

REPORT TO SHASTA COUNTY RTPA

SUBJECT		MEETING DATE	ITEM NUMBER
Correspondence		2/22/11	5-4

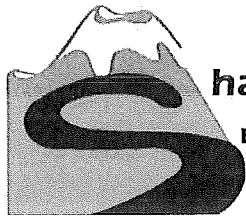
Attached is correspondence determined to be of interest to the board.



Daniel S. Little, AICP, Executive Director

DSL/jac

Attachments: Letter from Shasta County RTPA to Shasta County Planning Division
Letters from the North State Super Region
Letter from Shasta County RTPA to US Bureau of Reclamation
Letters from Shasta County RTPA to Senator LaMalfa and Assemblyman Nielsen



Shasta County

**Regional Transportation
Planning Agency**

1855 Placer Street • Redding, CA 96001 • (530)225-5654 • FAX (530)225-5667
E-Mail scrtpa@co.shasta.ca.us • HOME PAGE www.scrtpa.org

Daniel S. Little, Executive Director

January 11, 2011

RMS 010024

Lisa Lozier
Shasta County Planning Division
1855 Placer Street
Redding, CA 96001

Subject: Re-circulated Draft Environmental Impact Report (SCH# 2009012088)

Dear Ms. Lozier:

Thank you requesting Shasta County Regional Transportation Planning Agency (SCRTPA) comments on the Knighton & Churn Creek Commons Retail Center Draft Environmental Impact Report (DEIR) and the re-circulated traffic section. This letter supersedes our comments on the prior draft. The SCRTPA is statutorily responsible for inter-jurisdictional coordination, funding and planning of regional transportation needs.

The re-circulated traffic section has additional analysis. It concludes that 76% of project traffic will rely on Interstate 5 and identifies 40 significant project impacts to regional transportation facilities. The DEIR identifies mitigation for each impact. It appears that for 39 of the 40 impacts, the stated mitigation will not occur. This should be disclosed in a more straightforward fashion. The stated reason to not participate in mitigation is that "a guaranteed funding source for the identified improvements has not been identified, or secured."

As the region's transportation funding agency, we disagree there is not a "guaranteed funding source" "identified or secured" for mitigation improvements, particularly with respect to Interstate 5 (I-5) mainline. In fact, certain mitigation improvements identified in the DEIR will be constructed this year with \$23 million in secure, dedicated funding sources. Similar transportation projects will follow. Mitigation from major projects such as this is a recognized part of the solution, consistent with our transportation funding plans. The Vineyards project in Anderson is a recent example of an EIR approval that included I-5 mainline funding, and funding on county facilities.

Most of the transportation needs identified as mitigation in the DEIR are included in the attached list of plans and programs. All are viable due to secured funding sources and statutory financing authority available to the region, and the state. Dedicated gas taxes and bond revenues are two examples. Based on existing plans and programs backed by dedicated revenue streams, the needed mitigation projects identified in the DEIR will be built eventually. If, however, all projects with substantial regional traffic impacts are freed of the requirement to mitigate, the region's planned and programmed project needs will be significantly delayed for several years, if not decades.

Although many of the DEIR mitigations meet the test of having "guaranteed" and secure fund sources, this is nonetheless an unreasonable prerequisite to developer participation in traffic mitigation. For projects such as this that amend general plans to add substantial traffic, neighboring jurisdictions and

Caltrans cannot be expected to predict the change, let alone identify up-front, guaranteed and secured funding sources to mitigate all resulting impacts.

The DEIR states that the lead agency cannot guarantee construction of needed mitigation to facilities located "wholly or partly outside the jurisdiction of the lead agency." While this lack of direct control can be a basis to find an impact potentially significant and unavoidable, it is not a valid basis to avoid all responsibility to participate with Anderson, Redding, and Caltrans in efforts to mitigate. The DEIR provides current examples of where multijurisdictional mitigation is feasible: Shasta County currently collects fees to mitigate new development's impacts on Anderson, Redding and Caltrans facilities.

