

Letter 69 – James & Teresa Griffith (December 28, 2017)

Kimberly Hunter

From: flynpig1 <flynpig1@gmail.com>
Sent: Thursday, December 28, 2017 11:03 AM
To: Kimberly Hunter
Subject: Tierra Robles 2nd Public Comment
Attachments: Tierra Robles 2nd.pdf

Ms. Kim Hunter
Shasta County Resource Management, Planning Dept
1855 Placer St Suite 103
Redding, CA 96001

Shasta County Board of Supervisors
David Kehoe (Dist 1)
Leonard Moty (Dist 2)
Mary Rickert (Dist 3)
Steve Morgan (Dist 4)
Les Baugh (Dist 5)

1450 Court St
Redding, CA 96001

Response to the Tierra Robles Draft EIR

After submitting my original letter I have had time to review the Bella Vista Water District (BVWD) Urban Water Management Plan Update (UMWP) of 2015, dated December 2016. This document contains data used as a basis for some of the findings in regards to water availability to the proposed project. During this review I found information that raises many questions about the accuracy of BVWD calculations and the Tierra Robles Project.

69-a

BVWD Groundwater Sources

BVWD has stated many times in the UMWP that they can produce 4200 AFY from their ground well pump stations, this figure rises 810 AFY in 2020 (to 5010 AFY) and every 10 years thereafter. These figures were also used in the Draft EIR to calculate BVWD's available excess water.

However, this 4200 is refuted in the BVWD's own documents, specifically the UMWP.

Copied from page 57,

"The five wells in service can produce 2,800 to 4,000 acre feet (AF) of water annually combined." "However, the wells can only be utilized about 50 to 75 percent of the time due to operational constraints. Pumping and treating the well water is 1.5 to 2 times more expensive than CVP water."

69-b

Copied from UMWP page 66,

"10 Summary of Existing and Planned Sources of Water

The District has five (5) groundwater wells that averaged 704 AF of annual water yield from 1995-2015 with a maximum production of 1,600 AF in 2005 (and 1,535 AF in 2015)."

- According to the UMWP this rate of pumping has not caused a significant drop to the aquifer water level, it also has not allowed it to rise either.

Also from page 66,

"It is estimated that at 75% utilization (allowing for well maintenance, equipment failures, reduced output if the wells are run for an extended amount of time, and low demands during the fall and winter months) the wells could produce an average of 3,400 AF of water annually."

- What is the 100% utilization yield? 3150 is 75% of 4200 and 3400 is 75% of 4533.
- What conditions would cause only being able to pump 2800?
- How will pumping 6 times our historical average impact the aquifer water levels?

Copied from page 56,

"The 2014 Sustainable Groundwater Management Act (SGMA) will require that groundwater supplies be managed for long-term sustainability, with no net long-term overdraft. In other words, the Act will limit how much groundwater can be pumped. At the time of this UWMP, many provisions in SGMA have not yet gone into effect, and, throughout the state, water agencies are in the preliminary planning stages for SGMA compliance. As a result, DWR does not require that SGMA be addressed in the 2015 UWMPs."

- Based on this statement there is no way to know what will happen to the aquifer water levels if BVWD began to pump 6 times their historical average, or 2.6 times the maximum single year.
- BVWD already has 1 well that is no longer used due to lack of production. Is this due to overdraft of the aquifer?
- The negative impacts of the SGMA are still unknown and not considered, yet they may impact how much water will be available to be pumped by BVWD. Will they be able to draw 4200? 3400? 2800? or maybe only our historical average of 704?

69-c

Based on the above statements BVWD can pump a maximum of 2800-3400-4000 or 4200 AFY from their wells. Yet every assumption in the draft EIR uses 4200 AFY. Historically BVWD has only averaged 704 AFY since 1995. BVWD has historically only pumped 15% of what is being used for the EIR. When the effects of the SGMA are fully implemented it seems safe to assume that our historical average of 704 AFY may be near the amount they will be able to pump without any overdraft.

Copied from page 68,
 7 Water Supply Reliability

7.1.1 "This reallocation of water supply over the last couple of decades with no added storage to offset these impacts means the District is likely to experience shortages more frequently and more severely in the future (BVWD, 2015)."

- Without adding any additional demand, BVWD states they are likely to experience shortages more frequently and more severely!

69-d

Table 7-2: Bases of Water Year Data

Water Year Type	Base Year(s)	Available Supplies if Year Type Repeats					Percent of Total Average
		CVP	ACID ³	Ground-water	Other ¹	Total ²	
Average Water Year ³	2004	12,665	1,536	4,200	3,127	21,528	100%
Single-Dry Water Year	2015	2,578	1,152	4,200	1,264	9,578	44%
Multiple-Dry Water Years – 1 st Year	2009	6,794	1,536	4,200	2,608	15,138	70%
Multiple-Dry Water Years – 2 nd Year	2010	9,731	1,536	4,200	0	15,467	72%
Multiple-Dry Water Years – 3 rd Year	2011	9,289	1,536	4,200	2	15,027	70%

1-Other supply includes transfers, which are subject to availability. Future availability is unknown.
 2-All water deliveries are calculated in acre-feet per year (AFY). It should be noted that they are not adjusted for population growth.
 3-ACID transfers can be reduced to 1,152 AF/year in a critically dry year.

Using the data from Table 7-2 I find some errors. I point this out not only to show that at every opportunity the data seems to favor the position of BVWD and the DEIR but, the data is being used as a baseline for water demand forecast data in the Tulley & Young Memorandum as part of the DIER. Some of the errors are so basic that I believe it calls into question the more technical aspects of the report which I cannot address as a layperson.

The table below, 3-2 is from the Tulley & Young Memorandum.

Table 3-2: Supply Projections²⁷

Source	Water Supply (acre-feet/year)				
	2020	2025	2030	2035	2040
CVP Contract	24,578	24,578	24,578	24,578	24,578
ACID Long-Term Transfer	1,536	1,536	1,536	1,536	1,536
Groundwater	5,010	5,010	5,820	5,820	6,630
Total	31,124	31,124	31,934	31,934	32,744

As you can see the supply is significantly larger in the Tulley & Young table (31124 AFY) than in BVWD's own table (21528 AFY). I have already discussed how I believe BVWD is relying on very optimistic supply numbers and the Tulley & Young numbers are very unlikely.

The 31124 AFY includes CVP deliveries of up to 24578 AFY however, historically BVWD has never surpassed 19000 AFY from USBR, so it seems unrealistic to use 24578 AFY. As you can see in Appendix "D" of the UWMP 2015 (below) the highest water deliveries from CVP was 18064 AFY in 2002. Deliveries have been on a general decline ever since.

The table below, 7-2 is from the UWMP 2015.

Table 7-2: Bases of Water Year Data

Water Year Type	Base Year(s)	Available Supplies if Year Type Repeats					Percent of Total Average
		CVP	ACID ³	Ground-water	Other ¹	Total ²	
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Single-Dry Water Year	2015	2,578	1,152	4,200	1,264	9,578	44%
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Multiple-Dry Water Years – 3 rd Year	2011	9,289	1,536	4,200	2	15,027	70%

1. Other supply includes transfers, which are subject to availability. Future availability is unknown.
 2. All water deliveries are calculated in acre-feet per year (AFY). It should be noted that they are not adjusted for population growth.
 3. ACID transfers can be reduced to 1,152 AF/year in a critically dry year.

69-d
 Cont.

Page 5 of 5

- Have any studies been done to confirm that 4200 (6 times our historical average) can be pumped without overdraft?
- Due to the increased cost of well pumping, what is the projected increase to rates should BVWD actually be required to pump this amount?
- Are there any contingencies in the event the SGMA prevents an increase in pumping?
- BVWD states that without additional storage shortages will occur more frequently and more severely. When will additional storage become available?
- How many "will serve letters" has BVWD issued, but have not yet been added to the demand?
- How much anticipated demand is there from lots which BVWD is not required to issue will serve letters but still obligated to provide water?

Mitigation

I think it would require speculation to determine any mitigation measures until there is more data. The SGMA may have a significant negative impact on BVWD's ability to pump water as beginning as early as 2020. Without the data how can BVWD or Shasta County make reasonable plans to use water availability numbers that have not taken this into consideration?

Thank You for your consideration of these issues,

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

69-d
Cont.

Response to Letter 69 –James & Teresa Griffith

Response 69-a: The commenter notes that based on the review of the Bella Vista Water District (BVWD) Urban Water Management Plan (UWMP) dated December 2016, additional questions have been raised.

The Lead Agency has prepared **Responses 69-b** through **69-d**, below, to specifically address the commenter’s concerns. The comments are noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration.

Response 69-b: The commenter provides excerpts from the BVWD UWMP and asks questions regarding the BVWD’s ability to produce 4,200 acre-feet per year (AFY) of water from their ground well pump stations and how the water uses will impact the aquifer water levels.

This comment is specific to the BVWD UWMP, rather than specific to the Draft EIR analysis of physical environmental impacts, mitigation measures, and level of significance associated with the proposed project. The commenter is referred to **Master Response-3** regarding water supply and reliability. 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 required.

