Letter 79 – Irene and Jason Salter (December 29, 2017)

Kimberly Hunter

From:	Resource Management
Sent:	Friday, December 29, 2017 3:36 PM
To:	Kimberly Hunter
Subject:	FW: Tierra Robles

-----Original Message-----
From: Irene Salter [mailto:iysalter@gmail.com]
Sent: Friday, December 29, 2017 3:15 PM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Cc: Jason P. Salter <jason@fivepaths.com>
Subject: Tierra Robles

Dear Resource Management,

My husband and I would like to voice our concerns about the Tierra Robles planned development and DEIR. We own a home on 9.4 acres on Coloma Drive, Palo Cedro and are very concerned that rezoning would 1) set an unnecessary precedent for rezoning within our lovely rural community, 2) would negatively impact traffic patterns, and 3) would negatively impact water usage and infrastructure. As the principal of Chrysalis Charter School with over 220 students in grades K-8, I would welcome population growth. However, I see the Tierra Robles project as currently proposed as an example of irresponsible growth that disregards established zoning regulations and does not fully nor carefully consider pedestrian/bike safety and water usage. 79-a

1) Rezoning
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". This zoning amendment should NOT be granted because the proposed development DOES NOT meet the current standards in our area and goes against the County General Plan and Zoning Regulations. The DEIR itself admits that "the proposed project would alter current conditions on the site" and would change the region from "rural" to "semi-rural". 79-b

There is no need to make an exception to the current zoning requirements. The developer should be required to mimic the percentages of the sizes of surrounding parcels and conform to the 3 acre minimum requirement for rural residential zoning. There are plenty of sites available for infill closer to Redding before a large new development is considered for the out-lying rural neighborhoods like Palo Cedro and Bella Vista. The current zoning in our area was established for good reason after considerable input from the community. Zoning exceptions should only be granted when there is a clear benefit to the surrounding community. We do not see any such benefit with this project.

2) Traffic
The projected increase in traffic along Boyle, Deschutes, and Old Alturas would negatively impact the safety of our neighborhoods. No vehicle speed data was measured on the traffic study and that is an issue of grave concern to my husband and I. We have 2 small children and it is completely unsafe for them to be anywhere near Boyle or Deschutes (our home is 1 block from these roads). The cars along those stretches zoom along at over 60 miles per hour, even in the 40 mph area near Foothill High School and Palo Cedro town where Chrysalis and Redding Christian School are located. Chrysalis is known for its outdoor focus and our students walk to Palo Cedro Park weekly for field study and our students often cross the intersection at Old 44 and Deschutes to go to Dutch Bros after school. It is incredibly dangerous for our students to cross Deschutes on their way to the Park or Dutch Bros. NONE of our students can safely walk or bike to school. 79-c

1

Therefore, a new Traffic Study must be conducted to examine the impact of speed on pedestrian and bike safety, with emphasis on the areas around Foothill High School, Chrysalis Charter School, and Redding Christian School. These areas should be carefully assessed for necessary safety mitigations. 79-c Cont.

3) Water
The DEIR estimate of 80 AF per household per year is incorrect. The actual annual water demand based on actual water usage for 2015 is 156 AF. These accurate projections must be taken into consideration in the planning process. Moreover, with climate change, the frequency and intensity of droughts in our area will only increase. These factors — water usage and climate change — will impact Bella Vista Water District's plans for providing sufficient water and taking care of wastewater. 79-d

Therefore, before approving this project correct estimates of water demand must be considered so that existing customers will not be impacted in single or multiple drought years and so that water infrastructure such as wells and water water treatment facilities are resized appropriately. Any mitigation efforts should be at the Developer's expense.

In conclusion, there is no reasonable argument for rezoning. The DEIR fails to fully consider student safety in school areas. And the DEIR fails to use the correct estimates for water usage. Before approval, these factors must be considered. My husband and I do not support the current Tierra Robles proposed development. 79-e

Thank you for your consideration.

Sincerely,
Irene and Jason Salter
21935 Coloma Dr.
Palo Cedro, CA 96073

2

Response to Letter 79 – Irene and Jason Salter

Response 79-a: The commenter notes they live in the area and are concerned that the proposed project would set a precedent regarding rezoning. The commenter also voices non-specific impacts to traffic, and water use and infrastructure, and that the proposed project does not fully or carefully consider pedestrian/bike safety and water use.

