*** and ***3-g*** which provides discussion of wildlife habitat, preservation of habitat, and function of the Resource Management Areas (RMA) to preserve habitat. The commenter also is referred to ***Master Response-4*** which also describes habitat protection measures***.*** In addition, the commenter references the stream bed off Old Alturas Road. The commenter is referred to preceding ***Response 2-b*** which discusses the project design feature that would avoid impacts to the stream channel. 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 60-e: The commenter makes a statement about properly permitting developments near gun clubs and loss of freedoms.

The commenter is referred to preceding ***Responses 17-s*** and ***40-d***, which describe the disclosure statement that new residents must sign acknowledging the presence of the Redding Gun Club. In addition, this response also discusses the noise impacts which is a common complain of residences near gun clubs and shooting ranges. The commenter is also referred to Section 5.11, NOISE, of the Draft EIR for additional 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 and no change to the Draft EIR is necessary.

Response 60-f: The commenter makes statements about the lack of water and how it has affected them and states they do not want the project but does not raise an issue of adequacy regarding the Draft EIR.

The commenter is referred to ***Master Response-3*** and preceding ***Responses 7-a*** through ***7-p***. As explained, the project applicant and the County will work with BVWD to provide the details needed to satisfy necessary BVWD infrastructure improvements, water supply, and service requirements prior to BVWD initiating any potable water service. The comment 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 60-g: The commenter asks a non-specific question about sewage.

The commenter is referred to ***Master Response-5*** regarding the proposed wastewater treatment 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 60-h: The commenter relates anger at the subdividing of both small and large pieces of property that detract from the rural character of the land.

The commenter is referred to ***Master Response-2*** which provides information on the zoning densities and planning of the proposed project. In addition, 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 applicant *General Plan* Objectives and Policies. 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 60-i: The commenter states that if the project is approved to generate more tax revenue it would be a betrayal to the people.

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 60-j: The commenter requests the project be stopped.

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.

Letter 61 – George and Janice Smith (December 26, 2017)

RECEIVED
DEC 28 2017
County of Shasta
Public Works Division

12-26-17

Dept of Resource Management, Planning Div.
I am writing in response to the Tierra Robles development project east of Redding. My wife and I live on Northgate Dr. Water seems to be a big issue now a days, We are NOT in favor of the project due to the water issue, this year the water issue looks to be a little on the scarce side as it was just a few years ago. Lack of water is a big big issue, We disagree with the Tierra Robles site, at this time. 61-a

I am not concerned that there will not be an odor coming from there septic system. We here are prone to lots of wind. 61-b

700 acres is a lot of land that the deer, coyotes, turkey, and many other species of wild life live, where will they go? 61-c

Our immediat issue is water or lack of. We hope you will give this project an No vote until this issue has been resolved 61-d

Thank you
Mary & Janice Smith

Response to Letter 61 – George and Janice Smith

Response 61-a: 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***. 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 61-b: The commenter is concerned that there will be odors coming from the septic systems.

The commenter is referred to ***Master Response-5*** and preceding responses under ***Response 13-d, 17-b,*** and ***17-j*** regarding the odors from the proposed wastewater treatment facility. In addition, the commenter is referred to page 5.17-20 of Section 5.17, UTILITIES AND SERVICE SYSTEMS, which notes all individual septic tanks would be watertight and oversized to provide emergency storage capacity and additional treatment capacity. 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 61-c: The commenter raises concerns about the wildlife on the project site and their ultimate displacement.

The commenter is referred to page 5.4-54 of Section 5.4, BIOLOGICAL RESOURCES. This page states, "Deer and other large mammals likely utilize the proposed project site in its current state to some degree. In most areas, the site provides sufficient cover for deer and other large mammals and the interior of the site is subject to minimal to no noise and lights from adjacent roadways and other human activity. The onsite streams and ponds also provide a mostly seasonal water source for deer and other large mammals. Following development, the proposed project site has a higher potential to be used by smaller mammals such as raccoons and striped skunks, particularly if denning habitat is available nearby. Both of these species are highly adapted to human activity. Although an occasional road kill can be expected, these species generally thrive in developed areas. Impacts are considered *less than significant*. No mitigation measures are warranted." No further response is necessary.

