

REPORT TO SHASTA COUNTY RTPA

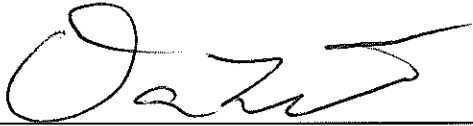
SUBJECT	MEETING DATE	ITEM NUMBER
Correspondence	12/9/08	4-9

RECOMMENDATION

This item is for information only.

SUMMARY

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



Daniel S. Little, AICP, Executive Director

DSL/jac

Attachment: Multi-County Pledge to Share Burden and Benefit of Regional GIS Coordination
Shasta County Comment Letter: Tehama County General Plan EIR
Caltrans District 2 Comment Letter: Tehama County General Plan EIR



Multi-County Pledge to Share Burden and Benefit of Regional GIS Coordination

We the Regional Transportation Planning Agencies (RTPA's) of District 2 **pledge to share the burden and benefit of developing new data, merging regional GIS layers, and filling critical data gaps. We seek to enlarge technical capacities, explore new solutions to long-standing issues, and more efficiently plan and deliver transportation projects that improve California's mobility and quality of life.** Our ranks include Shasta, Tehama, Modoc, Lassen, and Trinity County. Bordering Glenn and Butte County are key partners in District 3.

With the support and cooperation of Caltrans District 2, we have met quarterly as a RTPA Task Force since 2003. This long-standing and ongoing commitment to interregional communication and collaboration among Northern Region agencies routinely expands opportunities and inspires new levels of partnership.

On the Blueprint planning front, the Shasta County RTPA, Tehama County Transportation Commission, and Trinity County Transportation Commission have obtained blueprint grant funds. As the only MPO in District 2, Shasta County RTPA is working closely with Tehama County and the Far North Regional GIS Council to ensure that emerging modeling tools and methods are relevant and scalable for individual regions. Shasta County RTPA's FY 2008/09 application aims to establish an interregional data platform for compiling and exchanging GIS data sets with other regions that utilize UPlan modeling software. Other FY 2008/09 Blueprint grant applicants include Tehama and Modoc RTPAs, which are focused on the technical building blocks necessary for intraregional coordination and future planning efforts across the greater Northern Region.

Such partnerships that are aimed at developing compatible technology and methods are one of the key building blocks of interregional planning. Over time, as data sets are developed and/or merged with analogous data from other regions, new and more frequent applications of regional planning will become viable.

In District 3, Glenn County Transportation Commission and Butte County Council of Governments (BCAG) are likewise Blueprint grant recipients and agents of regional planning in the Sacramento Valley. Glenn County Transportation Commission has submitted a FY 2008/09 grant application for completing public outreach activities. BCAG hosted the first scenario planning workshop in the Sacramento Valley and a growing number of public, private, and non-profit entities recently returned to Chico for the Great Valley Center's "Mapping Our Future" forum.

Other examples of interregional projects that increase mobility include the Fix 5 Partnership, consensus on CMIA project funding priorities across the entire North State Super Region, CALnections web-based trip planner, and a nine county Northern California Internet Transit Trip Planning Services study. As both individual agencies and a collective region, we are committed to nurturing and further cultivating these types of partnerships.

Regional blueprint grants have been a driving force in spurring and sustaining this momentum for regional coordination. Funding for new and ongoing blueprint project applications in the Northern Region will help insure that modeling tools, methodologies, and data sets are interchangeable, resulting in more timely and cost-effective transportation project planning and delivery.

Respectfully submitted,



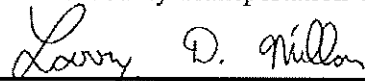
Dan Little, Executive Director
Shasta County Regional Transportation Planning Agency



Carl Bonomini, Executive Secretary
Trinity County Transportation Commission



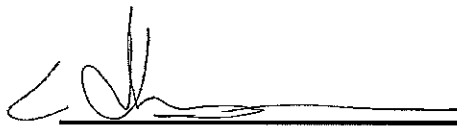
Pam Couch, Director
Modoc County Transportation Commission



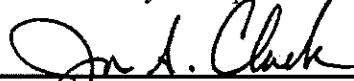
Larry Millar, Executive Secretary
Lassen County Transportation Commission