The commenter is referred to Section 6.0, GROWTH INDUCING IMPACTS, and ***Master Response-2*** regarding the proposed rezoning and the project's potential to result in a precedent setting action. The commenter is referred to ***Master Response-3*** and preceding ***Responses 7-a*** through ***7-p*** regarding the Bella Vista Water District (BVWD), BVWD's water supply representations, and the project's water use. The commenter is also referred to preceding responses under ***Response 4-b, 13-e, 14-b,*** and ***48-k*** regarding responses specifically related to traffic and pedestrian and bicycle safety. 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 79-b: The commenter states that the rezoning for the proposed project should not be granted and does not meet the current standards and goes against the zoning ordinance and general plan. The commenter states there is no need to make such an exception and the developer should be required to mimic surrounding development with 3-acre lots.

The commenter is referred to page 7-10 of Section 7.0, ALTERNATIVES TO THE PROPOSED PROJECT, of the Draft EIR, which describes the "Clustered 3-Acre Parcels" Alternative. This alternative would result in the development of 166 single family units on 3-acres parcels. This alternative too, however, would require a zone change from Unclassified (U), Rural Residential 3-Acre Minimum (RR-BA-3), and Rural Residential 5-Acre Minimum (RR-BA-5) to Planned Development (PD) on the 715.4-acre project site to allow development of the 166 single-family units. This alternative was removed from consideration however, because it did not fully meet several Project Objectives and because several environmental impacts in all environmental categories would be greater than those of the proposed project. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 79-c: The commenter states that traffic increases would negatively impact traffic safety. The commenter notes that no speed data was measured and vehicles on area roadways and gives examples of schools in the area and states it is dangerous for people and school children to cross area roadways and states none of their students can safety walk or bike to school and a new traffic study must be conducted with emphasis around Foothill High School, Chrysalis Charter School, and Redding Christian School and mitigated.

The commenter is referred to preceding ***Response 17-f*** related to bicycle safety, and ***17-n*** and ***17-o*** related to roadway safety and pedestrian safety as well as mitigation to reduce impacts to *less than significant* levels. As discussed, improvements by the

County for Boyle Road, Old Alturas Road, and Deschutes Road would include shoulder improvements that would serve to enhance existing and future pedestrian movement within the area. The Draft EIR concluded that impacts would be *less than significant*. No change to the Draft EIR is required. In regards to the evaluation of traffic speed, the commenter is referred to preceding ***Response 65-l*** which provide further discussion related to speed of traffic. ***Responses 43-b*** and ***48-k***, above, are specific to traffic impacts and school zones. 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 79-d: The commenter notes that the Draft EIR incorrectly estimates water use at 80 acre-feet per household per year and the actual demand is 156 acre-feet and this must be taken into account in the analysis and also will change impacts the wastewater treatment plant and states that mitigation must be at the developer's expense.

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 necessary.

Response 79-e: The commenter restates concerns about rezoning, student safety, and water, and states they must be considered prior to approval, and reiterates lack of support for the proposed project.

The commenter is referred to ***Responses 79-a*** through ***79-d***, immediately above. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Letter 80 – Carol & David Waters (December 29, 2017)

Kimberly Hunter

From:	Resource Management
Sent:	Friday, December 29, 2017 8:31 AM
To:	Kimberly Hunter
Subject:	FW: Comments on the Tierra Robles 2016 DEIR
Attachments:	1 Tierra Robles 2016 DEIR Comments.docx

From: David Waters [mailto:dwaters@frontiernet.net]
Sent: Friday, December 29, 2017 5:16 AM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: Comments on the Tierra Robles 2016 DEIR

Having been residents of Palo Cedro for 39 years, residing off Boyle Road, we are concerned that our rural lifestyle and amenities will be adversely impacted by the proposed Tierra Robles project. After reviewing the draft 2016 DEIR, there appear to be potentially many negative effects that have been inadequately mitigated should the Tierra Robles project be approved as outlined in the current DEIR. Therefore, we are taking this opportunity to note some of the areas of the DEIR that we take exception to and offer some additional input as noted in the attached document. 80-a

These concerns, along with many other identified issues, beg the question: Is the placement of the Tierra Robles development in Palo Cedro area a good idea? We think the answer is a resounding no and urge that approval of the project as currently outlined in the 2016 DEIR be denied unless the significant impacts to zoning, water supply, traffic, and other identified key issues are addressed 80-b

Thank you for the opportunity to present our views on the TR project and especially for the extension of the public comment period.