Feasibility determinations for extra-jurisdictional impacts should also be evaluated in the context of whether the mitigation is identified in local, regional, and state transportation plans and/or improvement programs. To assist you, we have attached a list of relevant plans and programs for which the SCRTPA is responsible. There are also several traffic improvement plans and programs prepared by the cities and Caltrans. This includes the "Caltrans I-5 Improvement Plan, Shasta County" which identifies I-5 improvement needs and funding sources. Our cursory analysis shows that most of the project mitigation determined not feasible is identified within one or more of these plans and funding programs.

The DEIR shows "existing plus project conditions" would degrade the Knighton Road/I-5 and Cypress/I-5 interchanges to an unacceptable level of service. Mitigation was determined to be infeasible for the reasons discussed above. Existing plus project conditions, by definition, are direct impacts. Direct impacts should be mitigated by the project proponent. The DEIR logic used to dismiss mitigation of cumulative impacts is even more tenuous when applied to dismiss mitigation for direct impacts.

The DEIR applies Caltrans thresholds of significance standards to I-5 mainline. Consistent with this, the DEIR needs to apply the same standards to all interchanges since they are also owned and operated by Caltrans. The Caltrans level-of-service threshold is LOS D, not LOS E, unless otherwise negotiated.

The original DEIR included the project percentage fair share contribution to mitigate impacts. The re-circulated DEIR, for many impacts, instead refers to payment of "fair share" fees through existing fee programs. The DEIR needs to demonstrate how payment of these fees equate to a fair share under CEQA. This can be done with an estimate of the fees paid toward said improvements compared to the actual fair share cost of those same improvements as identified through the DEIR traffic analysis.

The DEIR states that cumulative 2030 traffic conditions are based on the SCRTPA Travel Demand Model. It states that changes were made to the SCRTPA model; however, the lead agency has refused to allow reviewing agencies to view these changed inputs. This is inconsistent with the SCRTPA's current model user agreements. The information should be disclosed and meaningful opportunity provided for public comment.

Thank you again for the invitation to comment.

Sincerely Yours,

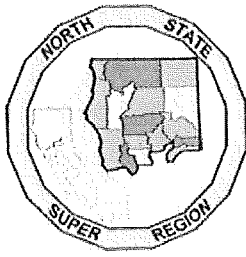


Dick Dickerson, Chairman
Shasta County RTPA

Attachment

Shasta County Regional Transportation Plans and Capital Improvement Programs:

1. Interstate 5 Transportation Concept Report
<http://www.dot.ca.gov/dist2/planning/conceptrpts.htm>
2. Shasta County 2010 Regional Transportation Improvement Program
www.scrtpa.org/RTtips.html
3. 2010 Federal Transportation Improvement Program
www.scrtpa.org/RTtips.html
4. 2010 State Transportation Improvement Program
www.catc.ca.gov/programs/STIP/2010_Orange_Book.pdf
5. California Corridor Mobility Improvement Account Program
<http://www.catc.ca.gov/programs/cmia.htm>
6. Shasta County Interchange Improvement Study, Final Report (available at RTPA office)



North State Super Region

1855 Placer Street, Redding, CA 96001
(530) 225-5654 nssr16@gmail.com

www.superregion.org

Dan Little, Chair

Jon Clark, Vice Chair

Jon Clark

Butte County Assn. of Governments

James Bell

Colusa County Transportation Comm.

Tamera Leighton

Del Norte Local Transportation Comm.

John Linhart

Glenn County Transportation Comm.

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Gary Antone

Tehama County Transportation Comm.

Richard Tippet

Trinity County Transportation Comm.

Marty Byrne

Plumas County Transportation Comm.

1/27/2011

Ms. Bimla Rhinehart

Executive Director

California Transportation Commission

1120 N Street, Room 2233 (MS-52)

Sacramento, CA 95814

Dear Ms. Rhinehart:

Bimla

A partnership of RTPA/MPO executive directors has been established to address transportation, growth and land use issues in the north state. The North State Super Region consists of all 16 counties north of SACOG and the MTC. This region contains 37% of California's state and federal roads, and over a quarter of California's land area. Membership in this alliance was approved unanimously by all 16 governing boards and commissions. A memorandum of agreement was signed on October 20, 2010. Our website is www.superregion.org.