Response 69-c: The commenter quotes from page 56 of the BVWD UWMP and questions the assumption in the Draft EIR of using 4,200 AFY when BVWD has only averaged 704 AFY of groundwater pumping since 1995.

Please refer 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 and no change to the Draft EIR is required.

Response 69-d: The commenter quotes the information in the BVWD UWMP, questions the data used in Appendix 15.10, WATER DEMAND EVALUATION, of the Draft EIR, and questions the availability and reliability of the BVWD’s water supply.

Please refer 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 and no change to the Draft EIR is required.

Letter 70 – Ed Walters (December 28, 2017)

Kimberly Hunter

From: Resource Management
Sent: Thursday, December 28, 2017 8:08 AM
To: Kimberly Hunter
Subject: FW: Tierra Robles sub division-- Very Opposed

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

From: Ed Walters [mailto:pce1@citlink.net]
Sent: Thursday, December 28, 2017 12:29 AM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: Tierra Robles sub division-- Very Opposed

My name is Ed Walters,
10370 Daystar Way,
Palo Cedro, Ca

I live approximately 1/2 mile off Boyle road to the east from this proposed sub division.
No improvements have been made to Boyle road in the 41 years i have lived here.
Since the building of Foothill school the traffic has increased substantially and the Speeds have increased.
We residents of Daystar Way- Coloma Dr have ask Foothill high school, Shasta County Sheriffs office and Highway Patrol to police our Private road.
No help has been offered for the people who FLY thru to beat Busses or trucks slowing traffic on Boyle Rd.

Oops-- i wrong your only improvement was to add metal turn arrows at the intersection of Daystar and Boyle--- There have been many accidents at and near this intersection Including a couple at deaths from this corner.
The mail boxes get hit often--about once per year.

Trees have been cut down in an attempt to save people when they go off the road. Now they just knock down the neighbors fences

The point is adding considerable traffic to Boyle road is not wise decision without making major improvements prior to construction.
Your summary says at peak 166 units with a couple cars per lot-- may will have kids going to nearby schools adding to the traffic problems in am Hours

Now we need to address Boyle and Deschutes intersection.

Your proposal is to add stop signs to the intersection when you deem it necessary. and At whose expense????

The intersection problem needs to be SOLVED BEFORE the traffic increases at the DEVELOPERS EXPENSE

I hear the Sirens quite often for accidents at this already busy intersection--
Reducing the speed of vehicles on Deschutes and improving the Visibility of the intersection need some very serious consideration.

In the 7-9 am time frame nearly impossible to cross Deschutes

Then lets consider the traffic around Foothill high school-- The Planning peoples solution was to Upgrade Deschutes by Building a sidewalk and throw up four school Zone signs after spending many millions on the school

The Development should not be allowed to move forward until these issues are resolved and constructed.

I VOTE NO!!!!!!!!!!!!!!

70-a
Cont.

Response to Letter 70 – Ed Walters

Response 70-a: The commenter expresses opposition to the project and expresses concern regarding the addition of traffic to area roadways given the existing traffic and safety conditions.

Section 5.16, TRAFFIC AND CIRCULATION, and Appendix 15.9, TRAFFIC IMPACT STUDY, of the Draft EIR provides discussions regarding existing traffic, traffic conditions with the addition of project-generated traffic, and roadway safety performance.

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, 57-l, 65-l, 65-n, and 65-o.** 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 71 – Kathy and Steve Callan (December 29, 2017)

To: Kim Hunter, Shasta County Department of Resource Management, Planning Department

Re: Tierra Robles Proposed Development

Date: December 28, 2017

Comments:

Dear Ms. Hunter:

As longtime residents of Palo Cedro, we are very concerned about the Tierra Robles development proposed for the eastern portion of the county. Our concerns are related to specific issues addressed in the draft EIR.

These are our concerns:

1. Destruction of/fragmentation of sensitive biological resources, as stated in the draft EIR:

IMPACT 5.4-5 Cumulative development within the project area may affect sensitive biological resources, including special-status species, wetland habitat, and oak woodlands.

Development of the proposed project would result in the conversion of approximately 46.2 acres of annual grassland to urban uses; fragmentation of approximately 42 acres of annual grassland; conversion of approximately 146.24 acre of oak woodland to urban uses; and fragmentation of approximately 300.4 acres of oak woodland, thereby contributing to the cumulative regional loss of grasslands and oak woodlands that may support special-status plant and animal species, nesting bird habitat, migration corridors, and general wildlife habitat.

Whereas MM 5.4-1a requires a permanent conservation easement to be established to partially offset the loss of oak woodlands, and MM 5.4-1b and MM 5.4-1c require permanent conservation easements and deed restrictions for the open space areas and RMAs for the protection of oak woodlands and habitat values, the conversion and fragmentation of annual grasslands and oak woodlands are irreversible losses of wildlife habitat and remain cumulatively considerable, and therefore, significant and unavoidable impacts.

2. Greatly increased volume of traffic on already overburdened roads, such as Deschutes Road in Palo Cedro, as stated in the draft EIR. Deschutes Road is already overburdened during peak flow times because of Foothill High School and it bears a great deal of big-rig truck traffic. We cannot imagine any traffic improvements that would significantly ease the added traffic caused by the addition of 166 homes to the area. Additionally, the cost for any traffic improvements, as things now stand, would have to be borne by the taxpayers of Shasta County, as the proposed improvements at the intersection of Old Alturas and Old Oregon Trail and the intersection of Boyle Road and Deschutes Road "are not part of any current Shasta County improvement plan or fee program," according to the draft EIR:

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71-a

71-b

IMPACT 5.16-5 Implementation of the proposed project could result in increased traffic volumes at study area intersections under Year 2035 cumulative plus project conditions.

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.

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 MM 5.16-3 and 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.

According to a December 11, 2018 article in the *Record Searchlight* (<http://www.redding.com/story/news/2017/12/11/neighbors-worried-subdivision-east-redding/940908001/>), a traffic analysis of the proposed project will generate 1,656 additional vehicle trips per day (upon build-out) on the roads surrounding the project. The intersection at the Hwy. 44 westbound onramp and Airport Road and the intersection of Boyle and Deschutes Roads will be significantly impacted, according to a traffic analysis cited in the article. A signal, or roundabout, is proposed for the Hwy. 44/Airport Road intersection, while a four-way stop is proposed for the intersection at Boyle and Deschutes Road.

Based on our experience, we feel that the four-way stop proposed at the intersection of Boyle and Deschutes Road would not alleviate the increased traffic expected from the proposed development. During peak traffic hours, traffic is already backed up on Deschutes, from Foothill High School, all the way to Hwy. 44 E. As it now stands, it's difficult to get out onto Deschutes Road from our residential area, due to traffic, even during non-peak traffic flows.

The addition of 1,656 additional vehicle trips is unsustainable, even with the proposed traffic mitigations.

3. Water availability is a critical issue. We strongly disagree with the EIR that the project's impact on hydrology is a "less than significant" impact. Consider the following:

a. The proposed project would get its water from the Bella Vista Water District.

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71-b
Cont.

71-c

- b. The recently approved Bethel Church campus in north Redding will also draw its water from the Bella Vista Water District.
- c. Because of the drought, in 2015, the Bella Vista Water District's allocation of water was cut by 75% (agricultural water allocation was cut by 100%), so the district rationed water to users under a declared water shortage emergency.
- d. Water is a finite resource.

71-c
Cont.

The County expects the developer of Tierra Robles to find other sources of water as the project is built out. This is wishful thinking, and, unfortunately, wishful thinking does not supply people with drinking water, water for farming and gardening, or water for household uses. Given California's frequent droughts in the face of climate change, this is an unrealistic expectation. The project as it is currently proposed is not sustainable, due to lack of water resources alone. This is not only a quality-of-life issue, it's an issue of sustainability for our current community. How is the developer going to find more available water when current residents of Shasta County are already suffering significant cutbacks in their water supply during periods of drought?

4. Growth inducement, which affects the quality of life here in Shasta County, is also of great concern to us. We disagree with the following assessment in the draft EIR:

Growth Inducement

The location of future growth throughout unincorporated Shasta County would continue to be controlled guided by its General Plan. Therefore, the proposed project would not have a significant growth-inducing effect. Refer to Section 6.0, GROWTH-INDUCING IMPACTS, for detailed analysis and discussion.

71-d

The developer of this project has applied for variances to the current zoning on several parcels. If these variances are granted for this developer, as has happened for other developers, it will further dilute the effectiveness of the General Plan and set yet another precedent for developers in the future who want to apply for zoning variances for their projects. Accordingly, we see this project as a significant inducement to growth in this rural area.

If a person/entity purchases property with a specific zoning, they should be expected to abide by that zoning.

5. Increases in greenhouse gas emissions will be "unavoidable and significant," according to the draft EIR:

71-e

Unavoidable Significant Adverse Impacts

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IMPACT 5.7-1 Greenhouse gas emissions, either directly or indirectly, generated by the proposed project may have a significant impact on the environment.

Therefore, the proposed project would potentially conflict with the County's RCAP and AB 32 despite the implementation of the Project Design Features and MM 5.7-1. Impacts would be significant and unavoidable.