Sincerely,

Carol & David Waters
10303 Jackson Hole Rd.
Palo Cedro, CA 96073
530-549-5669

1

Tierra Robles DEIR Comments Carol & David Waters | 10303 Jackson Hole Rd. | Palo Cedro CA

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: 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!

80-c

Therefore, prior to any approval of the TR project, the Planning Commission and Board of Supervisors should consider amending MM5.17-4b as follows:

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 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."

Comment 2. The DEIR severely underestimates by nearly double the amount of water that will be taken from the finite resources of the Bella Vista Water District system. The DEIR erroneously estimates the total indoor and outdoor water demand for 166 homes at 80 Acre Feet (AF) per year. Real-world water demand estimates should come from page 49 of Bella Vista Water District's Urban Water Management Plan Update 2015 (UWMPU) using actual 2015 water use data, which reflects the severe CVP water allocation cutbacks and an extreme customer conservation effort.

80-d

The UWMPU 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. Based on these new projections new mitigation measures must be developed or enhanced.

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. 80-d Cont.

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. 80-e

Proposed Mitigation: Before approving any project, the Planning Commission and Board of Supervisors must insist 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.

Section 5.17 Utilities and Service Systems (continued)

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 erroneously estimates the total water demand for 166 homes at 80 Acre Feet (AF) per year for indoor and outdoor use. The indoor water usage estimates come from the State's 55 gallons per person per day data, which extrapolates to 137.5 gallons per home per day, based on a 2.5-person occupancy. The DEIR states that the Design Flow of the Wastewater treatment system is based on 200 gallons per day, per home.

As stated in Comment 2 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. 80-f

The DEIR system proposes five Orenco AXMax waste treatment modules to handle the black and grey wastewater coming in for treatment. 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 draw the untreated effluent from the homes.

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. The 2016 DEIR plan for a phased 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.

DEIR Section 5.16 Traffic and Circulation

Impact 5.16-3 "Implementation of the proposed project may result in inadequate emergency access."

Comment 1. Under "Long Term Operation" this impact should read "non-existent" emergency access, not "inadequate emergency access". The Draft EIR states that No mitigation measures are required and that the impact would be less than significant. This could not be further from the truth. 80-g

The Draft EIR calls for northern terminus of Northgate Drive to intersect with the southerly terminus of Tierra Robles Lane to provide the project with a secondary emergency access road.

Northgate Drive is a Private Road and only the 28 homeowners on this road have legally recorded easements which only grants them use of Northgate Drive.

In the Executive Summary, page 2-6, "Site Access and Roadways" it states, "The southerly terminus of Tierra Robles Lane is at the northerly terminus of Northgate Drive, a road used for over 40 years as access to the southeast corner of the proposed project site. The proposed connection with Northgate Road (Drive) would be gated per County fire standards and used for reciprocal emergency access only." The parcel number containing the terminus of Tierra Robles Lane is APN-061-210-001.

County deed records for parcel APN #061-210-001 indicate there is no legally recorded easement for the subject property, by the current owner, Shasta Red LLC, nor the previous owners, Landmark Investment Group, RHS NorCal Investments LLC and UJB Investments LLC nor the previous owners, Chatham Family 1991 Trust and Harryette Chatham J-TR, nor the previous owners, Harryette and Gordon Chatman. 80-g Cont.

The only legal description for APN-061-210-001 is: "North One-Half of Lots 1 and 2 of the Northwest One-Quarter, Section 30, Township 32 North, Range 3 West, M.D.B &M." There is no recorded easement for access to the adjacent parcel that includes Northgate Drive in that or any other parcel description.

While there may be a history of Northgate Drive being used to move grazing cattle on and off the subject property and to allow access for bee farming, these were limited uses for agricultural purposes only and is not consistent with the purpose of a Planned Development. Again, no legally recorded easement exists.

Proposed Mitigation: The DEIR designation of Northgate Drive as an emergency access road must be removed from all current and future site maps and the developer must determine a new emergency access road, other than Northgate Drive.

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 DREI 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. 80-h

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.