Response 61-d: The commenter reiterates concerns regarding water supply.

The commenter is referred to ***Master Response-3***. 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 62 – Amy Allen (December 27, 2017)

Kimberly Hunter

From: Resource Management
Sent: Wednesday, December 27, 2017 8:22 AM
To: Kimberly Hunter
Subject: FW: Tierra Robles Opposition

-----Original Message-----
From: Amy Allen [mailto:aeldred25@msn.com]
Sent: Sunday, December 24, 2017 2:55 PM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: Tierra Robles Opposition

The reason why my family, and many like mine, have been responsible with our money and saved to purchase a house in the Palo Cedro area is because we wanted to be away from overpopulated areas and everything that comes with living in those areas (lack of natural resources, less wide open spaces, houses all looking the same, people congested into a single area, traffic, crime etc..).

In the name of greed and misconstrued capitalism, this subdivision is being built. 62-a

If the people of Palo Cedro and Bella Vista wanted to live in a more populated area, they'd have done so. But we didn't because this isn't what we want.

We must not ignore the wishes of many simply to satiate investors whose only goal is to make money, even at the cost of quality of life for everyone around them.

Amy Allen

1

Response to Letter 62 – Amy Allen

Response 62-a: The commenter notes that she wanted to be away from populated areas and that the project is being built for greed and investors wanting to make money.

No issue or adequacy of the Draft EIR was raised by the commenter. The commenter is referred to ***Master Response-2*** which provides information on the zoning densities and planning of the proposed project. In addition, 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 applicant *General Plan* Objectives and Policies. 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.

Letter 63 – Linda Welch (December 27, 2017)

Kimberly Hunter

From: Resource Management
Sent: Wednesday, December 27, 2017 2:38 PM
To: Kimberly Hunter
Subject: FW: 166 homes

Good Afternoon Kim,

63-a

I replied to Dan's email asking that he specify which project he is referencing below. Unfortunately the email was returned as undeliverable, I am forwarding this to you and will try to contact him again.
Thank you,

Fae Koen
Office Assistant II, Building Division
1855 Placer Street
Redding, CA 96001
SHASTA COUNTY DEPARTMENT OF RESOURCE MANAGEMENT
Phone: (530) 225-5761
Fax: (530) 245-6468

From: Dan Welch [mailto:dddwelch@earthlink.net]
Sent: Wednesday, December 27, 2017 1:35 PM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: 166 homes

63-b

You are making such a big mistake if you change the zoning to approve these homes. There are plenty of projects already started that have not filled up or even come close in this are already, the homes behind Junction School come to mind. I am sure everyone who has responded have had the same concerns that I do, water or lack of water in a drought year, sewage concerns, traffic, and noise.
Just a couple of new homes have gone up around where I live in the last few years and the noise level has increased, can you imagine what a difference 166 homes would make?
There are many reasons I would not like to see this project happen, the list could go on forever but just know that I am one that is **against** it.
Let's not forget about the wildlife that would be displaced also.

Thank you for your time.

Linda Welch
10075 Rocking Horse Lane
Redding ca

1

Response to Letter 63 – Linda Welch

Response 63-a: The County received a comment but it did not specify a particular project. Based on the description, however, it is assumed that the comment was in reference to the proposed Tierra Robles Planned Development Project (Z10-002/TM 1996). Therefore, the comment is addressed in ***Response 63-b***, immediately below.

Response 63-b: The commenter states that the zoning change is a mistake and raises concerns about other projects, water supply, sewage, traffic, and specifically noise from the 166 units.