IMPACT 5.7-1 Greenhouse gas emissions, either directly or indirectly, generated by the proposed project may have a significant impact on the environment.

Despite the implementation of the Project Design Features and MM 5.7-1, project related GHG emissions would not meet the reduction targets established by AB 32 or SB 32, and impacts would remain significant and unavoidable.

IMPACT 5.7-2 Implementation of the proposed project could potentially conflict with an applicable greenhouse gas reduction plan, policy, or regulation.

Therefore, the proposed project would potentially conflict with the County's RCAP and AB 32 despite the implementation of the Project Design Features and MM 5.7-1. Impacts would be significant and unavoidable.

71-e
Cont.

Summary – The proposed project is not in keeping with the current zoning and rural nature of the area. As stated in the EIR, the project will have significant and unavoidable impacts on the oak woodlands and annual grasslands in the area, affecting both the wildlife and the quality of life for current/future human residents. Water availability is a huge issue, especially with recent drought conditions/rationing and December 2017 being the second driest year in Shasta County recorded history. The additional traffic generated by the proposed project is unsustainable, even with the proposed mitigation measures, and will result in additional noise and pollution. Zoning variances granted for this project would fuel future growth in an area that is known for its rural nature and open space values.

Because of all these significant and unavoidable impacts, we urge that the project, as it is currently proposed, not be approved.

Respectfully,

Kathleen M. Callan

Steve T. Callan

Kathy and Steve Callan

Palo Cedro, California

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71-f

Response to Letter 71 – Kathy and Steve Callan

Response 71-a: The commenter restates Impact 5.4-5 and the impact discussion under the annual grassland and oak woodlands heading on page 5.4-56 of Section 5.4, BIOLOGICAL RESOURCES.

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 71-b: The commenter expresses concern regarding the increased volume of traffic on already overburdened roads and the cost of roadway and intersection improvements because they are not in the plan or fee program. The commenter states that the four-way stop proposed at Boyle Road and Deschutes Road would not alleviate the traffic congestion because it would result in additional traffic queue lengths and exacerbate the existing conditions.

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, 57-l, 65-l, 65-n, and 65-o**. These responses to comments provide discussion regarding traffic impacts, safety, mitigation, and fair share funding. 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 required.

Response 71-c: The commenter disagrees with *less than significant* conclusion of the Draft EIR regarding water supply and availability. The commenter makes additional statements regarding water supply, droughts, and sustainability. The commenter then questions how the developer will find additional supply for the increased demand.

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 and no change to the Draft EIR is necessary.

Response 71-d: The commenter states that growth inducement is of concern and disagrees with the assessment in the Draft EIR and correctly quotes a discussion of growth inducement from the Draft EIR. The commenter continues stating if the variances are accepted it will dilute the effectiveness of the *General Plan* and set precedence for other zoning variances, and purchasers should have to abide by the existing zoning.

The commenter is referred to **Master Response-2** regarding the listed concerns. 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 71-e: The commenter restates that impacts to greenhouse gas emission would be significant and unavoidable. The commenter also restates Impact 5.7-1, Impact 5.7-2, and portions of the conclusions of the Draft EIR.

Although, no issue or adequacy of the Draft EIR was raised by the commenter the commenter is referred to preceding **Response 11-a** through **11-j** for discussions of greenhouse gas emissions. 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 71-f: The commenter restates concerns regarding the above listed comments. The commenter restates concern about zoning, impacts to oak woodland, grassland, and wildlife, water availability, and increased traffic, and requests the project not be approved.

The commenter is referred to **Responses 71-a** through **71-e**, above. Regarding impacts to wildlife, the commenter is referred to preceding **Responses 3-a** through **3-v**. 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 72 – Ann Mobley (December 28, 2017)

Kimberly Hunter

From: Resource Management
Sent: Thursday, December 28, 2017 8:07 AM
To: Kimberly Hunter
Subject: FW: Tierra Robles DEIR Public Comments

From: dmobley@frontiernet.net [mailto:dmobley@frontiernet.net]
Sent: Wednesday, December 27, 2017 7:39 PM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: Tierra Robles DEIR Public Comments

Please DO NOT approve the Tierra Robles proposed development. It is critical that no precedent be set for the rezoning of rurally zoned parcels since such approvals will result in unsustainable water demands within the Bella Vista Water District, among many other serious problems. The resulting suburban sprawl does not meet the County's General Plan and Zoning Ordinances.

72-a

Water and wastewater are of huge concern. The documents (the DEIR) submitted to you are in error in many ways, including estimates of per household daily use of water, even during drought years. If these erroneous figures are the basis of any concrete plans, then obviously any resulting infrastructure would be seriously flawed.

72-b

Water problems are already significant in the area of the proposed subdivision, and the addition of such a large number of homes, without a significant increase in delivery methods, not to mention drought mitigation in our drought prone state, will only create worse problems for both current and proposed residents.

Traffic circulation on flawed roads is another area of significant concern. The roads in this area are already over-taxed with current traffic, and adding such a large number of homes will have a serious impact for all current (and future) residents.

72-c

I urge you to seriously consider the ramifications of this proposed development, and that if it is approved in any way, it will only be with further study, and with the implementation of significant mitigations as proposed by Brad Seiser and others. Remember the County's General Plan and Zoning Ordinances!

Ann Mobley
10339 Oriole Lane
Palo Cedro, CA 96973
530-547-3823

72-d

Response to Letter 72 – Ann Mobley

Response 72-a: The commenter states concern about the proposed project setting precedent for rezoning and place additional demand on the Bella Vista Water District (BVWD). The commenter states the resulting urban sprawl does not meet the *General Plan* and *Zoning Ordinances*.

The commenter is referred to **Master Response-2** regarding project consistency with the *General Plan* and *Zoning Ordinance*. The commenter is referred to **Master Response-3** regarding the BVWD and water supply. The comments are 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 72-b: The commenter states that water and wastewater are of concern and the Draft EIR erred in water use rates and results in infrastructure being flawed. The commenter also states that water issues are already significant and approval of the project will worsen problems.

The commenter is referred to **Master Response-3** and preceding **Responses 7-a** through **7-p** regarding water supply and water rates, and **Master Response-5** regarding wastewater. 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 72-c: The commenter states that the roads in the area are already over-taxed and adding the homes from the proposed project will have a serious impact 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 72-d: The commenter requests the ramifications of the proposed project be considered and that if the project is approved that it should only be done with the mitigation measures proposed by Brad Seiser and others.

No issue or adequacy of the Draft EIR was raised by the commenter. The commenter is referred to pages 2-2 through 2-52 of Section 2.0, EXECUTIVE SUMMARY. The Executive Summary provides a description of the proposed project, and outlines the basic purpose of the Draft EIR, which is to identify impacts or ramifications that would result from implementation of the proposed project. Specific to environmental impacts, the commenter is referred to pages 2-8 through 2-24, which further details potential impacts by each resource area and provides details on the alternatives that were evaluated. The commenter also is referred to Table 2-2, COMPARISON OF ALTERNATIVE ENVIRONMENTAL IMPACTS WITH THE PROPOSED PROJECT, on page 2-25, and Table 2-3, PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES, on page 2-3, which describe each impact and list mitigation, when needed, to reduce the

impacts. Regarding the commenter's request to include the mitigation measures proposed by Brad Seiser in **Comment Letter 65**, the commenter is referred to preceding **Responses 65-a** through **65-y**, above, which are direct responses to each of Mr. Seiser's respective comments and/or requests for 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 required.

Letter 73 – Glenn and Sara Hoxie (December 29, 2017)

From: SARA CRANDELL-HOXIE roadrunnerfarm@sbcglobal.net
Subject: Tierra Robles Public Comments
Date: December 29, 2017 at 12:07 PM
To: resourcemanagement@co.shasta.ca.us

RECEIVED

DEC 29 2017

County of Shasta
Public Counter



December 28, 2017
Kent Hector, Senior Planner,
Shasta County Department of Resource Management, Planning Division,
1855 Placer St., Suite 103,
Redding, CA 96001

Dear Mr. Hector,

We have reviewed the the Draft Environmental Impact Report for proposed Tierra Robles subdivision and have concluded that it is not adequate in addressing the water deficits in this region of Shasta County. It also does not comply with the counties General Plan. Infrastructure such as wastewater treatment are not adequately addressed, nor is traffic and its impact on area roads and schools.

73-a

Droughts are the new normal. We are currently experiencing a drought. Existing residents were allocated water in the last drought. There is simply not enough water in this part of rural eastern Shasta County to sustain a subdivision. The DEIR does not adequately address this deficit. It does not address the needed water over time and the sources of this water. There is insufficient data on future water demands of the area and how theses demands will be met. Water usage statistics used in the DEIR are not consistent with actual water district data. Language in the DEIR leaves the Bella Vista Water District and existing customers paying for new sources of water if a drought occurs several years into the building of the development. That is if ancillary water can even be delivered in the future. This is unacceptable. The water district and the current residents must be protected from this liability.