Comment 3. 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. 80-i

For example, we have observed that vehicle speeds on Boyle Road and surrounding roads reveals two-way, peak A.M and P.M traffic speeds that are significantly higher than the speed

limit. This is particularly true for the many cars traveling to and from Cow Creek Elementary and Foothill High Schools and/or driving to work in Redding.

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. 80-i Cont.

Comment 4. According to DEIR data there will be 1,774 added trips per day to surrounding roads and intersections. The Project Trip Distribution Map on page 5.16-16 shows Boyle Road will have 80% of new projected trips with 61% of trips going towards Old Alturas Road and 19% going towards Deschutes Road. This indicates the Tierra Robles Entrance/Exit at Intersection 18 (Boyle Road and Project Road A) will have by far the highest volume of traffic entering and exiting the development versus the entrance/exit intersection 3 at Old Alturas and Seven Lakes Roads.

Intersection 18 has not been evaluated to ensure safe turning into and out of the development so that Boyle through traffic is safely accommodated, particularly during peak A.M. and PM times. The DEIR only proposes a two-way stop sign mitigation for this congested, high speed intersection. 80-j

Proposed Mitigation: To ensure safe, unimpeded through traffic on Boyle Road, use the Tierra Robles property frontage to adjust Boyle Road for the installation of a dedicated left turn lane into the development. For vehicles turning left out of the Project onto Boyle, install a left turn access lane that adds cars safely into the flow of Boyle through traffic. This revised thorough analysis must be completed prior to any pre-approval consideration by the Planning Commission or Board of Supervisors.

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 the 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! 80-k

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:

Acreage	Lotting Description	% Parcels	# of Surrounding Parcels**	% of Surrounding
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 for a Planned Development. 80-k Cont.

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. 80-l

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, and homeowners, etc.

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.

How does the TRCSD propose to enforce any of the CC&Rs or the collection of the requisite annual fees that the TRCSD needs to finance its activities and responsibilities?

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? 80-m

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 80 – Carol & David Waters

Response 80-a: The commenter states they are concerned about the rural lifestyle of the area make a non-specific statement about many areas being inadequately mitigated and suggest input in the subsequent comments.

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 80-b: The commenter reiterates that they are concerned about the project, urge it not be approved unless the significant impacts to zoning, water supply, traffic and other issues are resolved.

The commenter is referred to ***Master Response-2*** regarding zoning and densities. Refer to ***Master Response-3*** and preceding ***Responses 7-a*** through ***7-p*** regarding water supply. Refer to preceding ***Responses 4-b*** and ***13-e*** regarding traffic impacts, safety, and mitigation. The commenter is referred to preceding ***Responses 5-f, 17-p***, and ***57-i*** regarding fair share funding. ***Responses 43-b*** and ***48-k*** are specific to traffic impacts and school zones. 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 80-c: This comment is a copy of portions of ***Comment 65-b***.

The commenter is referred to preceding ***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 80-d: This comment is a copy of portions of ***Comment 65-c***.

The commenter is referred to preceding ***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 80-e: This comment is a copy of portions of ***Comment 65-e***.

The commenter is referred to preceding ***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.

Response80-f: This comment is a copy of portions of ***Comment 65-f***.

The commenter is referred to preceding ***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 80-g: This comment is a copy of portions of ***Comment 65-g***.

The commenter is referred to preceding ***Response 65-g***. 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 80-h: This comment is a copy of portions of ***Comment 65-g***.

The commenter is referred to preceding ***Response 65-g***. 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 80-i: This comment is a copy of portions of ***Comment 65-g***.

The commenter is referred to preceding ***Response 65-g***. 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 80-j: This comment is a copy of portions of ***Comment 65-m***.

The commenter is referred to preceding ***Response 65-m***. 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 80-k: This comment is a copy of portions of ***Comment 65-p*** and ***65-q***.

The commenter is referred to preceding ***Responses 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 80-l: This comment is a copy of portions of ***Comment 65-r***.

The commenter is referred to preceding ***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 80-m: This comment is a copy of portions of ***Comment 65-s***.