No issue or adequacy of the Draft EIR was raised by the commenter. The Lead Agency analyzed 18 resource topics within the Draft EIR, including impacts related to water and wastewater, traffic, and noise. These resources are analyzed in Section 5.9, HYDROLOGY AND WATER QUALITY, Section 5.11, NOISE, Section 5.13, PUBLIC SERVICES AND FISCAL IMPACTS, Section 5.16, TRAFFIC AND CIRCULATION, and Section 5.17, UTILITIES AND SERVICE SYSTEMS, of the Draft EIR. In addition, technical details and analyses, as well as resource management plans, are provided in Appendix 15.2, TIERRA ROBLES COMMUNITY SERVICES DISTRICT, Appendix 15.6, PRELIMINARY HYDROLOGY ANALYSIS, Appendix 15.7, NOISE DATA, Appendix 15.9, TRAFFIC IMPACT STUDY, and Appendix 15.10, WATER DEMAND EVALUATION, of the Draft EIR. For further discussion on zoning, the commenter is referred to ***Master Response-2*****.** For further information regarding water supply, the commenter is referred to ***Master Response-3.*** 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.

Letter 64 – Kathy Creasey (December 27, 2017)

KATHY CREASEY

RECEIVED
DEC 27 2017
County of Shasta
Permit Counter
12:51

10490 Maddelein Lane
Palo Cedro, Ca. 96073

December 26, 2017

Kent Hector
Senior Planner Shasta Co. Dept. of Resource Management
Planing Division
1855 Placer Street 103, Redding, Ca. 96001

Dear Mr. Hector;

I would like to add my voice in opposition to the proposed Tierra Robles Planned Development. I have lived here going on 6 years now and moved to this area of Shasta Co. for the purpose of its' rural environment. We enjoy the peace and quiet and star gazing in the evenings. According to Shasta County's own definition of the purpose of its Zoning Plan is to

" Promote and protect the public heath, safety, peace, morals , comfort, convenience and general welfare."

The Shasta County General Plan defines its function

" To provide a policy framework that must be reflected in the zoning ordinance, specific plans, and other development guidelines."

64-a

This development contradicts both of these objectives. By the EIR's own admission it would "significantly impact" greenhouse gases and noise pollution. This is a very large development for this rural area, and the continuous construction taking place throughout the years would produce dust, diesel fumes, noise and traffic.

64-b

I find it hard to understand how, he with the deepest pocket can come into our area, change zoning laws and change the community forever, and not for the better. We choose to live in this area for it rural environment, for the quiet, and the space between neighbors. The Tierra Robles Development ruins all of these qualities that add to pleasure of living here.

64-c

The EIR is flawed in its' water consumption figures. It states that water usage per person, per household is at 55 gallons. This is incorrect and under estimates its actual true numbers of usage. According to the USGS survey dated December 2016, average usage of water is 80-100 gallons per day, per person. This includes flushing toilets, laundry, and bathing. What it does not take into account is the 110 degree days we have in the summers here. Surely the water usage increases then.

64-d

Evan the most drought resistant plants require irrigation in those temperatures. As you recall, last summer we had no less than 70 continuous days of 100 degrees and higher. 64-d Cont.

Based on the figures given in the EIR, and they are underestimating actual water consumption, how does this then figure into their waste water facility? If more water is being consumed, then we can reasonably assume that more gallons of effluent are produced than stated in the EIR. This would render their waste water facility inadequate to handle the actual flow, resulting in possible environmental issues and fines from California State Water Resources Control Board. Remember too, that this development provides for "accessory units "on the lots. This will increase the proposed population, traffic, water consumption and effluent. The number of homeowners that would add an accessory unit is really unknown. 64-e

I have enclosed a media release from the California Water Board, Dated July 6, 2016 of further evidence of increased water usage than stated in the EIR. These figures are more current. They also recommend that water suppliers demonstrate that they have sufficient supplies to withstand three continuous drought years. This would be a prudent step for BVWD to ensure adequate water for this development. 64-f