73-b

If the planned development comes to fruition and other developments are installed in the area due to the precedent set by Tierra Robles, what water source will be used? Furthermore it the DEIR states that a development would have a "significant impact" on groundwater. This is a rural area, groundwater is is a precious resource for existing residents. This cannot be compromised.

Tierra Robles is not in compliance with the general plan for the county. It violates zoning requirements. Existing zoned parcel sizes require this area to be rural/agricultural. The DEIR is contradictory when stating whether this area would be considered rural or semi rural. In any case the change in parcel size with this planned development will be in direct violation of the general plan for Shasta County. A zoning amendment would cause

73-c

parcel sizes to be inconsistent with the surrounding area. The existing zoning regulations are sustainable, an exception would not be sustainable and would likely result in setting a precedent causing more development in this area thus further violating the general plan and further compromising sustainability for all who currently reside in the area.

73-c
Cont.

The projected water usage is based on faulty data and therefore the need for adequate water treatment is also understated. The plan to treat wastewater must be rewritten using the actual data on water usage and be mitigated accordingly.

73-d

Boyle Road is a thoroughfare connecting several schools including Columbia School, Foothill High School and North Cow Creek School. There are other schools linked by area roads including Redding Christian School, Chrysalis Charter School, Junction School and Bela Vista School. The DEIR does not address speeds on these roads. Anecdotal I observe most private vehicles traveling on Boyle Road to be traveling in excess of 50 MPH. All schools have students who live in the area. Several have busses that use Boyle Road, Old Alturas Road and Deschutes Road. The safety of students with increased traffic flow is a great concern. Speed was not a factor in the DEIR yet speed related accidents occur on these roads frequently.

73-e

This type of leapfrog development is not sustainable in terms of water use and infrastructure. The county plan as it stands is sustainable for this area. Tierra Robles Subdivision is ill conceived and poorly planned. The DEIR omits important data and leaves existing land owners with an unknown future costs not carried by the developer. For these reasons we are opposed to this development.

73-f

Sincerely,


Glenn and Sara Hoxie
10024 Roadrunner Way Redding, Ca 96003

(530) 221-7057

Response to Letter 73 – Glenn and Sara Hoxie

Response 73-a: The commenter states that the Draft EIR is not adequate in addressing water supply, wastewater treatment, schools, and traffic, and it does not comply with the *General Plan* 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 commenter is referred to **Master Response-3** regarding water supply, **Master Response-5** regarding wastewater, and preceding responses under **Response 32-g** and **48-k** regarding schools. The commenter is also referred to Section 5.16, TRAFFIC AND CIRCULATION, for a discussion of traffic impacts, and **Master Response-2** for a discussion of the County's existing *General Plan* and *Zoning Plan*. 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 73-b: The commenter states that the Draft EIR does not adequately address water resources including water use over time, water sources, impacts to other residents, and impacts from drought. The commenter asks what water will be used if the proposed project sets a precedent for other developments, and makes an unclear statement that, "Furthermore it the DEIR states that a development would have a 'significant impact' on groundwater." The commenter concludes that groundwater is a precious resource and can't be compromised for existing residents.

The commenter is referred to **Master Response-3**, which discusses estimated water use that can be expected for each residence, the existing uses, alternative sources for water, and the effects of multiple dry years, and use of groundwater. The commenter also is referred to preceding **Responses 7-a** through **7-b**, which will provide additional information.

Regarding the proposed project being a precedent setting action, the commenter is referred to page 6-6 of Section 6.0, GROWTH INDUCING IMPACTS, which analyzed and found that the proposed project does not provide any precedent setting actions that, if approved, would specifically allow or encourage other projects and resultant growth to occur.

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 73-c: The commenter states that the proposed project is not in compliance with the *General Plan*, violates zoning requirements, and is inconsistent in discussion of rural and semi-rural environments. The commenter further states that the existing zoning regulations are sustainable but the exception is not and would likely result in a precedent setting action and result in additional impacts.

The commenter does not provide substantial evidence to support statements made. Pursuant to State *CEQA Guidelines* §15064 an effect shall not be considered significant in the absence of substantial evidence. For additional clarification, however, the commenter is referred to **Master Response-2** regarding conformance with the *General Plan* and *Zoning Ordinance*, and discussion of rural and semi-rural. In addition, the commenter is referred to Draft EIR page 6-6 in Section 6.0, GROWTH INDUCEMENT, which discusses the potential for the proposed project to result in a precedent setting action. 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 73-d: The commenter states that the water use rates are based on faulty data and therefore, wastewater treatment impacts are not correct, must be rewritten and mitigated.

The commenter does not provide substantial evidence to support statements made. Pursuant to State *CEQA Guidelines* §15064 an effect shall not be considered significant in the absence of substantial evidence. For additional clarification, however, the commenter is referred to **Master Response-3** and preceding **Responses 7-c, 7-m, and 7-n**, which provide detail on the methodology used to determine the 55 gppd water use and explain why it is appropriate. 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 73-e: The commenter states that Boyle Road is a thoroughfare connecting several schools and that the Draft EIR does not address speeds on these roads. The commenter expresses concern for the safety of the students with the addition of project-generated traffic.

The commenter is referred to preceding **Response 13-e** and **14-b** related to traffic volumes and vehicle trips along Boyle Road, and **14-b** regarding safety. Regarding traffic speed and roadway safety, **Responses 17-o** and **65-l** provide further discussion related to speed of traffic. **Responses 43-b** and **48-k**, above, are specific to traffic impacts and school zones. The commenter is referred to preceding **Responses 5-f, 17-p, and 57-i** regarding fair share funding. 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 73-f: The commenter states that the proposed project is a type of leapfrog development and is not sustainable. The commenter then restates that the Draft EIR omitted important data without providing specific examples and the proposed project leaves existing land owners with unknown future costs.

The commenter is referred to page 6-5 in Section 6.0, GROWTH-INDUCING IMPACTS, which discusses, “leap frog” development. The Draft EIR concludes that the proposed project is consistent with surrounding land use patterns and fills in a gap between developed areas, which is the opposite of “leap frog” development. In addition, the Draft EIR concludes the proposed project would result in a contiguous development pattern within the area, would be accessed by the existing transportation network,

and includes utility infrastructure to serve increased demand. For these reasons, the proposed project is not considered a “leap frog” or “premature” type of development. 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 74 – Andrew Creasey (December 28, 2017)

Kimberly Hunter

From: Resource Management
Sent: Thursday, December 28, 2017 9:39 AM
To: Kimberly Hunter
Subject: FW: Tierra Robles DEIR Public Comments
Attachments: Tierra_Robles_DEIR_Cheat_Sheet.doc

From: Andy Creasey [mailto:andcre32@gmail.com]
Sent: Thursday, December 28, 2017 9:36 AM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: Tierra Robles DEIR Public Comments

Dear Ms Hunter,

I am opposed to the Tierra Robles rezoning application. In the interest of brevity, please see the attached.

Sincerely,

Andrew Creasey
10490 Maddelein Lane
Palo Cedro, CA 96073

74-a

Tierra Robles DEIR Cheat Sheet

Overall Comment: Most important to the analysis of this DEIR is how the approval of the Tierra Robles planned development sets the precedent for the rezoning of rurally zoned parcels for future planned developments, that result in suburban sprawl and unsustainable water demands within the Bella Vista Water District (BVWD) service boundaries. Also, the DEIR proposal for a zoning amendment revision to a Planned Development classification does not meet the County's General Plan and Zoning Ordinances as outlined below.

74-a

Currently, BVWD has outstanding will serve commitments to supply water to 707 parcels within the district. Does BVWD know how much water demand is needed from these active will serve parcels? Where's that water going to come from, particularly in the 'new normal' of single and multiple drought years that result in severe water allocation cutbacks from the Central Valley Project (CVP).

Is the answer to all these CVP water allocation cutbacks more restrictions to existing customers, or do we stop or scale back suburban sprawl developments in rural areas that have finite water supply resources?

74-b

Before the Planning Commission or Board of Supervisors can approve this or any large suburban development, they must re-examine the assumptions and estimates that BVWD used for determining the amount of water it can expect long term to be allocated to the district by the Central Valley Project in relation to the growth expected in demand from within the District from planned development zones and the East Redding infill areas. Until this analysis is completed the county cannot responsibly determine how much planned development water demand can be sustained into the future.

Regarding the Proposed Zone Amendment Z10-002, Tract Map 1996, SCH No. 2012102051

Comment 1. Page 2-6 of the Executive Summary under "Rural Residential Parcels" states "the proposed project would include 166 single family residential parcels ranging from 1.38 acres to 6.81 acres in size on approximately 471.92 Acres...for development in six phases". The DEIR proves that proposed distribution of lot sizes does not meet General Plan and Zoning requirements that development be consistent with existing parcel sizes and zoning and fitting in with the rural/agricultural character of the surrounding area. The analysis below proves Tierra Robles is an example of a suburban planned development dumped in the middle of a rural residential area!

74-c

In Sec. 5.10.12, the DEIR states, "Although the proposed project would alter current conditions on the site, the proposed project would be compatible in density with the surrounding existing

uses.” It goes on to say that the rezone would not change the rural character of the area but later contradicts and states it will change to “semi-rural.”