The commenter is referred to preceding ***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 81 – John Witmer (December 29, 2017)

Kimberly Hunter

From: Resource Management
Sent: Friday, December 29, 2017 8:30 AM
To: Kimberly Hunter
Subject: FW: Concerns about Tierra Robles

From: John Whitmer [mailto:john.whitmer@yahoo.com]
Sent: Thursday, December 28, 2017 6:05 PM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: Concerns about Tierra Robles

To Whom It May Concern:

I live on Northgate Drive in Palo Cedro. The proposed Tierra Robles project will negatively affect my property, property value, and quality of life. If the county agrees to make changes to the existing zoning restrictions by approving this project, I will seek political and legal remedies to recoup my losses. Northgate Drive will become the second (emergency) road for the development. This means increased traffic and road improvements that require private funds and tax dollars--thereby charging Northgate residents twice. Easements to widen the road will reduce property and construction of development and road widening will negatively influence quality of life for the residents. Shrinking the required lot sizes will flood the market and reduce housing prices. All of this is being done to allow an absentee investor to make money. Why should the county as well as current tax-paying residents have to subsidize the profit of one investor? 81-a

Please make the right decision by not making exceptions to long-standing zoning codes; they are there for a reason.

John Whitmer
10659 Northgate Drive
Palo Cedro, CA 96073

1

Response to Letter 81 – John Witmer

Response 81-a: The commenter states the proposed project will negatively affect property values and quality of life and resulting in increased taxes, use of easements, increased traffic by changing the zoning restrictions, and use of Northgate Drive for emergency access, but the commenter does not make any comment or questions the adequacy of the Draft EIR. The commenter also restates that emergency access on Northgate Drive will be used and impact nearby residents.

No issue or adequacy of the Draft EIR was raised by the commenter. The commenter is referred to ***Master Response-2*** regarding zoning and density. 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*** address project-related traffic impacts, safety, and mitigation. The commenter is also referred to preceding ***Responses 5-f, 17-p***, and ***57-i*** regarding fair share funding.

It should be noted that since preparation and circulation of the Draft EIR, the proposed emergency access at Northgate Drive has been omitted from the proposed project. No further discussion is necessary.

Regarding increased property taxes State *CEQA Guidelines* §15126 discusses that all phases of a project must be considered when evaluating its impact on the environment. State *CEQA Guidelines* §15360 defines the 'Environment' as the physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. Therefore, discussion of the potential for increases related to local property taxes are omitted from the CEQA analysis.

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 82 – Leah Mecchi (December 29, 2017)

Mr. Kent Hector
Shasta County Resource Management, Planning Dept
1855 Placer St. Suite 103
Redding, Ca 96001

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DEC 29 2017
County of Shasta
Permit Counter

Tierra Robles Subdivision.

I have been a resident of Palo Cedro for more than 10 years. I've been in and out of area my entire life. I moved here for the rural lifestyle. I used to live in Brentwood, Ca (Northern Ca) when it was small like Palo Cedro, rural, farming and small ranches. Then the first subdivision moved in. It ruined rural ranching in Brentwood. It ruined the lifestyle. It impacted wildlife, crime rose and ranchers moved out. Look what it is today. I left before it was ruined and so did many people I know. 82-a

I fear the same thing will happen to Palo Cedro, once 1 subdivision starts it's all over by greed. Or would you call it, environmental manipulation?

But I want to know why these issues have NOT been fully addressed and WHY this project has been swept under the "carpet" as they say without enough knowledge to the public or general population of Palo Cedro. I was never notified. 82-b

How come the issue of impact on wildlife has not been addressed? 82-c

The fact that police and fire are all ready short staffed? 82-d

The extreme fire danger this will bring, should a fire take off in the wind?? Just look at what happened in Napa and Southern Ca. 82-e

The issues of water to small ranchers like me? I already lost my crop during the drought. Just to be able to keep and maintain my household use and animals. During the drought, I had to buy summer water for $1500.00 and I lost what I did not use... I could not afford to buy enough water to keep my crop. 82-f

The traffic survey appears incomplete? why is that? Where is the traffic survey on Swede Creek up to Deschutes. Everything I could find looks incomplete. 82-g

I was told the surveys of these roads are outdated? Is that true?

How come only some residents were sent disc's with all the information and most of us were not? 82-h

Guest house caregiver units?? More people?

The impact on the schools? 82-i

Crime rates will go up, why has that not been addressed? that is easy to prove.

What about all the residents/small ranchers who will be close to this subdivision, the street lights at night, loud music, increased vehicle traffic noise at night, and all the comes with subdivisions? 82-j

Will property taxes increase or will there be additional tax bills to pay for their sewer?