One can question the need for this Development. These houses being built are very large. The average square footage being 3,550. This is a very large home to heat and maintain when being powered mostly by PG and E. Even with partial solar being offered, they will be expensive on a monthly basis to support. Add that cost to the additional taxes imposed as a Community District, Bella Vista water hook up, Bella Vista district tax, the inconvenience of supporting and adhering to a Community District Board, along with knowing you are going to have water restrictions continuously, how attractive are these homes going to be to buyers? 64-g

Palo Cedro Oak Estates has been in existence for over 12 years, they have 41 lots available to build on. These are large luxury homes within walking distance to a school and downtown Palo Cedro. They have built all of 5 homes in 12 years. This development does not have near the issues Tierra Robles has. Phase 1 of Tierra Robles development shows the homes being built closest to Boyle Road. I think it's fair to say these would not be the most desirable lots. They are smaller and will suffer the noise of Boyle Road. What if they don't sell as anticipated? This is a very real concern. Who will be responsible for the waste water facility, bridges, roads, bike paths, and management of the open space? Is Shasta County ready to take 64-h

fiscal responsibility for all of this? These smaller community districts are notorious for not being self-sustaining. Look at Jones Valley and Castella. 64-h Cont.

The EIR states there will be significant impact of noise and air pollution which is based on short term construction. However this construction could take place over a number of years depending on the sale of the Phase 1 homes of 46 lots. 64-i

I respectively request that Shasta County keep the existing zoning in place and allow the developer to built within those parameters. This will decrease water usage, traffic, noise, eliminate the need for a waste water facility and stay within the blueprint of a rural community and the intensions of the Shasta County General Plan. 64-j

Kathy Creasey

CALIFORNIA Water Boards

Media Release

Statewide Water Conservation Grows to 28 Percent in May; Urban Water Suppliers 'Stress Test' Data Under Review

FOR IMMEDIATE RELEASE
July 6, 2016

Contact: George Kostyrko
george.kostyrko@waterboards.ca.gov

SACRAMENTO – The State Water Resources Control Board announced today that Californians reduced residential water use by 28 percent in May, compared with the same month in 2013. Cumulatively, local water suppliers have saved 1.6 million acre feet in the 12 months since mandatory conservation goals began – enough water to supply eight million people for a year.

"The phenomenal ongoing water conservation by state residents as we enter the hottest summer months clearly shows Californians understand we remain in stubborn drought conditions statewide and that saving water is just the smart thing to do," said State Water Board Chair Felicia Marcus.

"Rain or shine, drought or no drought, state mandated target or not, Californians should keep conserving. While conditions improved for urban California's water supply with the rain and snow we got last year, we are still largely in drought and saving water can extend urban water supplies off into the future if this next winter is dry again." 64-k

Although new regulations taking effect in June give local water suppliers more autonomy to set their own conservation goals based on local supply conditions, the State Water Board said it expects suppliers to continue to make water conservation a top priority as California enters the summer months, when the opportunity for water savings is greatest.

Despite near average rainfall in much of Northern California this past winter, 60 percent of the state remains in severe or extreme drought. Groundwater basins and many reservoirs are badly depleted as the state's drought grinds into a fifth year.

May Conservation Data

- Statewide water savings for May 2016 was 28.2 percent (176,947 acre feet or 57.7 billion gallons), an increase from April 2016's savings of 26.1 percent. See fact sheet here.

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
STATE WATER RESOURCES CONTROL BOARD
1001 I Street, Sacramento, CA 95814 • Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 • www.waterboards.ca.gov

Water Boards **Media Release**

- Cumulatively, the statewide percent reduction for the twelve months from June 2015 to May 2016 was 24.5 percent, which equates to 1,609,532 acre-feet (524.5 billion gallons).
- The level of compliance also increased in May 2016, with 72 percent of suppliers meeting or within one percentage point of their conservation standards and 16 percent within five percentage points of the conservation standard.
- Statewide, average per capita water use (residential gallons per capita per day, or R-GPCD) for May 2016 was 86.8 gallons; up from 77 R-GPCD in April 2016 but below 87.6 R-GPCD reported for May 2015. All May data can be found on this page.