We hope to be the main point of contact for the CTC to gather information and build consensus in the north state. The coordination of federal mandates and preparation of state and federal documents can be expedited if coming from a central organization. In addition, this partnership lends itself to building mutually beneficial and creative funding scenarios for grants and transportation improvements.

We will arrange a delegate team to meet with you personally to discuss how we can work together toward our common goals, as well as familiarize you with our efforts.

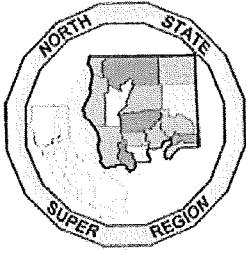
We also have a North State Super Region meeting scheduled at 10 a.m. on February 16, 2011, in Redding. We would be pleased to include you on our agenda if you can attend.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dan Little".

Daniel S. Little, AICP

Chair, North State Super Region



North State Super Region

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(530) 225-5654 nssr16@gmail.com

www.superregion.org

Dan Little, Chair

Jon Clark, Vice Chair

1/27/2011

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Trinity County Transportation Comm.

Marty Byrne

Plumas County Transportation Comm.

Mr. Butch Waidelich

Division Administrator

Federal Highway Administration

650 Capitol Mall, Suite 4-100

Sacramento, CA 95814

Dear Mr. Waidelich:

A handwritten signature in dark ink that reads "Butch".

A partnership of RTPA/MPO executive directors has been established to address transportation, growth and land use issues in the north state. The North State Super Region consists of all 16 counties north of SACOG and the MTC. This region contains 37% of California's state and federal roads, and over a quarter of California's land area. Membership in this alliance was approved unanimously by all 16 governing boards and commissions. A memorandum of agreement was signed on October 20, 2010. Our website is www.superregion.org.

We hope to be a valuable contact for Federal Highways in gathering information and responding to current issues in the North State. A primary area of focus will be interregional travel and goods movement on the federal system. This partnership will also be supportive in coordinating projects to maximize the use of federal dollars in our region.

We will arrange a delegate team to meet with you personally to discuss how we can work together toward our common goals, as well as familiarize you with our efforts.

We also have a North State Super Region meeting scheduled at 10 a.m. on February 16, 2011, in Redding. We would be pleased to include you on our agenda if you can attend.

Sincerely,

A handwritten signature in dark ink that appears to read "Dan Little".

Daniel S. Little, AICP

Chair, North State Super Region

The attached letter regarding the North State Super Region was mailed on January 28, 2011, to the following:

SENATOR DOUG LAMALFA
CALIFORNIA STATE SENATE
STATE CAPITOL ROOM 3070
SACRAMENTO CA 95814

ASSEMBLYMAN WES CHESBRO
CALIFORNIA STATE ASSEMBLY
PO BOX 942849
SACRAMENTO CA 94249-0001

ASSEMBLYMAN JIM NIELSEN
CALIFORNIA STATE ASSEMBLY
280 HEMSTED DRIVE SUITE 110
REDDING CA 96002

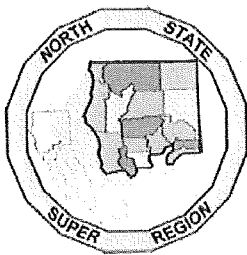
ASSEMBLYMAN DAN LOGUE
CALIFORNIA STATE ASSEMBLY
1550 HUMBOLDT ROAD SUITE 4
CHICO CA 95928

CONGRESSMAN WALLY HERGER
US HOUSE OF REPRESENTATIVES
410 HEMSTED DRIVE SUITE 115
REDDING CA 96002

CONGRESSMAN MIKE THOMPSON
US HOUSE OF REPRESENTATIVES
231 CANNON OFFICE BUILDING
WASHINGTON DC 20515

CONGRESSMAN TOM MCCLINTOCK
US HOUSE OF REPRESENTATIVES
428 CANNON HOB
WASHINGTON DC 20515

SENATOR NOREEN EVANS
STATE CAPITOL ROOM 4034
SACRAMENTO CA 95814



North State Super Region

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Dan Little, Chair

Jon Clark, Vice Chair

1/27/2011

Jon Clark

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James Bell

Colusa County Transportation Comm.