Will homeowners be required to pay the State Fire Tax each year like the rest of us? 82-k

I am profoundly opposed to the Tierra Robles project. It is super negative to the lifestyle of Palo Cedro. I'm willing to move away should this be pushed through out of County Greed and No care of the current lifestyle of small ranching. People who purchase Subdivision property do not care to understand ranching life, then they are the one's who start complaining the loudest. Tractor noise, smoke from burn days, smell from livestock, ect ect ect. There are so many negative impacts. I can only see greed.. Money from property taxes.. Money for the builders. Again look what happened in Brentwood Ca. 82-l

Thank you,

Leah Mecchi

Leah Mecchi

Response to Letter 82 – Leah Mecehi

Response 82-a: The commenter reflects his experience and observations in Brentwood and seeing the area change from a rural to more suburban area. The commenter fears the same thing will happen to the community of Palo Cedro.

Although, no issue of adequacy of the Draft EIR was raised by the commenter, the commenter is referred to ***Master Response-2*** regarding the change of zoning and change to the character of the proposed project site. 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 82-b: The commenter makes a non-specific statement asking why these issues were not addressed and states that he was not notified of the proposed project.

Regarding addressing issues of concern for the commenter, refer to ***Master Response-2***. Regarding noticing, to commenter is referred to ***Master Response-1.*** The County noticed the document's availability in accordance with the State *CEQA Guidelines* and circulated a Notice of Availability (NOA) to surrounding property owners. The commenter is referred to page 1-6 in Section 1.0, INTRODUCTION AND PURPOSE, of the Draft EIR which describes the steps that were taken to comply with these State *CEQA Guidelines* requirements to include the EIR Scoping Process, preparation and review of the Initial Study, Scoping Meetings, preparation and drafting of the EIR, and review of the EIR. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 82-c: The commenter states that impacts to wildlife have not been addressed.

The commenter is referred to Section 5.4, BIOLOGICAL RESOURCES, which described impacts to wildlife as well as preceding ***Responses 3-a*** through ***3-v***. 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 82-d: The commenter writes "the fact police and fire are already short staffed?"

The commenter is referred to preceding ***Response 37-f*** and ***51-b***, as well as Section 5.13, PUBLIC SERVICES AND FISCAL IMPACTS, of the Draft EIR. Impacts to public services, including fire and police services, were found to be *less than significant*. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 82-e: The commenter notes the potential dangers from wildfires but does not question the adequacy of the Draft EIR.

The commenter is referred to Section 5.8, HAZARDS AND HAZARDOUS MATERIALS, of the Draft EIR, and preceding ***Response 37-f*** regarding wildfires. 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 82-f: The commenter makes a statement about being a small rancher asking about water.

The commenter is referred to ***Master Response-3*** and ***Responses 7-a*** through ***7-p*** regarding water supply. 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 82-g: The commenter questions why the traffic report is incomplete, outdated, and asks about the survey from Sweede Creek to Deschutes.

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*** address project-related traffic impacts, safety, and mitigation. The commenter is also 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 82-h: The commenter questions why only some residents were sent disks.

The commenter is referred to ***Master Response-1*** regarding the extended review period. 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 82-i: The commenter questions the use of a guest house care giver units and questions the potential for more people and the impact on schools and crime.

The commenter appears to be questioning the estimate of 15 accessory dwelling units. The commenter is referred to page 5.12-9 in Section 5.12, POPULATION AND HOUSING, which estimates a total of 15 accessory dwelling units that would be occupied by 2 persons, which equates to 30 residents. Impacts were found to be *less than significant.* The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Regarding impacts to schools, the commenter is referred to preceding ***Responses 32-g*** and ***48-k***. Regarding increase crime rates the commenter is referred to Section 5.13, PUBLIC SERVICES AND FISCAL IMPCTS, and preceding ***Response 51-b***. Impacts were found to be *less than significant*. The comment is noted for the record and will be

provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Response 82-j: The commenter questions the impact to nearby residents and ranchers from street lights, loud music, traffic noise, and a non-specific question about other things.

The commenter is referred to Draft EIR Section 5.1, AESTHETICS AND VISUAL RESOURCES, for a discussion of impacts to lighting, and Section 5.11, NOISE, for a discussion of impacts from noise including vehicle noise. 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 82-k: The commenter asks if property taxes will increase to pay for the sewer and if new homeowners will be required to pay State Fire Tax.