Gary Antone, Executive Director
Tehama County Transportation Commission



Dan Obermeyer, Director
Glenn County Transportation Commission



Jon Clark, Director
Butte County Association of Governments

- c: Marilee Mortenson, Regional Blueprint Project Manager, California Department of Transportation
Tim Huckabay, Deputy Director, Caltrans District 2
Dan Little, Executive Director, Shasta County Regional Transportation Planning Agency
Carl Bonomini, Director, Trinity County Transportation Commission
Pam Couch, Director, Modoc County Transportation Commission
Larry Millar, Executive Secretary, Lassen County Transportation Commission
Gary Antone, Executive Director, Tehama County Transportation Commission
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PATRICK J. MINTURN, DIRECTOR
C. TROY BARTOLOMEI, DEPUTY
SCOTT G. WAHL, DEPUTY

November 3, 2008

FCR 010010

George Robson, Director
Tehama County Planning Department
444 Oak Street, Room 12
Red Bluff, CA 96080

Subject: 2008-2028 Tehama County General Plan Update

Dear Mr. Robson:

The Shasta County Department of Public Works has reviewed the Environmental Impact Report (EIR) for the 2008-2028 Tehama County General Plan Update. We see that the General Plan would focus growth in the north I-5 corridor of Tehama County. This would increase trip generation in that region by 170,000 trips per day. This is nearly a ten-fold increase over existing conditions. The EIR recognizes that most of these 170,000 new trips would use the I-5 corridor. Most of these trips would traverse the far northerly segment thereof, to the Shasta County line and beyond. The EIR does not quantify the impact of these trips upon Shasta County interchanges and roads. This needs to be addressed.

Shasta County's Southern Region Traffic Study was based on the current Shasta and Tehama County general plans. It provides a ready baseline to evaluate these 170,000 new trips. We recommend that it be utilized to prepare a 20-year cumulative analysis, with the following elements:

1. Project trip distribution into and within Shasta County: Total added project trips to Shasta County, and distribution of those trips onto Shasta County's South Region transportation network;
2. Project contribution to existing identified improvement needs: Quantify the percentage of project trips to the total trips at each facility identified for improvements in the South Region Traffic Study;
3. Project impacts resulting in need for new improvements: Determine if project trips will result in a need for

additional improvements (not identified in the South Region Traffic Study) to maintain levels of service. Determine the cost of these improvements; and

4. Proposed mitigation and alternatives for these identified impacts, and a determination by the lead agency whether these measures will be implemented.

Thank you for this opportunity for input. We look forward to the completion of this important document.

Very truly yours,



Patrick J. Minturn, Director

c: Les Baugh, Supervisor, District 5
Larry Lees, Chief Administrative Officer
Russ Mull, Director, Department of Resource Management
Scott Morgan, City Manager, City of Anderson
Dan Little, Executive Director, Regional Transportation
Planning Agency

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*Flex your power!
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November 14, 2008

IGR/CEQA Review
Teh-Admin-
Tehama County General Plan Update Draft EIR
SCH# 2007072062

Mr. George Robson
Tehama County Planning Department
444 Oak Street, Room 1
Courthouse Annex
Red Bluff, CA 96080

Dear Mr. Robson:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the General Plan update submitted on behalf of Tehama County. Tehama County's General Plan update differs from the previous General Plan in that it identifies Special Plan areas adjacent to Interstate 5 (I-5) that are designated for higher residential densities that could significantly increase population densities in the County. Among the Special Plan areas are the corridor between the City of Red Bluff and the Shasta County line and the area west of I-5 and south of the City of Corning. The DEIR does not adequately analyze the impacts nor identify mitigation measures for accommodating these land use changes. It is therefore not possible for Caltrans to assess the ability of I-5 to serve both the local and regional traveling public in and through Tehama County and neighboring Shasta County.

In addition to reviewing the DEIR, the General Plan update draft elements, and the Background Report, Caltrans also reviewed the 2006 Regional Transportation Plan (RTP) for Tehama County in order to assess potential circulation and transportation impacts. Our primary concerns include:

- There was no quantitative analysis of the plan alternatives. The "preferred" alternative was chosen and analyzed, but not the other alternatives.
- The DEIR, draft General Plan and Background Report did not analyze possible impacts to the State Highways, specifically I-5.
- State highways are not named for inclusion in any "future" analysis of impacts and mitigations from future developments.
- The new remote development proposals, especially along the south I-5 corridor, are inconsistent with General Plan goals to concentrate development "principally within existing developed or urbanized areas."

Mr. George Robson
November 14, 2008
Page 2

Our specific comments are attached. Thank you for the opportunity to provide comments on the DEIR and the updated General Plan. If you have any questions, please call me at 229-0517.

Sincerely,

MICHELLE MILLETTE, Chief
Office of Community Planning
District 2

Attachment

c: Tehama County TC
Shasta RTPA
Shasta County Planning
State Clearinghouse

TEHAMA COUNTY GENERAL PLAN UPDATE DEIR

Caltrans District 2 Comments

DEIR page 1.0-19, Executive Summary – Impact 4.13.1, Caltrans request that the statement be amended to include the State highway system since Caltrans will rely on the General Plan policies and implementation measures to avoid, reduce impacts, or mitigate impacts to the County roadways and the State Highway System.

