

REPORT TO SHASTA COUNTY RTPA

SUBJECT	MEETING DATE	ITEM NUMBER
Comment Letter for Knighton & Churn Creek Commons Retail Center	12/8/09	7

RECOMMENDATION

It is recommended that the Board authorize the Chair to sign the attached comment letter on the Draft Environmental Impact Report (DEIR) for the "Knighton & Churn Creek Commons Retail Center."

SUMMARY

Pursuant to RTPA Policy 5-5 (attached), a DEIR comment letter has been drafted for approval by the Board.

DISCUSSION

RTPA Policy 5-5, approved by the Board last April, provides guidance to the Executive Director when commenting on regionally significant projects and grants. The RTPA has been invited to comment on the DEIR for the Knighton & Churn Creek Commons Retail Center in Shasta County.

Policy 5-5 states, "Politically sensitive items, as determined by the Executive Director, shall be brought to the full Board." The attached comment letter is provided for Board consideration. An excerpt from the DEIR showing transportation impacts is attached. The full EIR is available on the Internet at www.co.shasta.ca.us/Departments/Resourcegmt/drm/Knighton/DEIR/index.htm.

ALTERNATIVES

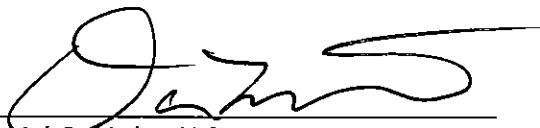
The Board may determine that it is appropriate for the Executive Director to send DIER responses without Board approval. The Board may decline to provide comments, in which case Policy 5-5 should be amended accordingly. The Board may suggest specific changes to the attached letter.

OTHER AGENCY INVOLVEMENT

The Technical Advisory Committee (TAC) reviewed this item and expressed concern with the DEIR findings that mitigation for identified significant impacts to city and Caltrans transportation facilities are not feasible. The TAC also commented that reference to the RTPA's Fix Five effort as an "established" program and basis for mitigation was misleading and inappropriate. TAC comments have been incorporated into the draft comment letter attached.

FINANCING

The attached letter provides information regarding RTPA planning, programming, and financing on the regional transportation network. There are no direct fiscal effects associated with this action.



Daniel S. Little, AICP, Executive Director

DSL/jac

Attachments: RTPA DEIR Comment Letter
Adopted RTPA Policy 5-5
DEIR Summary of Impacts and Mitigation Measures



Shasta County

Regional Transportation
Planning Agency

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Daniel S. Little, Executive Director

December 8, 2009

RMS 010024

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

Subject: Knighton & Churn Creek Commons Retail Center Draft Environmental
Impact Report

Dear Ms. Lozier:

Thank you for asking the Shasta County Regional Transportation Planning Agency (SCRTPA) to comment on the Knighton & Churn Creek Commons Retail Center Draft Environmental Impact Report (DEIR: SCH#2009012088). The SCRTPA is statutorily responsible for inter-jurisdictional coordination, funding, and planning of regional transportation needs.

Page 3.12-3 of the DEIR lists several segments of mainline Interstate 5 to be evaluated; however, the report only evaluates freeway ramp merge and diverge impacts. We can find no analysis of level-of-service on these mainline segments. Since 76% of project traffic will rely on mainline I-5, impacts and mitigation should be disclosed.

The DEIR identifies 33 significant project impacts to regional transportation facilities. The DEIR identifies mitigation for each impact, but concludes that no mitigation is required since full or partial mitigation is not feasible. The DEIR concludes that all 33 transportation impacts are "significant and unavoidable." The stated reasons for not mitigating transportation impacts are:

1. Traffic improvements to mitigate the project impacts are "wholly or partly outside the jurisdiction of the lead agency," meaning all impacted facilities within Anderson, Redding, and Caltrans responsibility will not be mitigated in any way.
2. "A guaranteed funding source for the identified improvements has not been secured," which indicates the project will only participate in improvements that are already funded.

With respect to the first point, feasibility determinations for extra-jurisdictional impacts should 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 local traffic improvement plans and programs available from the cities and Caltrans. Our cursory analysis shows that most of the project mitigation determined not feasible is identified within one or more of these plans and programs.

With respect to the second point, there are no guarantees when it comes to funding and programming transportation projects. 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 local agencies, the region, and the state. Dedicated gas taxes and local traffic impact fees 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 delayed for several years, if not decades.