The future property owners within the project site will pay taxes, just as other County residents pay taxes. The County uses these taxes to fund various programs to benefit its residents. Therefore, the residents will be paying taxes that in turn will help with all County services including infrastructures and public services. The commenter is referred to preceding ***Response 47-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 82-l: The commenter reiterates opposition to the proposed project and restates reasons listed above.

No issue or adequacy of the Draft EIR was raised by the commenter. The commenter is referred to ***Responses 82-a*** through ***82-k***, immediately above. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is necessary.

Letter 83 – Tom and Rebecca Semb (December 29, 2017)

Kimberly Hunter

From:	Resource Management
Sent:	Friday, December 29, 2017 8:30 AM
To:	Kimberly Hunter
Subject:	FW: Tierra Robles EIR Comments
Attachments:	Tierra Robles EIR Letter.docx

From: Tom Semb [mailto:tomsemb@hotmail.com]
Sent: Thursday, December 28, 2017 8:11 PM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: Tierra Robles EIR Comments

Here are our comments regarding the Tierra Robles Subdivision EIR draft. 83-a

Thank you,

Tom and Becki Semb

1

Tierra Robles Subdivision

To Whom It May Concern:

We have reviewed the Tierra Robles draft EIR and traffic control plan and have the following questions and concerns:

1. Zoning would change to accommodate 1.3 acre parcels which is concerning to us for the following reasons. Shasta Counties zoning map and Google Maps seems to show that for several miles in any direction of the project site the minimum zoning is 2.5 acres sites. It appears that a person would have to drive to the town of Palo Cedro 3.5 miles from the projects access to Boyle Rd before encountering lots this size or smaller. There may be a few exceptions of lots less than 2.5 acres within a 3.5 mile radius of the project that were not easily noticeable on the maps but it does not change the fact that parcels this small are an anomaly and a change of zoning that would allow lots of this size is unprecedented in this area. Current residences have sought out this area and paid a premium for the enjoyments that a less populated area provides. The Tierra Robles subdivision should blend in with the existing zoning of 2.5+ acre lots and the current residences should not be made to suffer losses to their quality of life. The EIR indicates that the majority of the surrounding parcels are vacant. A quick glance on Google Maps show that most lots are developed within a several mile radius of the proposed subdivision and will be adversely impacted by a high density development that does not mesh well with the surrounding land usage. 83-b
2. The traffic report says that 62% of the traffic from the project would go west on Boyle Rd to Redding. This seems like a very low percentage since this is the likely direction people would go to work and shop.
3. The traffic report excludes from is study the section of roadway that would be most highly impacted which is on Boyle Rd west of the project to Old Alturas Rd. This road does not have shoulders and is unfit for pedestrian or bike access. Additional traffic would make matters worse and both pedestrian and bike access should be included as required improvements. 83-c

Thank you for your time,

Sincerely,

Tom and Rebecca Semb

10646 Green Oaks Lane

Redding CA 96003

Response to Letter 83 – Tom and Rebecca Semb

Response 83-a: The commenter noted an attached or subsequent sheet with comments.

These comments are addressed in ***Responses 83-b*** through ***83-d***, immediately below. 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 83-b: The commenter states that the zoning change is concerning because the proposed project conflicts with the size of surrounding lots and such a conversion is unprecedented. The commenter states that the proposed project should blend in with the surrounding areas, that the Draft EIR incorrectly says the majority of surround parcels are vacant, and that surrounding parcels would be adversely impacted.

The commenter is referred to ***Master Response-2*** which discusses zoning, residential densities, and how the proposed project would blend in with the surround areas. The commenter also is referred to Section 5.1, AESTHETICS AND VISUAL RESOURCES, for additional discussion of the visual elements of the proposed project and design elements to reduce visual conflicts. 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 83-c: The commenter questions the reported 62% of traffic travelling west on Boyle Road. The commenter states that the study does not adequately discuss impacts to Boyle Road west of the project to Alturas Road. The commenter notes there are no shoulders, it is unfit for pedestrians and bicycles, and the proposed project would make it worse, and pedestrian and bicycle access should be included to the project.

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*** address project-related traffic impacts, safety, and mitigation. The commenter is also 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 required.