Revised Emergency Regulations

Starting in June, the State Water Board's recently updated emergency water conservation regulations give urban water agencies the ability to set their own conservation standards based on a "stress test" of supply reliability. Water suppliers must demonstrate that they have sufficient supplies to withstand three years of continuous drought or take additional measures that include mandatory conservation targets. The regulation is in effect through January 2017.

64-k Cont.

The deadline to submit the "stress test" results and three-year resiliency plans was June 22. While most urban water suppliers and wholesale water providers have submitted materials, the State Water Board staff is following up with a number of suppliers whose submissions appear incomplete or unclear. Once all of the submissions have been received and are complete, the State Water Board will make them publicly available.

While water suppliers may calculate lower conservation targets, the State Water Board expects that they will continue to promote and achieve water conservation and enforce prohibitions on wasting water first enacted in July 2014. Moreover, the Board is prepared to come back in early 2017 to develop new mandatory water restrictions if needed.

Permanent Ban on Wasting Water

The recently adopted regulation is part of a wider effort to build on short-term, emergency water restrictions to establish permanent conservation measures that improve long-term drought preparedness and eliminate the worst water-wasting practices. These actions will help achieve a top priority of the state's Water Action Plan: to "Make Conservation a California Way of Life."

In May, Governor Edmund G. Brown Jr. issued an executive order calling for new permanent water use efficiency targets for each urban water supplier and for strengthening local Water Shortage Contingency Plans. The local "stress test" data and three-year resiliency plans collected by the State Water Board will serve as a bridge to these actions and inform the development of new water use efficiency targets,

Water Boards

Media Release

The State Water Board regulation also continues the statewide ban on specific wasteful uses, such as hosing off sidewalks, driveways and other hardscapes; washing cars with hoses not equipped with a shut-off nozzle; and watering lawns in a manner that causes runoff. Prohibitions also remain against homeowners associations or local governments taking action against homeowners who reduce or stop watering lawns.

Background

In his April 1, 2015 Executive Order, Gov. Edmund G. Brown Jr. mandated a 25 percent water use reduction by users of urban water supplies across California. In May 2015, the State Water Board adopted an emergency regulation requiring a 25 percent reduction in overall potable urban water use statewide from June 2015 through February 2016.

On Feb. 2, 2016, based on Gov. Brown's November 2015 Executive Order, the State Water Board approved an updated and extended emergency regulation. The extended regulation responded to calls for continuing the conservation structure that had spurred such dramatic savings while providing greater consideration of some factors that influence water use: climate, population growth and significant investments in new local, drought-resilient water supplies such as wastewater reuse and desalination.

64-k Cont.

On May 9, 2016, Governor Edmund G. Brown Jr. issued Executive Order B-37-16, requiring the Board to adjust its emergency water conservation regulation through the end of January 2017 in recognition of the differing water supply conditions across the state and, separately, take action to make some of the requirements of the regulation permanent. The Board adopted the revised regulation on May 18.

Since June 2014, the State Water Board has been tracking water conservation for each of the state's larger urban water suppliers (those with more than 3,000 connections) on a monthly basis. Compliance with individual water supplier conservation requirements is based on cumulative savings. Cumulative tracking means that conservation savings will be added together from one month to the next and compared to the amount of water used during the same months in 2013.

California has been dealing with the effects of an unprecedented drought. To learn about all the actions the state has taken to manage our water system and cope with the impacts of the drought, visit Drought.CA.Gov. Every Californian should take steps to conserve water. Find out how at SaveOurWater.com. While saving water, it is important to properly water trees. Find out how at www.saveourwater.com/trees. In addition to many effective local programs, state-funded turf removal and toilet replacement rebates are also available. Information and rebate applications can be found at: www.saveourwaterrebates.com/.