Throughout the transportation section of the DEIR, mitigation measures state, "Payment of fees defined in the Shasta County Regional Transportation Improvement Program (SCRIP) Impact Nexus Fee Study would cover the project's fair share." The DEIR also incorrectly states the SCRIP is an "established" program. This language is confusing to the public and should be clarified. The SCRIP was never adopted by the RTPA and was rejected by the local agencies. As such, the SCRIP is an invalid reference and an invalid basis for mitigation, or lack thereof. The current disposition of the SCRIP is summarized in a final report (www.fixfive.org) which states, in part, that:

"In the absence of a regional solution to Interstate 5 mainline impacts, mitigation will continue to be negotiated project-by-project and jurisdiction-by-jurisdiction. This will be the case for both private development projects and for Caltrans approvals of requests to increase interchange capacity."

Table 3.12-9 and 3.12-10 of 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 appears more tenuous when applied to dismiss mitigation for direct impacts.

Please contact Executive Director, Dan Little, if you have questions or need additional information. Thank you again for the invitation to comment.

Sincerely Yours,

Dick Dickerson, Chair
Shasta County Regional Transportation
Planning Agency (MPO)

DD/jac

Attachment

C: Pat Minturn, Director, Shasta County Department of Public Works
Brian Crane, Director, City of Redding Transportation and Engineering Department
Jeff Kiser, Director, City of Anderson Department of Public Works
Tim Huckabay, Deputy District Director, Caltrans District 2

Shasta County Regional Transportation Plans and Capital Improvement Programs:

1. Interstate 5 Transportation Concept Report
www.dot.ca.gov/dist2/planning/concept_repts.htm
2. Shasta County 2004 Regional Transportation Plan
www.scrtpa.org/RTlocalplanning.html
3. Shasta County 2008 Regional Transportation Improvement Program
www.scrtpa.org/RTtips.html
4. Shasta County 2010 Regional Transportation Improvement Program
www.scrtpa.org/RTtips.html
5. 2008 Federal Transportation Improvement Program
www.scrtpa.org/RTtips.html
6. 2008 State Transportation Improvement Program
www.catc.ca.gov/programs/STIP/2008_Orange_Book.pdf
7. Shasta County Interchange Improvement Study, Final Report (available at RTPA office)

draft

SHASTA COUNTY RTPA POLICY AND PROCEDURE MANUAL		Number
		5-5
SECTION: Rules of the Shasta County RTPA	Policy for Commenting on Regionally Significant Projects	
APPROVAL DATE: 4/28/09		

POLICY FOR COMMENTING ON REGIONALLY SIGNIFICANT PROJECTS

The RTPA is responsible for regional transportation policy and funding, including new land use responsibility under Senate Bill 375. As approved by the RTPA Board on April 28, 2009, it is the policy of the RTPA to comment on the following types of projects, at the discretion of the Executive Director:

- Transportation projects
- In support of grants related to transportation
- To provide technical information
- Planning documents within Shasta County
- Regionally significant projects within Shasta County
- Regionally significant projects and plans located outside of Shasta County that impact our region

The RTPA shall comment on other projects as directed by the full Board.

Politically sensitive items, as determined by the Executive Director, shall be brought to the full Board.

Copies of comment letters signed by staff will be provided to the Board as part of the "Correspondence" agenda item at the next RTPA meeting.

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.12 Traffic and Circulation					
3.12-1	Impacts to roadway segments under Existing Plus Project conditions	Significant	3.12-1a	Widen Knighton Road to a four-lane arterial between the I-5 southbound ramps and I-5 northbound ramps. This improvement will result in LOS A operations during both the Weekday PM peak hour and Saturday mid-day peak hour.	Significant and Unavoidable
		Significant	3.12-1b	Widen Knighton Road to a six-lane arterial between the I-5 northbound ramps and Churn Creek Road. This improvement will result in LOS A operations during both the weekday PM peak hour and Saturday mid-day peak hour.	Significant and Unavoidable
3.12-2	Impacts to intersections under Existing Plus Project conditions	Significant	3.12-2a	Churn Creek Road/Rancho Road: Install a traffic signal to the intersection. This improvement will result in LOS B operations during the weekday PM peak hour at the intersection and LOS B conditions during the Saturday mid-day peak hour at the intersection.	Significant and Unavoidable
		Significant	3.12-2b	Knighton Road/I-5 Southbound Ramps: Install a traffic signal and add the following lanes to the intersection. Southbound Approach – A left-turn lane and right-turn lane for a total of two left and one right-turn lane Westbound Approach – A left-turn lane and a through lane This improvement will result in LOS C operations during the weekday PM peak hour and LOS C conditions during the Saturday mid-day peak hour at the intersection.	Significant and Unavoidable