74-c
 Cont.

A zoning amendment for a Planned Development should not be granted because the number of parcels, acreage sizes and percentages of parcels in each acreage size do not meet the standard to fit with the area’s existing zoning and parcel sizes which would be against the County General Plan and Zoning Regulations.

The DEIR uses the Composite Parcel Size Map, Section 5.10-1 to show the land area parcel sizes that are 1 to 1.5 miles surrounding the proposed development. By counting the number of mapped parcels in each acreage category, a percentage in each category can be determined and then compared to the Development’s percentage of homes to be built in each acreage category, which shows there is no correlation of this Development to the surrounding rural community.

The chart below combines and compares Table 3-4 “Project Acreage and Lotting Summary” on page 3-16 of the Subdivision Development Summary to the number and percentage of parcel acreages from the Composite Parcel Map Figure 5.10-1:

74-d

<u>Acreage</u>	<u>Lotting Description</u>	<u>% Parcels</u>	<u># of Surrounding Parcels**</u>	<u>% of Surrounding</u>
0 - .99 ac	0	0	46	5%
1.00 – 1.99 ac	45 Homes	27%	48	5%
2.00 – 2.99ac	65 Homes	39%	155	17%
3.00 – 3.99 ac	25 Homes	15%	137	15%
4.00 – 4.99 ac	16 Homes	10%	117	13%
5.00 – 5.99 ac	10 Homes	6%	128	14%
6.0+ ac	5 Homes	3%	293	32%
Totals	166 Homes		924 Parcels	

** Non-Exempt Parcels less than 6 acres - 273 - not included in the above surrounding percent calculations since the exact acreage is unknown, other than less than 6 acres.

Proposed Mitigation: Since the above chart shows that the proposed zoning amendment change for a Planned Development is not consistent with the existing parcel zoning in the surrounding area, the following Alternative Plan shall be adopted: The Developer shall be required to convert the proposed 471.92 usable acres to a number of lot parcels that mimic the exact percentages of the surrounding parcels as depicted in Composite Parcel Map Figure 5.10-1, with the exception of parcel sizes that fall below 2 acres since the rural residential zoning require one dwelling per 2 acre minimums. If not, then the Developer should not be granted a zoning amendment revision for this Planned Development.

Section 5.17 Utilities and Service Systems:

IMPACT 5.17-4 Have sufficient water supplies available to serve the project from existing entitlements and resources, or would new or expanded entitlements be needed. Significance: Potentially Significant Impact.

Comment 1. In single and multiple drought years when the CVP cuts water allocations to the BVWD, the Developer or the Tierra Robles Community Services District *must provide water augmentation to the BVWD from the start of the project to total buildout of the project per the amended mitigation language 5.17-4b below.* Existing BVWD customers have successfully conserved and restricted water usage in response to recent and historical drought periods. The added water demand for this planned development will only exacerbate the finite resources of the BVWD, particularly in years when the CVP cuts water allocations.

The Amended MM 5.17-4b language below was adapted from the “Potential Mitigation language” proposed in Appendix 15.10 in Tully and Young’s Water Demand Evaluation April 26, 2017 on Page 29. The DEIR version of MM 5.17-4b gives the Developer ‘a sweet heart deal’, where the Developer or Community Service District is off the hook to purchase water until “such time as BVWD has completed 3 full years of full CVP water allocation after commencement of operations at the project site.”

The DEIR language is a bad deal for BVWD and its existing customers. For example, let’s say 3 full years of full CVP water allocations begins in 2020, the same year the Developer begins construction, which is slated to last two years (end 2022). Then in the third year of full CVP allocations (2023), construction continues or maybe lot sales begin. Let’s say that in the 4th year a single drought year occurs or it’s the start of multiple drought years. What happens? The Developer is no longer required to purchase additional water to BVWD in the fourth year or thereafter and the 166-home buildout is 10-15 years down the road, leaving BVWD and its existing customers holding an empty water bucket for the life of the buildout!

Hence prior to any approval of any project, the Planning Commission and Board of Supervisors must adopt the Amended MM5.17-4b language below:

Amend MM 5.17- 4b to read as follows: “Concurrent with the formation of the Tierra Robles Community Services District, the project applicant shall provide to the Shasta County Department of Resource Management documentation demonstrating that the applicant has secured an Agreement with the BVWD to provide BVWD with adequate water supplies on an annual basis during identified shortage conditions in a quantity that represents a minimum of 100 percent (full) of the project’s prior year water usage. Shortage conditions shall be defined to exist when BVWD has been notified by the USBR that it will receive less than 100 percent (full) allocation of its CVP water supplies for the coming delivery season, as that determination

74-e

has been announced by USBR as of April 15 of each year. THE AUGMENTING WATER SUPPLIES SHALL BE MADE AVAILABLE TO THE DISTRICT THROUGH THE AGREEMENT UNTIL THE DISTRICT HAS COMPLETED THREE YEARS OF FULL CVP WATER ALLOCATION *FOLLOWING BUILDOUT OF THE PROJECT*. For any shortage condition that occurs after three years of full CVP allocation, the project applicant shall no longer be required to provide BVWD with augmenting water supplies, but the project applicant shall then be fully subjected to the shortage provisions administered by BVWD to all its customers. The project applicant shall demonstrate that any water supply provided to BVWD under the Agreement satisfies all CEQA and NEPA compliance requirements, as well as any other permitting or regulatory approvals, as may be associated with a water supply identified in the Agreement.”

74-e
Cont.

Comment 2. BVWD Urban Water Management Plan Update – 2015 page 49 shows the actual water usage for the 2015 drought year, which excludes all agricultural water, at 335 GPPD. Each 2.5-person District home, will use 837 gallons per day. Extrapolating out, the actual yearly water demand for 166 Tierra Robles homes would be 156 AF, not the Draft EIR estimate of 80 AF.

Proposed Mitigation: Prior to approval by the Planning Commission and Board of Supervisor a new water demand analysis must be completed in conjunction with the Bella Vista Water District Engineer, based on actual rural residential demand data, so there is an accurate determination of water demand for this development at buildout. Based on these new projections new mitigation measures must be developed or enhanced.

74-f

Proposed Mitigation: The Developer and/or the Tierra Robles Community Services District will pay for the drilling of a new well in the south county water basin that ties into the BVWD system so the total water demand for the project is met and existing customers will not be impacted by the increased need for water in the District in Normal and single or multiple drought years.

Comment 3. Bella Vista Water District acknowledges “major components of the District’s water system are more than 50 years old and approaching the end of their design life.” The Draft EIR fails to mention or mitigate fluctuating water pressures to existing customers throughout the Welsh pumping system that will only be exacerbated by a concentration of 166 new homes.

74-g

Proposed Mitigation: Before approving any project, the Planning Commission and Board of Supervisors must require that BVWD (at the Developer’s expense) complete a hydraulic study of the Welsh system to ensure that all pressure issues are identified and fully mitigated.

Impact 5.17-2 – Implementation of the proposed project would not result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Noted as Less Than Significant and No mitigation measures are required.

Comment 1. The DEIR states that the Design Flow of the Wastewater treatment system is based on 200 gallons per day, per home.

As stated above, actual water usage from the severe drought year of 2015 shows tremendously more water than 200 gallons coming into the home daily. If the DEIR misstates the amount of water each home will use for residential purposes, then all the design flow data used to plan for and size the onsite black and grey Wastewater Treatment and Dispersal system must also be flawed and could cause severe environmental impacts if not corrected.

DEIR system proposes five Orenco AXMax waste treatment modules to handle the black and grey wastewater coming in for treatment. Given the history of power outages in this community, from the site schematics of the system there does not appear to be a backup electrical generator to run the pumping system for the treatment modules and to operate the necessary home pumping devices to draw out the untreated effluent.

Also, the DEIR calls for the installation of the AXMax treatment modules with three modules in Phase I and one each in Phase 2 and Phase 3. This phased in buildout of the AXMax treatment modules is unacceptable and must be completed in its entirety before any site maps are recorded by the County. The Developer and The TR Community Services District must assume full responsibility for the technical operation and sustainability of the entire system! If this Developer disappears or goes bankrupt the County and its taxpayers should not have to assume the fiscal liability to finish the system.

Proposed Mitigations: Prior to approval by the Planning Commission and Board of Supervisors a new Wastewater Treatment design flow study must be completed using actual residential water data that is consistent with BVWD rural residential homes. Also, based on this revised study the entire Wastewater Treatment System will be resized as appropriate, including additional or enlarged effluent dispersal areas, or added storage facilities and a backup generator system.

DEIR Section 5.16 Traffic and Circulation

Comment 1. While Section 5.16 and Appendix 15.9 provides much data for traffic counts and traffic delays at various intersections, projected trips on surrounding roads, average daily trips on various road segments, etc. NO vehicle speed data was measured for any of the listed road segments and the impact of speed on approaches to all the studied intersections is unknown.

74-h

74-i

Proposed Mitigation: Redo the Traffic Study to consider the impact of speed, which must be measured and assessed in compliance with accepted Caltrans standards, so that any proposed and new traffic mitigations are consistent with the analysis for all local roads and intersections studied in the DEIR. This revised thorough analysis must be completed prior to any pre-approval consideration by the Planning Commission or Board of Supervisors.