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File photo taken March 29, 2015 shows a field being watered in Kern County, the nation's number 2 crop county, near Bakersfield.
Frederic J. Brown/AFP/Getty Images

Emily Guerin | September 7, 2016

Listen to story

00:58
Download this story 0.0MB

New data out Wednesday show Californians used 15 percent more water this July than the same time last year, continuing a trend that began in June when state officials backed away from mandatory water conservation targets.

While state officials seem unfazed by the increase, others worry it means Californians aren't taking the drought as seriously as before.

In June, the State Water Resources Control Board ended nearly a year of unprecedented mandatory water conservation across the state. In spring 2015, Governor Jerry Brown asked for a statewide cut of 25 percent. To get there, every water agency would be given a percent reduction target to hit.

64-k
Cont.

But after a wet winter filled reservoirs in Northern California, the board decided to lighten its grip on water agencies. Instead of telling them how much to cut back, the board made them prove they had enough water to make it through three more dry years and not run out of supply. If they could do that, they wouldn't be required to continue saving water.

More than 80 percent of water agencies in California (343 out of 411) say they passed that test.

Since then, water use in California has been increasing. Californians used an average of 105 gallons per person per day in June 2016, the first month without mandatory conservation. In July, it rose to 114 gallons per person.

Compare that to summer 2015, under mandatory conservation, when per capita use held steady in June and July at 98 gallons per person per day.

See how every individual California water district did below.

Despite the increase, Steven Moore, who sits on the State Water Resources Control Board, praised Californians for their continued conservation. He said there has been a culture change since summer 2013 when Californians were using upwards of 140 gallons per person per day. He said conservation is now a way of life, and residents are "still recognizing there's a drought."

There's a big difference between having conservation be a way of life, and declaring a water emergency, said Ellen Hanak, director of water policy at the Public Policy Institute of California. When Gov. Brown declared statewide mandatory conservation in 2015, that was an emergency. Now Hanak said things are shifting to more of a permanent, long-term change in how much water we use.

"Last year there was probably some belt-tightening that was more of the emergency nature that we could ease up on some, and I think that's what you're seeing this summer," Hanak said.

But Darron Poulsen wishes the belt-tightening would continue. He's Pomona's director of water and wastewater operations, and his customers are using around 15 percent more water than they did last July – just like Californians as a whole.

"I don't think that's OK," he said. "I would've like to see the number lower. There should be continued messaging on this. This is only the start of a new norm of what droughts are going to be like in the future."

Still, Poulsen let Pomona residents go back to watering their lawn three days a week this summer, up from just one last year – just like many neighboring water agencies.

"I think Californians like their green grass, and like their green landscaping," he said. "When the opportunity arises to not have be it as restrictive and not as mandatory, people fall back into old water habits."

Environment

Is California water use increasing?

About | New window (http://projects.scpr.org/applications/monthly-water-use/region/south-coast)

Home (http://projects.scpr.org/applications/monthly-water-use/) / South Coast

Choose a water supplier

-- Select a South Coast agency --

About the data: These charts show the daily per capita residential water use rate in California as calculated by the State Water Resources Control Board (http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/ws_tools/guidance_estimate_re The charts cover the August 2017 reporting period, and are compared to the previous month unless specified. Since the per capita measure (which reflects gallons of water used per resident per day) does not take into account rainfall, temperature, humidity and population density, the State Water Resources Control Board discourages comparisons between water suppliers.

South Coast (http://projects.scpr.org/applications/monthly-water-use/region/south-coast/)

Daily per capita residential water use decreased in August 2017 to an average of 65.87 gallons for the 173 agencies in the South Coast (../monthly-water-use/region/south-coast) hydrologic region. That number is compared to the July 2017 daily per capita residential water use of 69.63.
Use the chart below to see how the 173 agencies in this region performed.
Click here (http://projects.scpr.org/applications/monthly-water-use/region/south-coast/enforcement-comparison/) to see enforcement statistics for water agencies in this region.