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Richard Tippet

Trinity County Transportation Comm.

Marty Byrne

Plumas County Transportation Comm.

The Honorable Doug LaMalfa
California State Senate
State Capitol, Room 3070
Sacramento, CA 95814

Dear Senator LaMalfa:

A partnership of regional transportation planning agencies in the north state has been established to address common issues. The North State Super Region consists of all 16 California counties north of Sacramento and the Bay Area. Membership in this alliance was approved unanimously by all 16 governing boards. Our website is www.superregion.org.

While we may not have the clout of our big-city neighbors to the south, what we do have is the ability to build consensus among a vast geographic region. The North State Super Region comprises one-quarter of California's land area and one-third of our state and federal roads.

The North State Super Region includes all areas within your legislative district: Butte, Colusa, Del Norte, Glenn, Nevada, Shasta, Siskiyou, Tehama and Trinity. Our governing boards consist of locally elected officials representing all cities and counties. A unified position among your constituency can make your job easier at the capitol.

We plan to arrange a delegate team and meet with you to discuss how we can work together, as well as familiarize you with our efforts.

We also have a North State Super Region meeting scheduled at 10 a.m. on February 16, 2011, in Redding. We would be pleased to include you or a representative on our agenda if you can attend.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dan Little", written over a horizontal line.

Daniel S. Little, AICP
Chair, North State Super Region

The attached letter regarding the North State Super Region was mailed on January 28, 2011, to the following:

JOHN COOPER DISTRICT MANAGER
ASSOC GENERAL CONTRACTORS
3095 BEACON BOULEVARD
WEST SACRAMENTO CA 95691

LESLIE T ROGERS
REGIONAL ADMINISTRATOR
FED TRANSIT ADMINISTRATION
201 MISSION STREET SUITE 1650
SAN FRANCISCO CA 94105-1839

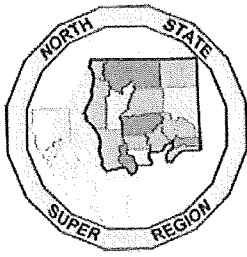
HEATHER FARGO
STRATEGIC GROWTH COUNCIL
NATURAL RESOURCES AGENCY
1416 NINTH STREET SUITE 1311
SACRAMENTO CA 95814

CINDY MCKIM DIRECTOR
CALIFORNIA DEPT OF TRANS
PO BOX 942873
SACRAMENTO CA 94273-0001

GOVERNOR JERRY BROWN
STATE CAPITOL SUITE 1173
SACRAMENTO CA 95814

SENATOR DIANNE FEINSTEIN
UNITED STATES SENATE
331 HART SENATE OFFICE BLDG
WASHINGTON DC 20510

SENATOR BARBARA BOXER
UNITED STATES SENATE
112 HART SENATE OFFICE BLDG
WASHINGTON DC 20510



North State Super Region

1855 Placer Street, Redding, CA 96001

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Dan Little, Chair

Jon Clark, Vice Chair

Jon Clark

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Tehama County Transportation Comm.

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Trinity County Transportation Comm.

Marty Byrne

Plumas County Transportation Comm.

1/27/2011

Leslie T. Rogers

Regional Administrator

Federal Transit Administration

201 Mission Street, Suite 1650

San Francisco, CA 94105-1839

Dear Mr. Rogers:

A partnership of regional transportation planning agencies in the north state has been established to address common issues. The North State Super Region consists of all 16 California counties north of Sacramento and the Bay Area. Membership in this alliance was approved unanimously by all 16 governing boards. Our website is www.superregion.org.

While we may not have the clout of our big-city neighbors to the south, what we do have is the ability to build consensus among a vast geographic region. The North State Super Region comprises one-quarter of California's land area and one-third of our state and federal roads.