74-i
Cont.

Comment 2. The DEIR Appendix 15.9 (and presumably Section 5.16) uses older 5-year Collision data (2009-2013) from CHP's SWITRS system to generate data and assumptions about Safety Performance on studied road segments as compared with statewide averages for similar type roads, that ultimately led to DEIR mitigation proposals. The Supplemental Traffic Impact Analysis of August 2017 should have retrieved the 2014-2016 SWITRS Collision data and then created a new 5-year data set, 2012-2016, which has been available on the CHP SWITRS website.

More important the DEIR traffic methodology makes NO comment or analysis of how the expected Project increase in Average Daily Traffic (ADT) will impact rates and number of accidents for all road segments and intersections at full buildout. If a roadway already has a 38% higher rate of collisions than the state average, the DEIR does not address what the new rate and number of accidents would be given the increased ADT coming from the Project. There is no analysis of how this would affect proposed mitigations or new mitigations to lower the number and rates of accidents. The DEIR fails to even mention the school zone for Foothill High School on the Deschutes Road segment from Boyle Road to SR 44.

74-j

Proposed Mitigation: Completely revise and reassess the 5-year SWITRS Collision data using the years 2012-2016 for all studied road segments; Conduct a new Safety Performance assessment to determine which roadway segments are higher than the statewide average for similar roadways. Reconsider all the DEIR mitigations proposed or new mitigations that are needed based on the updated data. Ensure that the school zone of Foothill High School is studied and assessed for needed mitigations. This revised thorough analysis must be completed prior to any pre-approval consideration by the Planning Commission or Board of Supervisors.

The Formation of the Tierra Robles Community Services District (TRCSD):

Comment 1. The formation of the Tierra Robles Community Services District (TRCSD) promotes an entity that is overtasked, underfunded and lacking in ANY enforcement powers to ensure compliance by builders, homeowners, waste treatment operators, etc.

74-k

This proposed entity can be likened to an 'oversized' Home Owner's Association that lacks the technical expertise, and long term financial sustainability to deliver on the proposed Mitigations related to the Waste Treatment facilities, all the management and oversight of the RMA's, establishment and sustainability of all the required off-site biological areas in perpetuity. The notion that 166 homes can pay for all the required services and mitigations is preposterous.

Proposed Mitigation Before any approval by the Planning Commission and Board of Supervisors or Shasta LAFCO, there shall be a mechanism in place to ensure that the TRCSD has enforcement powers to function in a sustainable way regarding it's programmatic and financial relationship to builders, homeowners, etc.

74-k
Cont.

Comment 2. Regarding the proposed mitigation for a TRCSD purchase agreement of water in single and multiple drought years, there does not appear to be a line item for this purchase in this budget, except for landscaping watering which does not appear to be related to this contingency water purchase.

Where in the DEIR is the financial analysis of the financial condition, viability and sustainability of Shasta Red LLC? What is the mechanism for the County to ensure that all the required mitigations that will be part of the final EIR are to be delivered upon by the Developer or TRCSD, regardless of how lot sales proceed?

74-l

Proposed Mitigation: Before any approval by the Planning Commission and Board of Supervisors or Shasta LAFCO, Shasta Red LLC must submit to a financial stress test that ensures they have the financial sustainability to see this project through total buildout and the full capitalization of all final Mitigations and responsibilities for the TRCSD

Response to Letter 74 – Andrew Creasey

Response 74-a: The commenter states that the proposed project would set a precedent for rezoning, resulting in urban sprawl and increasing water demand within the Bella Vista Water District (BVWD). The commenter also states the proposed project does not meet the *General Plan or Zoning Plan*.

The commenter is referred to **Master Response-2**. In addition, the commenter is referred to **Master Response-2** regarding urban sprawl and associated “leap frog” development. The proposed project is an infill development and, although it would increase demand on water resources, it would not induce additional growth. The commenter is referred to **Master Response-3** regarding BVWD and water supply. Lastly, the commenter is referred to **Master Response-2** for a discussion of the proposed project and the *General Plan and Zoning Plan*. 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 74-b: The commenter states BVWD has outstanding commitments to serve 707 other parcels and questions demand and water supply. The commenter questions if additional restrictions to existing customers will be needed. The commenter states that BVWD water supply assumptions must be re-examined and development of the site should not occur until such assumptions are re-evaluated.

The commenter is referred to **Master Response-3** which discusses estimated water use and demand that is expected for each residence, the existing uses, existing water sources and supply as well alternative sources for water, and the effects of multiple dry years on water supply. The commenter also is referred to preceding **Responses 7-a** through **7-b**, which will provide additional information.

In reference to the 707 other parcels, the commenter is referred to page 5.17-34 or Section 5.17, UTILITIES AND SERVICE SYSTEMS, which states, discusses water supply in terms of the cumulative setting, which includes the 54 square-mile service boundary of BVWD, generally extending from Churn Creek Road on the west, the community of Palo Cedro on the southeast, the community of Mountain Gate on the northwest, and Salt Creek at SR-299 on the northeast. If the 707 units the commenter references are within the BVWD services area they would be accounted for in BVWD’s Urban Water Management Plan. Page 5.17-35 of the Draft EIR notes that these impacts would be *less than significant*.

In reference to water use restrictions, the Draft EIR addresses potential changes BVWD may implement to reduce water volumes it provides to its customers. The commenter is referred to page 5.17-4, Table 5.17-2, in Section 5.17, UTILITIES AND SERVICE SYSTEMS, which notes that BVWD’s contract with USBR provides up to 24,578 acre-feet per year (AFY) of Central Valley Project (CVP) water. Actual supplies are subject to restrictions for environmental flows, drought and the CVP M&I Shortage Policy. Draft EIR page 5.17-13 and page 5.17-26 discusses California Drought Regulations and Executive Orders that discuss restrictions and standards intended to reduce water use.

Please refer to Section 5.17, UTILITIES AND SERVICE SYSTEMS, of the Draft EIR (specifically page 5.17-28). As noted, 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. No change to the Draft EIR is required.

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 74-c: This comment is a copy of **Comment 65-p**.

The commenter is referred to **Response 65-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 and no change to the Draft EIR is necessary.

Response 74-d: This comment is a direct copy of portions of **Comment 65-p** and **65-q**.

The commenter is referred to **Response 65-p** and **65-q**. 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 74-e: This comment is a copy of portions of **Comment 65-b**.

The commenter is referred to **Response 65-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 74-f: This comment is a copy of portions of **Comment 65-c**.

Accordingly, the commenter is referred to **Response 65-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 74-g: This comment is a copy of portions of **Comment 65-e**.

The commenter is referred to **Response 65-e**. 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 74-h: This comment is a copy of portions of **Comment 65-f**.

The commenter is referred to **Response 65-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 74-i: This comment is a copy of portions of **Comment 65-l**.

The commenter is referred to **Response 65-l**. 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 74-j: This comment is a copy of portions of **Comment 65-j**.

The commenter is referred to **Response 65-j**. 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 74-k: This comment is a copy of portions of **Comment 65-r**.

The commenter is referred to **Response 65-r**. 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 74-l: This comment is a copy of portions of **Comment 65-s**.

The commenter is referred to **Response 65-s**. 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 75 – Nancy Main (December 29, 2017)

Kimberly Hunter

From: Resource Management
Sent: Friday, December 29, 2017 4:18 PM
To: Kimberly Hunter
Subject: FW: Tierra Robles DEIR Public Comments

From: Nancy Main [mailto:nancy@shasta.com]
Sent: Friday, December 29, 2017 3:57 PM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: : Tierra Robles DEIR Public Comments

To whom it may concern,

Below please find my concerns with the proposed Tierra Robles subdivision.

5.0 Description of Environmental Setting, Impacts, and Mitigation Measures

Referring to Figure 5.1-5, which is Key View 1 in figure 5.1-2 This view is taken at the end of Northgate Drive.

The Proposed picture that has a depiction of a single possible house on the property is very misrepresentative of what that view would look like after the build out no matter what color or architectural style they may be. One look at Figures 3-6 and 3-7 and the density of housing proposed would certainly change the aesthetics and visual character of the area. The proposed lots from that view would be some of the smallest as noted on the Composite Parcel Map Figure 5.10-1. Most less than the present R-R-BA-3 zoning as noted on Figure 3.5. The draft EIR concludes a less than significant impact. How can that be? Figure 5.1-5 should include all proposed house locations as close as possible for a truly accurate decision. This should also include depictions of the 6 foot high fences allowed surrounding building envelopes and the entitlement of each lot to build accessory dwelling units.as noted on page 3-16 pursuant to Government Code 65852.2. There also seems to be a discrepancy between Figures 3-6 and 3-7. Figure 3-7 shows 5 lots running north on the west side of the proposed road Tierra Robles terminating at the end of Northgate Drive while Figure 3-6 shows 5. Which is the correct number as that would be a very visible lot?

Referring to Figure 5.1-6, which is Key View 2 in Figure 5.1-2. This view taken from Boyle Road at what is the proposed main entrance to the Tierra Robles subdivision.