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
		Significant	3.12-2c	Knighton Road/I-5 Northbound Ramps: Install a traffic signal and add the following lanes to the intersection. Northbound Approach – A right-turn lane Eastbound Approach – Two through lanes and one left-turn lane Westbound Approach – Two through lanes and a right-turn lane This improvement will result in LOS B operations during the weekday PM peak hour and LOS B conditions during the Saturday mid-day peak hour at the intersection.	Significant and Unavoidable
		Significant	3.12-2d	Knighton Road/Project Access: Coordinate traffic signals along Knighton Road adjacent to the project site. This improvement will result in LOS C operations during the Saturday mid-day peak hour at the intersection.	Significant and Unavoidable
		Significant	3.12-2e	Riverside Avenue/I-5 Southbound Ramps: Install a traffic signal to the intersection. This improvement will result in LOS B operations during the weekday PM peak hour at the intersection and LOS B conditions during the Saturday mid-day peak hour at the intersection.	Significant and Unavoidable
3.12-3	Impacts to the I-5 merge/diverge ramp under Existing Plus Project conditions.	Significant	3.12-3	Cypress Avenue/I-5 Northbound On-Ramp Merge: Add a third northbound travel lane to I-5. This improvement will result in LOS C operations during the weekday PM peak hour and LOS D operations during the Saturday mid-day peak hour at the merge to I-5 to from the northbound Cypress Avenue on-ramp.	Significant and Unavoidable

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.12-4	Roadway Segments	Significant	3.12-4a	Widen Knighton Road to a four-lane arterial between the I-5 southbound ramps and I-5 northbound ramps. This improvement will result in LOS A operations during both the weekday PM peak hour and Saturday mid-day peak hour. Payment of fees defined in the Public Facilities Impact Fee program adopted by Shasta County would cover the project's "fair share" Of this cumulative impact.	Significant and Unavoidable
		Significant	3.12-4b	Widen Knighton Road to a six-lane arterial between the I-5 northbound ramps and Churn Creek Road. This improvement will result in LOS A operations during both the weekday PM peak hour and Saturday mid-day peak hour. Payment of fees defined in the Major Road Impact Fees for the South Central Regional Area, would cover the project's "fair share" of this cumulative impact.	Significant and Unavoidable
3.12-5	Intersections	Significant	3.12-5a	Cypress Avenue/I-5 Southbound Ramps: Add a left-turn lane to the southbound intersection approach to make two left-turn and two right-turn lanes. This improvement will result in LOS E operations during the weekday PM peak hour and LOS B operations during the Saturday mid-day peak hour at the intersection. The project's "fair share" of the improvement is 12%.	Significant and Unavoidable
		Significant	3.12-5b	Cypress Avenue/I-5 Northbound Ramps: Add a left-turn lane to the northbound intersection approach for a total of two left-turn and two right-turn lanes. This improvement will result in LOS E operations during the weekday PM peak hour and LOS F operations during the Saturday mid-day peak hour at the intersection. The project's "fair share" of the improvement is 12%.	Significant and Unavoidable

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
		Significant	3.12-5c	Bonnyview Road/I-5 Southbound Ramps: Add a southbound shared left/right-turn lane. This improvement will result in LOS C operations during the weekday PM peak hour and LOS C operations during the Saturday mid-day peak hour at the intersection. The project's "fair share" of the improvement is 21%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable
		Significant	3.12-5d	Bonnyview Road/I-5 Northbound Ramps: Add an additional northbound left-turn lane for a total of two left-turn and one right-turn lane. This improvement will result in LOS E operations during the weekday PM peak hour and LOS D operations during the Saturday mid-day peak hour at the intersection. The project's "fair share" of the improvement is 16%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable
		Significant	3.12-5e	Churn Creek Road/Rancho Road: Install a traffic signal to the intersection. This improvement will result in LOS C operations during the weekday PM peak hour and LOS B operations during the Saturday mid-day peak hour at the intersection. The project's "fair share" of the improvement is 18%.	Significant and Unavoidable
		Significant	3.12-5f	Knighton Road/I-5 Southbound Ramps: Install a traffic signal and add the following lanes to the intersection. Southbound Approach – Two left-turn lane and a right-turn lane Westbound Approach – Two left-turn lanes and a	Significant and Unavoidable