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Daniel S. Little, AICP

Chair, North State Super Region



Shasta County

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Daniel S. Little, Executive Director

February 7, 2011

RMS 010024

US Bureau of Reclamation
Acquisition Operations Group
Attn: Michelle Maher, Mail Code: 84-27810
Denver Federal Center, Bldg. 67 Rm. 152
6th Avenue and Kipling Street
Denver, CO 80225

Subject: For Shasta Community Services District WaterSMART Grant Application

Dear Ms. Maher:

The Shasta County Regional Transportation Planning Agency (RTPA) is pleased to submit this letter of support on behalf of the Shasta Community Services District (SCSD) WaterSMART Program grant application. Development of a GIS-based water management system will be used to create a more effective and efficient water delivery system and allow the RTPA to better integrate water management into the region's overall sustainability program.

The RTPA's regional GIS platform will be utilized to combine water resources data with various other geo-spatial data, to better analyze growth and inform decision-making. With up-to-date water resources data in a format consistent with existing standards and technologies, we can more adequately evaluate water resource needs within the context of our state-mandated Sustainable Community Strategy.

If WaterSMART Program funds are awarded to the SCSD, the Shasta County RTPA will facilitate the uploading of water resource data to the regional GIS platform.

The Shasta County RTPA strongly encourages the award of WaterSMART Program funds for the SCSD's proposal.

Sincerely,

Daniel S. Little, AICP, Executive Director
Shasta County Regional Transportation
Planning Agency (MPO)

DSL/SMT/jac



Shasta County

**Regional Transportation
Planning Agency**

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Daniel S. Little, Executive Director

February 8, 2011

RMS 010024

The Honorable Doug LaMalfa
California State Senate
State Capitol, Room 3070
Sacramento, CA 95814

Subject: Comprehensive Solution for the Transportation Gas Tax Swap

Dear Senator LaMalfa:

The Shasta County Regional Transportation Planning Agency (RTPA) implores the Legislature to prevent the loss of \$2.5 billion annually in traditional gas tax revenue dedicated to critical transportation projects statewide.

The "Gas Tax Swap" replaced the sales tax on gasoline with an equivalent gasoline excise tax. It was approved by the Legislature last year with overwhelming support because it managed to protect existing transportation revenue while providing limited general fund relief.

Propositions 22 and 26, passed in November, compromise this agreement. Proposition 22 prohibits the use of gas tax revenue to pay transportation bond debt service. Proposition 26 will undo the "Gas Tax Swap" unless reinstated by a two-thirds vote of the Legislature by November 2011. Still more alarming, Proposition 26 may have the unintended consequence of eliminating these historic revenues altogether.

Shasta County and its cities stand to lose over \$6 million annually in direct gas tax subventions. These funds are relied upon to maintain our roads, replace our bridges and provide vital match to leverage federal funds. Local agencies in Shasta County would forego an additional \$121 million in federal funds over the next twenty years without this source of state matching funds.

Loss of these revenues would also effectively eliminate the State Transportation Improvement Program (STIP) and the Shasta County RTPA would lose over \$5 million in gas tax revenue annually. STIP funds are invested in our ongoing efforts to complete a six-lane facility on Interstate 5 which serves as an economic driver within our urban core.

The Shasta County Regional Transportation Planning Agency, representing Shasta County, Redding, Anderson and the City of Shasta Lake, urges your support of the Governor's proposal to revalidate the current gasoline excise tax. Without this traditional funding stream, maintenance, safety and capacity needs will be neglected. The elimination of transportation contracts would be a devastating blow to an already hard-hit construction industry.

Sincerely Yours,

Dick Dickerson, Chairman
Shasta County RTPA



Shasta County

**Regional Transportation
Planning Agency**

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Daniel S. Little, Executive Director

February 8, 2011

RMS 010024

The Honorable Jim Nielsen
California State Assembly
280 Hemsted Drive, Suite 110
Redding, CA 96002

Subject: Comprehensive Solution for the Transportation Gas Tax Swap

Dear Assemblyman Nielsen:

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Sincerely Yours,

Dick Dickerson, Chairman
Shasta County RTPA