The same issues of misrepresentation of the final build out as noted above apply but this view would be seen much more by the public and would be altered more severely since the proposed lots run narrow along a straight road. The building envelopes all run close (clustered) to this road as well. This would create a look of a suburban subdivision not a rural one which is what the area has been zoned for. 5.1-15 proposes that the residential units would appear generally similar in massing and scale to the existing development to the west. When actually comparing the two developments there are almost 2 proposed lots next to each other for every 1 in the adjacent development. The topography of these proposed lots is flat. The adjacent development has relief creating a very different look and feel. .

Changing the zoning in the area would alter the look and feel of this rural community. No zoning changes should be made especially on the scale of this proposal. This would also open up the opportunity for other developers to ask for such changes on large scales further degrading the rural aspect of the surrounding area.

75-b

Further comments involve the water issue and Bella Vista Water's ability to provide enough water to it's customers especially in drought years. Last year's rain season was a great one but here we are next season and exceedingly dry so far. I spent three years under water restrictions and would rather not make the next one sooner by allowing rezoning and irresponsible development. It was noted on the individual lot maps that they each had a possible location for a pool. Would that be allowed under the constant threat of drought, water restrictions and potential increased water rates as a result?

75-c

Noted in the Executive Summary, page 2-6 that Northgate Drive is proposed as an emergency access. No notice was given to the Northgate Owners nor has any such permission been given. No official easement has ever been issued to the present owner of the Tierra Robles property that I am aware of. How can this happen without the Northgate Property owner's permission? Would Northgate be improved at Tierra Robles expense if we have no say whether we agree to the emergency designation? The road presently is not up to County fire or Cal Fires' standards required for such an access.

75-d

Thank you for your consideration of my concerns in these matters.

Nancy Main
10697 Northgate Drive
Palo Cedro, CA 96073

Response to Letter 75 – Nancy Main

Response 75-a: The commenter states Figure 5.1-5 is misrepresentative, should include all home locations, fencing, building envelopes, and accessory units and questions the *less than significant* impact finding. The commenter also notes a discrepancy in the lots on Figures 3-7 and Figure 3-6. The commenter states the description of homes and views of the proposed homes at the intersection of Tierra Robles Boulevard with Boyle Road are misrepresented, and would not appear generally similar in massing and scale because the proposed project is more dense than existing adjacent developments, adjacent development has a different look and feel, and the topography is flat.

Regarding Figure 5.1-5, the commenter is referred to page 5.1-15 in Section 5.1, AESTHETICS AND VISUAL RESOURCES. The commenter disagrees with the findings of the Draft EIR which relates that due to the limited grading, preservation of most surrounding vegetation, the views north would maintain a similar visual character. In addition, the Draft EIR states that the homes would be comprised of earth tones, would be similar in terms of mass and scale to surrounding residences. Because of these factors, impacts were found to be *less than significant*.

Regarding the discrepancy between figures, page 3-13 and 3-17 show Figures 3-6 and 3-7, respectively. Figure 3-6 provides a representation of the proposed tentative map, while Figure 3-7 represents the proposed phases of the project. All residential lots are numbered in Figure 3-7, and show a proposed 166 residential areas, just as Figure 3-6 depicts. Figure 3-7 also includes lines representing drainages within the project site. This could result in areas that may appear to be residential; however, these areas depicted as drainages are not numbered because they are not proposed for residential units. In reviewing the figures, the Lead Agency determined that there is an extra line on Figure 3-7 that appears to depict a residential lot adjacent to the northwest corner of the project area and intersection with Northgate Boulevard; however, this is not a residential lot and does not contain a number assigned to it as the other residential lots do on Figure 3-7. There is no proposed residence at this location. No further response is necessary and no change to the Draft EIR is necessary.

Regarding the analysis in the Draft EIR of views from Key View 2 (Figure 5.1-6) and views from motorists on Boyle Road and from adjoining residential uses, page 5.1-15 of Section 5.1, AESTHETICS AND VISUAL RESOURCES, of the Draft EIR discloses that project implementation would change the character of the area as a result of the addition of hardscape and massing from the new residential structures. The Draft EIR concludes, however, that through similar massing and scale and the use of earth tone exteriors to reduce contrast with the natural landscape, impacts to the character and quality of the proposed project site and its surroundings, as seen from Key View 2, 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 75-b: The commenter states that changing the zoning would alter the feel of the rural community, no changes should be made, and it would create an opportunity for other developers to do the same and degrade other areas.

The commenter is referred to **Master Response-2** regarding the zone change and setting a precedent for other development.

The commenter is referred to page 6-5 in Section 6.0, GROWTH-INDUCING IMPACTS, which discusses, “leap frog” development. The Draft EIR concludes that the proposed project is consistent with surrounding land use patterns and fills in a gap between developed areas, which is the opposite of “leap frog” development. In addition, the Draft EIR concludes the proposed project would result in a contiguous development pattern within the area, would be accessed by the existing transportation network, and includes utility infrastructure to serve increased demand. For these reasons, the proposed project is not considered a “leap frog” or “premature” type of development. 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 75-c: The commenter comments on Bella Vista Water District’s (BVWD) ability to provide enough water questioning that if under drought and water restrictions could pools be allowed.

The commenter is referred to **Master Response-3** and preceding **Responses 7-a** through **7-p**, regarding water supply and availability. The commenter is referred to Section 3.0, PROJECT DESCRIPTION, which discusses the potential for future residences to have a pool. 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 75-d: The commenter notes that Northgate Drive is shown as a proposed emergency access. The commenter states that no notice to owners was given, and asks how this can happen without property owner’s approval.

It should be noted that since preparation and circulation of the Draft EIR, it has been determined that the proposed emergency access at Northgate Drive is not required and has therefore been omitted from the proposed project. No further response is necessary.

Letter 76 – Terri Thompson (December 29, 2017)

RECEIVED

DEC 29 2017

County of Shasta
Building Division

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

December 26, 2017

Mr. Hector:

I am writing to voice my opposition to the planned development by Geringer Capital of Beverly Hills on land west of Deschutes and South and East of Old Alturas Road lying North of Boyle Road.

76-a

We have lived on Easy Street which is South off Old Alturas and directly West of a portion of this plan for more than 30 years. For Mr. Geringer to say that no one would notice the development is absolutely ludicrous. I don't appreciate the idea of someone coming here from Southern California to tear up the nature of our surroundings for a quick buck.

In a drought year, there is not enough water as it is for our neighborhood and surrounding area. I find it hard to believe that this planned development would have enough water – only that it would be taking away from the rest of us who have built our lives here.

76-b

The natural beauty of the area would be destroyed. The wildlife (deer, turkeys, owls, bats, numerous bird varieties, and more) would be run out of their homes. As it is, they are running out of places to live, all in the name of "more development".

76-c

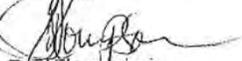
I sincerely hope that your department, the department of fish & game/wildlife, water district(s) and all others involved have really taken a serious look at what will happen if this is allowed.

76-d

Those of us that have been in this area for most of our adult lives are here for the beauty, serenity and natural beauty of the area. We've started and raised families here and I am not alone in saying we don't want that destroyed.

76-e

Sincerely,



Terri Thompson
11321 Easy Street
Redding, CA. 96001

Response to Letter 76 – Terri Thompson

Response 76-a: The commenter makes statements about being opposed 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 76-b: The commenter states there is not enough water and the proposed project would be taking water from existing residents.

The commenter is referred to **Master Response-3** which provides additional detail about Bella Vista Water District (BVWD) and water supply. 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 76-c: The commenter states that the natural beauty of the area would be destroyed and wildlife would be forced from the area.

The commenter is referred to Section 5.1, AESTHETICS AND VISUAL RESOURCES, for a discussion of visual impacts of the proposed project, and is referred to Section 5.4, BIOLOGICAL RESOURCES, and preceding **Responses 3-a** through **3-v** for additional discussion of impacts to wildlife. 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 76-d: The commenter provides a statement suggesting that both the Department of Fish and Wildlife (CDFW) and BVWD review the project.

The commenter is referred to preceding **Responses 2-a** through **2-g** for comments from the Central Valley Regional Water Quality Control Board (CVRWQCB), preceding **Responses 3-a** through **3-v** for comments from CDFW, and preceding **Responses 7-a** through **7-p** for comments from BVWD. 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 76-e: The commenter states opposition to the project and does not want the serenity, beauty of the area destroyed.

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 77 – Gary and Angela French (December 29, 2017)

Kimberly Hunter

From: Resource Management
Sent: Friday, December 29, 2017 2:07 PM
To: Kimberly Hunter
Subject: FW: Tierra Robles DEIR Public Comments
Attachments: Tierra Robles letter.pdf

From: Angela French [mailto:angela.celeste.french@gmail.com]
Sent: Friday, December 29, 2017 1:36 PM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: Tierra Robles DEIR Public Comments

Please find comments in attached pdf.

Please acknowledge receipt.