Letter 84 – Leslie Golden (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
Importance:	High

From: Leslie Golden [mailto:leslie@catpublishing.com]
Sent: Friday, December 29, 2017 4:15 PM
To: Resource Management <resourcemanagement@co.shasta.ca.us>
Subject: Tierra Robles DEIR Public Comments
Importance: High

To: Kent Hector, Senior Planner, Shasta County Department of Resource Management, Planning Division

Dear Mr. Hector,
The purpose of this letter is to express my concerns about the Draft Environmental Impact Report prepared for the Proposed Tierra Robles Planned Development Project.

As a resident of Shasta County, specifically living on Northgate Drive in Palo Cedro, CA, I am deeply concerned about the negative impact this proposed project will have on our community. My concerns include, but are not limited to: 84-a

1) Section 5.17 Utilities and Service Systems: I am very concerned about the supply of water available to our area through the Bella Vista Water District (BVWD). Our community has already experienced a shortage of water, due to severe Central Valley Project water allocation cutbacks during previous drought years (2015). An addition of 166 households would put an unreasonable strain on limited water resources that have proven unable to meet the current demand for water. The total water demand for an additional 166 households could cause severe environmental impacts.
2) Section 5.16 Traffic and Circulation: The Draft EIR indicates that Northgate Drive would be designated as a secondary emergency access road to the proposed project. Northgate Drive is a private drive maintained by current residents. The road is not appropriate/adequate for emergency traffic and should be removed from current and future site maps. The developers must determine an alternative secondary emergency access to the proposed project. 84-b
3) Traffic safety is a serious concern. Local surface streets such as Boyle Road currently suffer from overuse and unsafe conditions due to cars traveling at speeds over and above the posted speed limits particularly during high use times when parents/students are traveling to local schools (example: Foothill HS). The Draft EIR should be revised to evaluate the safety of roadway segments that will be impacted by the additional traffic expected during high usage commute times (AM and PM). For example, vehicles turning left out of the Project onto Boyle, should have a left turn access lane to insure cars are safely added into the flow of Boyle through traffic. 84-c
4) Changing local zoning laws to allow smaller parcels would be an overall negative to homeowners that have invested in homes/property and have chosen to live in a rural area. 84-d

Thank you for your consideration.

Sincerely,

1

Leslie Golden
10793 Northgate Drive
Palo Cedro, CA 96073
530-356-7926

2

Response to Letter 84 – Leslie Golden

Response 84-a: The commenter makes an introductory statement expressing concern about the proposed project. The commenter states concern about water supply and says the additional 166 residences would put additional strain on the limited resources causing severe environmental impacts.

The commenter is referred to ***Master Response-3*** regarding the 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 required.

Response 84-b: The commenter states that the use of Northgate Drive is a private drive maintained by current residents and is not appropriate or adequate for emergency access and should be moved to an alternative location.

It should be noted that the since preparation and circulation of the Draft EIR the proposed emergency access at Northgate Drive has been omitted from the proposed project. No further response is necessary.

Response 84-c: The commenter states that traffic safety is a serious concern and local surface streets such as Boyle Road is overused and cars travel over the speed limit. The commenter states that Draft EIR should be revised to evaluate the safety of roadway segments during high use times. The commenter provides an example of left turns from the proposed project to Boyle Road.

Issues raised by the commenter have been previously discussed and addressed in the following responses that precede this comment letter: ***Response 4-b, 5-f, 13-e, 14-b, 17-f, 17-n, 17-o, 17-p, 32-b, 35-c, 37-c, 40-a, 41-a, 43-b, 47-c, 48-i, 48-k, 48-o, 48-p, 48-q, 48-w, 49-b, 50-b, 54-f, 57-l, 65-l, 65-n,*** and ***65-o*** address project-related traffic impacts, safety, and mitigation. The comment is noted for the record and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is necessary and no change to the Draft EIR is required.

Response 84-d: The commenter states that changing zoning laws to allow smaller parcels would be an overall negative to homeowners and rural community.

The commenter misstates that a zoning law would be changed. The proposed project would result in a change of the existing zoning of the proposed project site from Rural Residential 5-acre minimum (RR-BA-5), Rural Residential 3-acre minimum (RR-BA-3), and Unclassified (U), to a Planned Development (PD) zone district. Regarding the changes to rural community, the commenter is referred to ***Master Response-2***. 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.