64-k
Cont.

Response to Letter 64 – Kathy Creasey

Response 64-a: The commenter voices opposition to the proposed project citing the areas existing rural environment, peace and quiet, and star gazing. The commenter states that the proposed project is not consistent with and contradicts the purpose of the Shasta County *Zoning Plan* and *General Plan* and implies it would impact these things. The commenter states that because the proposed project would result in a significant impact to noise and greenhouse gas emissions, the proposed project is in conflict with the *General Plan* and *Zoning Plan*.

Outside of these statements, however, the commenter does not provide facts or evidence to support this position but restates one conclusion in the Draft EIR and misstates a second. Pursuant to the State *CEQA Guidelines*, an effect is not considered significant in the absence of substantial evidence; therefore, comments should be accompanied by factual support. Section 15204(c) of the State *CEQA Guidelines* states:

> "Reviewers should explain the basis for their comments, and, should submit data or references offering facts, reasonable assumptions based on facts. Or expert opinion supported by facts in support of the comments. Pursuant to §15064 an effect shall not be considered significant in the absence of substantial evidence."

It should be noted, that Section 5.11, NOISE, of the Draft EIR found that noise impacts would be *less than significant* or *less than significant with mitigation* incorporated, contrary to the comment. The commenter is correct, however, that the Draft EIR discloses that impacts associated with greenhouse gas emissions would be *significant and unavoidable*.

The commenter is referred to ***Master Response-2***, which provides information on the zoning densities and planning of the proposed project. In addition, the analysis contained in the Draft EIR, Section 5.10, LAND USE AND PLANNING, evaluated the proposed project for consistency with both the Shasta County *Zoning Plan* and Shasta County *General Plan*. 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 pages 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 applicant *General Plan* Objectives and Policies. 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. No change to the Draft EIR is required.

The commenter is referred to ***Master Response-2*** for additional information regarding the project's proposed zoning and density.

Response 64-b: The commenter restates facts disclosed in the Draft EIR stating that the proposed project would result in dust, diesel fumes, noise, and traffic.

The commenter is referred to Section 5.3, AIR QUALITY, Section 5.11, NOISE, and Section 5.16, TRAFFIC AND CIRCULATION, of the Draft EIR for additional information. 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 64-c: The commenter questions how the deepest pockets can come into the area and change zoning laws. The commenter then restates concerns previously stated in ***Comment 64-a***, above.

The proposed project would result in a change of the existing zoning of the proposed project site 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. No change in the actual zoning law would occur. Regarding the balance of the comment, the commenter is referred to ***Response 64-a***, 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 64-d: The commenter questions the calculations used to estimate the proposed project's water demand and expresses concern that these calculations underestimate the water demand for the project.

The commenter is referred to ***Master Response-3*** and preceding ***Response 7-m*** and ***Response 7-n***. The proposed project's water demand is estimated by separately determining indoor and outdoor use factors for each parcel. Indoor estimates are based upon an assumed average daily per-capita use of 55 gallons for each day of the year. With an average occupancy of 2.5 people, each home would be estimated to use 137.5 gallons per day, or nearly 51,000 gallons per year. The use of 55 gallons per-capita per day (gpcd) complies with the California Water Code §10608.20(b)(2)(A) which directs this value to be used for estimating residential indoor uses.

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 64-e: The commenter questions the treatment capacity of wastewater treatment facility based on the comment above regarding water use. The commenter speculates that the wastewater treatment facility would not have enough capacity to serve the proposed project and accessory units.