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
				through lane This improvement will result in LOS C operations during the weekday PM peak hour and LOS C operations during the Saturday mid-day peak hour at the intersection. The project's "fair share" of the improvement is 83%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	
		Significant	3.12-5g	Knighton Road/I-5 Northbound Ramps: Install a traffic signal and add the following lanes to the intersection. Northbound Approach – A left-turn lane for a left and right-turn lane configuration Eastbound Approach – Two through lanes and one left-turn lane Westbound Approach – Two through lanes and a free right-turn lane This improvement will result in LOS C operations during the weekday PM peak hour and LOS C operations during the Saturday mid-day peak hour at the intersection. The project's "fair share" of the improvement is 79%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable
		Significant	3.12-5h	Riverside Avenue/I-5 Southbound Ramps: Install a traffic signal to the intersection. This improvement will result in LOS B operations during the weekday PM peak hour and LOS C operations during the Saturday mid-day peak hour	Significant and Unavoidable

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
				at the intersection. The project's "fair share" of the improvement is 22%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	
		Less Than Significant	3.12-5i	Riverside Avenue/I-5 Northbound Ramps: Install a traffic signal to the intersection. This improvement will result in LOS B operations during the weekday PM peak hour and LOS C operations during the Saturday mid-day peak hour at the intersection. The project's "fair share" of the improvement is 13%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Less Than Significant
		Significant	3.12-5j	Knighton Road/Churn Creek Road/ Pacheco Road: Configure the intersection as listed below. Southbound Approach – Left-turn lane, through lane, and a channelized right-turn lane Westbound Approach – Two through lanes, channelized right-turn lane, and a left-turn lane Northbound Approach – Left-turn lane and a through/right-turn lane Eastbound Approach – Two Left-turn lanes, one through lane, and a right turn lane This improvement will result in LOS C operations during the weekday PM peak hour and LOS C operations during the Saturday mid-day peak hour at the intersection. The project's "fair share" of the improvement is 47%.	Significant and Unavoidable