Thank you,

Gary and Angela French

77-a

Angela and Gary French
10705 Green Oaks Ln.
Redding, CA 96003
angela.celeste.french@gmail.com

December 28, 2017

Shasta County Dept. Resource Management
Planning Division
Attn: Kent Hector, senior planner
1855 Placer St.
Redding, CA 96001
resourcemanagement@co.shasta.ca.us

Re: Tierra Robles proposed development

Dear Mr. Hector and planning committee members:

As new homeowners in Shasta county abutting the proposed Tierra Robles development, we are writing to express our concerns regarding what so far appears to be an injudicious plan.

We bought property in this area as a stake toward seeing this area grow and begin to emulate cities that have successfully melded rural country atmosphere with culture and commerce. Therefore, we applaud wise forward-thinking planning toward area growth.

77-a

However, we believe the Tierra Robles proposed development stands in stark contrast to that vision, primarily due to its proposed population density:

1. The Environmental Impact report's (EIR) suggested mitigation for increased traffic from the proposed 166 home build out is insufficient. It is particularly disturbing that at least some of the data used for the EIR's traffic impact analysis stems from old data (before 2013) when more up-to-date data is available through the California Highway Patrol's SWITRS system.

Since our lane empties into Boyle Rd., we can attest that an additional 1600+ new daily vehicle trips (statistics taken from Record Searchlight and East Valley Times) will significantly increase the risk of collisions and fatalities.

77-b

As the developer's proposal now stands, the increase in population density demands not only a roundabout and traffic light as suggested by the EIR, but also widening of roads, additions of bike lanes, and additions of turn lanes. Anything less puts residents at significant risk. Any pre-approval consideration by the Planning Commission should be put on hold until the traffic study is redone using current data and taking vehicle speeds into account.

2. Another issue in the EIR is related to water usage. The EIR apparently based its suggested mitigation for the development's additional water needs on an estimated 80 AF yearly, but extrapolating from Bella Vista Water District's (BVWD) Water Management Plan and actual

77-c

water usage for 2015, 80AF is a significant *underestimate*. The numbers should be closer to 156 AF. Given the severe water cutbacks experienced by area residents in 2015 - a declared water shortage emergency - the EIR mitigation for water needs seems like a sweet deal for the developer. Given that in single and multiple drought years Central Valley Project cuts water allocations to BVWD, it is imperative that the developer provide water augmentation to BVWD from the start of the project to total build out of the project. Additionally, given the "new normal" of drought years, the developer should be tasked with the drilling of a new well in the south county water basin to tie into BVWD's system so needs of existing BVWD customers will not be impacted by the increased need for water in single or multiple drought years.

77-c
Cont.

Finally: Personally speaking, we can attest that prospective residents with capital to invest will be looking at this area to get away from urban sprawl and daily traffic issues. The proposed development sets a dangerous precedent toward rezoning rural and semi-rural areas that may very well cost Shasta county new and moneyed residents. By all means, let Geringer Capital drop their money into Shasta County and build luxury homes that will appeal to those who can bring economic growth to the area - but make them do it on *our* terms within a long-term forward thinking vision.

77-d

To that end Geringer Capital should be required to convert the usable acres to a number of lot parcels that mimic the percentages of surrounding parcels. This will not only help toward mitigation of the above stated concerns, but maintain the area's atmosphere that will, ultimately, attract residents capable of supporting and innovating real economic growth.

Thank you for your consideration of the above concerns.

Sincerely,


Gary French


Angela French

Response to Letter 77 – Gary and Angela French

Response 77-a: The commenter states opposition to the proposed project stating they are new homeowners to the area and believe the proposed project conflicts with surrounding rural uses and the country atmosphere.

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 77-b: The commenter states that mitigation for traffic impacts is not sufficient and the more current data from California Highway Patrol's SWITRS system should be used. The commenter states that the risk of fatalities and collisions will increase on Boyle Road. The commenter also states that additional mitigation should include widening roads, additions of bike lanes, and turn lanes to reduce risks. The commenter suggests the project be put on hold until the traffic study is redone and accounts for vehicle speed.

The commenter is referred to preceding **Response 57-i** regarding the request to require applicant to the widen roadways and how it would conflict with the requirement of mitigation to be roughly proportionate as prescribed by State *CEQA Guidelines* §15041(a).

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, 57-l, 65-l, 65-n, and 65-o**. These responses to comments provide discussion regarding traffic impacts, safety, and mitigation. The commenter is referred to **Responses 5-f, 17-p, and 57-i** regarding fair share funding. 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 77-c: The commenter states that the water use rates in the Draft EIR are inadequate and a significant underestimate and the numbers should be closer to 156 acre-feet. The commenter states the developer should provide water augmentation to BVWD and the developer should drill a new well in the south county water basin to tie into BVWD so existing customers will not be impacted.

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 and no change to the Draft EIR is necessary.

Response 77-d: The commenter states the proposed project sets a precedent to rezone other rural and semi-rural areas of Shasta County. The commenter states the proposed project should be required to include lots that mimic the surrounding parcels to maintain the existing atmosphere.

Regarding a precedent setting rezone, the commenter is referred to Section 6.0, GROWTH INDUCING IMPACTS. Regarding varying use of lots, the commenter is referred to Section 7.0, ALTERNATIVES TO THE PROPOSED PROJECT, which discusses a reasonable range of different project configurations and **Master Response-2** which also discusses alternatives, as well as the *Zoning Plan* and *General Plan*. 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 78 – Glenn and Sara Hoxie (December 29, 2017)

Kimberly Hunter

From: Resource Management
Sent: Friday, December 29, 2017 12:57 PM
To: Kimberly Hunter
Subject: FW: Tierra Robles Public Comments

From: SARA CRANDELL-HOXIE [mailto:roadrunnerfarm@sbcglobal.net]
Sent: Friday, December 29, 2017 12:11 PM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: Tierra Robles Public Comments

December 28, 2017
Kent Hector, Senior Planner,
Shasta County Department of Resource Management, Planning Division, 1855 Placer St., Suite 103,
Redding, CA 96001

Dear Mr. Hector,

We have reviewed the the Draft Environmental Impact Report for proposed Tierra Robles subdivision and have concluded that it is not adequate in addressing the water deficits in this region of Shasta County. It also does not comply with the counties General Plan. Infrastructure such as wastewater treatment are not adequately addressed, nor is traffic and its impact on area roads and schools.

Droughts are the new normal. We are currently experiencing a drought. Existing residents were allocated water in the last drought. There is simply not enough water in this part of rural eastern Shasta County to sustain a subdivision. The DEIR does not adequately address this deficit. It does not address the needed water over time and the sources of this water. There is insufficient data on future water demands of the area and how theses demands will be met. Water usage statistics used in the DEIR are not consistent with actual water district data. Language in the DEIR leaves the Bella Vista Water District and existing customers paying for new sources of water if a drought occurs several years into the building of the development. That is if ancillary water can even be delivered in the future. This is unacceptable. The water district and the current residents must be protected from this liability.

If the planned development comes to fruition and other developments are installed in the area due to the precedent set by Tierra Robles, what water source will be used? Furthermore it the DEIR states that a development would have a "significant impact" on groundwater. This is a rural area, groundwater is a precious resource for existing residents. This cannot be compromised.

Tierra Robles is not in compliance with the general plan for the county. It violates zoning requirements. Existing zoned parcel sizes require this area to be rural/agricultural. The DEIR is contradictory when stating whether this area would be considered rural or semi rural. In any case the

change in parcel size with this planned development will be in direct violation of the general plan for Shasta County. A zoning amendment would cause

parcel sizes to be inconsistent with the surrounding area. The existing zoning regulations are sustainable, an exception would not be sustainable and would likely result in setting a precedent causing more development in this area thus further violating the general plan and further compromising sustainability for all who currently reside in the area.

The projected water usage is based on faulty data and therefore the need for adequate water treatment is also understated. The plan to treat wastewater must be rewritten using the actual data on water usage and be mitigated accordingly.

Boyle Road is a thoroughfare connecting several schools including Columbia School, Foothill High School and North Cow Creek School. There are other schools linked by area roads including Redding Christian School, Chrysalis Charter School, Junction School and Bela Vista School. The DEIR does not address speeds on these roads. Antidotally I observe most private vehicles traveling on Boyle Road to be traveling in excess of 50 MPH. All schools have students who live in the area. Several have busses that use Boyle Road, Old Alturas Road and Deschutes Road. The safety of students with increased traffic flow is a great concern. Speed was not a factor in the DEIR yet speed related accidents occur on these roads frequently.

This type of leapfrog development is not sustainable in terms of water use and infrastructure. The county plan as it stands is sustainable for this area. Tierra Robles Subdivision is ill conceived and poorly planned. The DEIR omits important data and leaves existing land owners with an unknown future costs not carried by the developer. For these reasons we are opposed to this development.

Sincerely,

Glenn and Sara Hoxie
10024 Roadrunner Way Redding, Ca 96003

(530) 221-7057

78-a
Cont.

Response to Letter 78 – Glenn and Sara Hoxie

Response 78-a: These comments are duplicate copies from ***Comment Letter 73***.

The commenter is referred to preceding ***Responses 73-a*** through ***73-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.