The commenter is referred to Section 3.0, PROJECT DESCRIPTION, subheading "Wastewater" beginning on page 3-22 of the Draft EIR provides a detailed description of the wastewater system and facility. The commenter is referred to page 5.17-19 which estimates that the proposed project would generate approximately 36,200 gpd of wastewater. Based on analysis contained in Appendix 15.2.6, TIERRA ROBLES WASTEWATER MANAGEMENT PLAN, wastewater generation rates were estimated based on the typical residence being less than 3,200 square feet (sf) with an average of 3.5 bedrooms (including an optional 'mother-in-law' unit). Based on experience, project similar in scope have a peak day wastewater general rate less than or equal to

200 gallons per day per home. Average day wastewater general rates are typically less than 160 gpd. For the proposed project 200 gpd is assumed which results in a total estimated system design flow of 33,200 gpd. This flow is expected during wet winter months, but due to grey water dispersal, may be reduced by up to 40%. Based on the information provided, and analysis in the Draft EIR, the proposed wastewater treatment plant would have adequate capacity to serve the 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 64-f: The commenter refers to an attached media release from the California Water Board, dated July 6, 2016. The commenter states that the water supplier should demonstrate adequate capacity to serve customers through three drought years (multiple-dry years).

The commenter is referred to ***Master Response-3*** and preceding responses under ***Response 7-b, 7-e,*** and ***7-f***. As explained, the project applicant and the County will work with BVWD to provide the details needed to satisfy necessary BVWD infrastructure improvements, water supply, and service requirements prior to BVWD initiating any potable water service. In addition, as described on page 5.17-28 in Section 5.17, UTILITIES AND SERVICE SYSTEMS, to mitigate multiple dry year effects on water supply and other users, the proposed project would be required to provide an alternative water supply during dry-year conditions until such time as the proposed project's demands have existed for three 100-percent water allocation years and are included in BVWD's baseline water demand. Implementation of Mitigation Measures (MM) 5.17-4b requires that the project applicant to identify and implement an Agreement to augment (i.e., supply) BVWD dry-year water supplies until such time as the proposed project's water demands have existed for three 100-percent CVP water allocation years delivered by USBR. Water supplies would be a minimum of 90 percent of the project's prior year water use. 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 64-g: The commenter questions the attractiveness of the homes to buyers considering the square footage, cost of heating, cost of taxes and TRCSD fees, and water restrictions.

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 64-h: The commenter notes that other developments in the area have not sold and questions the desirability of the proposed project. The commenter asks who will be responsible for the facilities developed as part of the proposed project if not enough people purchase homes.

No issue or adequacy of the Draft EIR was raised by the commenter. State *CEQA Guidelines* §15358(b) state that effects analyzed under CEQA must be related to a physical change to the environment. 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 64-i: The commenter states that the Draft EIR states there will be significant impacts to noise and air from short-term construction impacts. The commenter states, the construction could take place over a number of years.

The Draft EIR anticipates project buildout over a 10 to 15 year period. Regarding noise impacts, the commenter is referred to preceding responses under ***Response 41-a*** as well as the discussion of impacts in Section 5.11, NOISE, of the Draft EIR, which were *less than significant*, or *less than significant with mitigation*.

Regarding air quality, the commenter is referred to preceding responses under ***Response 17-l*** and ***17-m*** as well as Section 5.3, AIR QUALITY, of the Draft EIR, which discuses that all but cumulative impacts would be *less than significant* or *less than significant with mitigation*, with the exception of cumulative impacts. Cumulative impacts were disclosed to be *significant and unavoidable* on page 5.3-22 of the Draft EIR.

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 64-j: The commenter requests that Shasta County maintain the existing zoning and allow the developer to build within those parameters. The commenter states that this would reduce water usage, traffic, noise, and eliminate the need for the treatment facility, and maintain the rural community.

The commenter is referred to ***Response 64-a*** through ***64-j***, above, which address the previously stated concerns. The commenter also is referred to Section 7.0, ALTERNATIVES TO THE PROPOSED PROJECT, which discuss alternatives including the "No Project/Development Alternative in Accordance with Existing Zoning." The commenter also is referred to ***Master Response-2*** and preceding ***Response 44-a***, which also discuss the alternatives in the Draft EIR. No change to the Draft EIR is necessary.

Response 64-k: This comment is reference to the previously referenced State Water Resources Control Board article.

The article 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.