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.12-6	Freeway Ramp Merge/Diverge	Significant	3.12-6a	Riverside Avenue/I-5 Southbound Off-Ramp Diverge: Add a third southbound travel lane to I-5. This improvement will result in LOS D operations during the weekday PM peak hour at the diverge from I-5 to the southbound off-ramp to Riverside Avenue. The project's "fair share" of the improvement is 50%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable
		Significant	3.12-6b	Riverside Avenue/I-5 Southbound On-Ramp Merge: Add a third southbound travel lane to I-5. This improvement will result in LOS D operations during the weekday PM peak hour and LOS B operations during the Saturday mid-day peak hour at the merge to I-5 to from the southbound Riverside Avenue on-ramp. The project's "fair share" of the improvement is 32%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable
		Significant	3.12-6c	Riverside Avenue/I-5 Northbound Off-Ramp Diverge: Add a third northbound travel lane to I-5. This improvement will result in LOS D operations during both the weekday PM peak hour and Saturday mid-day peak hour at the diverge from I-5 to the northbound off-ramp to Riverside Avenue. The project's "fair share" of the improvement is 42%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
		Significant	3.12-6d	Riverside Avenue/I-5 Northbound On-Ramp Merge: Add a third northbound travel lane to I-5. This improvement will result in LOS D operations during the weekday PM peak hour and LOS E operations during the Saturday mid-day peak hour at the merge to I-5 to from the northbound Riverside Avenue on-ramp. The project's "fair share" of the improvement is 60%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable
		Significant	3.12-6e	Knighton Road/I-5 Southbound Off-Ramp Diverge: Add a third southbound travel lane to I-5. This improvement will result in LOS D operations during the weekday PM peak hour and LOS C operations during the Saturday mid-day peak hour at the diverge from I-5 to the southbound off-ramp to Knighton Road. The project's "fair share" of the improvement is 98%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable
		Significant	3.12-6f	Knighton Road/I-5 Southbound On-Ramp Merge: Add a third southbound travel lane to I-5. This improvement will result in LOS D operations during the weekday PM peak hour at the merge to I-5 from the southbound Knighton Road on-ramp. The project's "fair share" of the improvement is 72%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
		Significant	3.12-6g	Bonnyview Road/I-5 Northbound Off-Ramp Diverge: Add a third northbound travel lane to I-5. This improvement will result in LOS C operations during the Saturday mid-day peak hour at the diverge from I-5 to the northbound off-ramp to Bonnyview Road. The project's "fair share" of the improvement is 42%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable
		Significant	3.12-6h	Bonnyview Road/I-5 Southbound Off-Ramp Diverge: Add a third southbound travel lane to I-5. This improvement will result in LOS E operations during the weekday PM peak hour and LOS D operations during the Saturday mid-day peak hour at the diverge from I-5 to the southbound off-ramp to Bonnyview Road. The project's "fair share" of the improvement is 45%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable
		Significant	3.12-6i	Bonnyview Road/I-5 Southbound On-Ramp Merge: Add a third southbound travel lane to I-5. This improvement will result in LOS E operations during the weekday PM peak hour and LOS C operations during the Saturday mid-day peak hour at the merge to I-5 to from the southbound Bonnyview Road on-ramp. The project's "fair share" of the improvement is 34%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
		Significant	3.12-6j	Cypress Avenue/I-5 Northbound Off-Ramp Diverge: Add a third northbound travel lane to I-5. This improvement will result in LOS D operations during the weekday PM peak hour and LOS E operations during the Saturday mid-day peak hour at the diverge from I-5 to the northbound off-ramp to Cypress Avenue. The project's "fair share" of the improvement is 21%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable
		Significant	3.12-6k	Cypress Avenue/I-5 Northbound On-Ramp Merge: Add a third northbound travel lane to I-5. This improvement will result in LOS E operations during the weekday PM peak hour and LOS F operations during the Saturday mid-day peak hour at the merge to I-5 to from the northbound Cypress Avenue on-ramp. The project's "fair share" of the improvement is 40%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable
		Significant	3.12-6l	Cypress Avenue/I-5 Southbound Off-Ramp Diverge: Add a third southbound travel lane to I-5. This improvement will result in LOS E operations during the weekday PM peak hour and LOS D operations during the Saturday mid-day peak hour at the diverge from I-5 to the southbound off-ramp to Cypress Avenue. The project's "fair share" of the improvement is 41%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
		Significant	3.12-6m	Cypress Avenue/I-5 Southbound On-Ramp Merge: Add a third southbound travel lane to I-5. This improvement will result in LOS E operations during the weekday PM peak hour and LOS C operations during the Saturday mid-day peak hour at the merge to I-5 to from the southbound Cypress Avenue on-ramp. The project's "fair share" of the improvement is 27%. Payment of fees defined in the Shasta County Regional Improvement Program Impact Fee Nexus Study would cover the project's "fair share."	Significant and Unavoidable
3.12-7	Potential increase in hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Potentially Significant	3.12-7	All roadways and access points shall be designed according to current Shasta County roadway improvement standards, to the satisfaction of the County's Public Works Department.	Less Than Significant
3.12-8	Potential inadequate emergency access.	Potentially Significant	3.12-8	The site plan shall be reviewed by the local fire and police departments to ensure adequate emergency access, to the satisfaction of the County's Public Works Department.	Less Than Significant
3.12-9	Potential inadequate parking supply.	Potentially Significant	3.12-9	Parking supply shall be consistent with County zoning requirements and/or standard industry parking ratios for commercial retail centers, to the satisfaction of the County's Public Works Division and Planning Department.	Less Than Significant
3.12-10	Potential conflict with adopted policies, plans or programs supporting alternative transportation.	Less Than Significant		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.12-11	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks	No Impact		No mitigation measures are required.	
3.13 Utilities and Service Systems					
3.13-1	Potential to violate RWQCB, Central Valley Region wastewater treatment requirements and cause degradation of groundwater quality.	Potentially Significant	3.13-1	The project proponent shall establish an appropriate mechanism to maintain and operate the on-site wastewater treatment facility and the facility shall be in place, operational, and certified by the Regional Board prior to issuance of certificates of occupancy.	Less Than Significant
3.13-2	Construction of new water or wastewater treatment facilities, which could cause significant environmental effects.	Less Than Significant		No additional mitigation measures are required.	
3.13-3	Construction of new storm water drainage facilities, which could cause significant environmental effects.	Less Than Significant		No additional mitigation measures are required.	
3.13-4	Adequacy of water supplies to serve the proposed project.	Less Than Significant		No mitigation measures are required.	