DEIR page 1.0-20 Executive Summary, Impact 4.13.7. Caltrans disagrees that there are no feasible mitigation measures to reduce traffic impacts. We recommend that this discussion be revised to reflect the General Plan policies and implementation measures to mitigate traffic impacts that Caltrans will rely on to reduce traffic impacts even if they are still concluded to be significant and unavoidable. The policies and implementation measures include – CIR-1.1, CIR-1.1a, CIR-1.1b, CIR-1.1c, CIR-1.1d, CIR-1.2, CIR-1.2a, CIR-1.2b, CIR-1.2c, CIR-1.3, CIR-1.3a, CIR-1.4, CIR-1.4a, CIR-1.5, CIR-1.5a, CIR-1.7, CIR-1.7a, CIR-1.9, CIR-1.10, CIR-1.10a, CIR-4.1a, CIR-4.1b, CIR-4.2, CIR-4.2a, CIR-4.2b, CIR-4.3, CIR-4.3a, CIR-5.1, CIR-5.1a, CIR-5.1b, CIR-5.2, CIR-5.2a, CIR-5.3, CIR-5.3a. The DEIR identifies that a county roadway fee and proportionate share mitigation from new development will be required. The DEIR also recognizes the Fix Five effort. The DEIR should also include the future funding scenarios recognized in the Regional Transportation Plan that may necessitate that the County form zones of benefit, self-help tax initiatives, grant funding, and public-private partnerships to fund the County and State roadway improvements needed to accommodate the growth indicated in the General Plan.

DEIR page 4.13.23 includes a discussion that the policies and implementation measures apply to the highways. However, if these policies are referenced individually without specifically stating “including State highways” the readers or decision-makers may inadvertently infer that the State highways are not included. Therefore, it is requested that the applicable policies referring to roadways and County roadways also state, “and the State highways.”

DEIR page 3.0-6, The Project Objectives include, consistent with Goal LU-5, “Focus growth adjacent to the I-5 corridor in the northern portion of the County in order to facilitate circulation, reduce transportation air quality impacts, minimize agricultural conversion and reduce impacts to sensitive biological species along the Sacramento River corridor.” Another objective consistent with Goal LU-1, LU-3, and LU-4 states, “Accommodate a reasonable amount of growth (i.e. housing and employment) principally within existing developed or urbanized areas.”

These are competing and opposing objectives where one encourages infill and concentric growth adjacent to existing developed areas with little discussion in the General Plan or DEIR. The other, provides substantial discussion of the characteristics desired to allow growth at higher densities, to encourage leap frog development away from existing communities as long as the parcels are large enough to financially support basic services, even though it cannot address the provision of efficient government and social services. It also creates a need for increased travel from existing communities to serve the outlying development areas. This issue questions whether the north and south I-5 corridor Special Plan areas are consistent with Goals LU-4 and LU-8. By its nature, the General Plan is crafted to rely on the Interstate system, which makes the provision of adequate mitigation for traffic impacts crucial for the continued efficient operation of the freeway consistent with Land Use Goal LU-2, Public Services Goal PS-3, and the goals, policies and implementation measures of the Circulation Element. We again request that the applicable goals, policies, and implementation measures of the General Plan be revised to clearly address the State highway system to mitigate the impacts to the highway system.

DEIR page 3.0-9, Circulation Map. Caltrans appreciates the inclusion of parallel transportation facilities to I-5 in the proposed transportation enhancements. This would lessen the burden on I-5. It should be noted that a complete network of roadways will be required to adequately address the transportation needs for the proposed General Plan. Lack of a roadway network will focus all travel (and thus impacts) to one or two facilities which will quickly overwhelm the ability of those facilities to provide adequate capacity. This is also a concern (potential impact) for public safety and emergency evacuation if the system must rely on one facility that could be overwhelmed when an emergency event occurs. A network provides many options to reach the same destination and thus distributes the demand across many facilities.

DEIR page 3.0-20 presents the Land Use policies and implementation measures. Implementation measure LU-3-1a includes "... require new development to pay their reasonable fair-share towards...." The language is too vague and ambiguous to incorporate as a mitigation measure. Caltrans requests that "reasonable fair-share" be replaced with "proportionate share." This is correctly discussed on DEIR Page 4.13.22 but not on Page 4.13.23.

DEIR page 4.0-6 discusses that Scenario #3 reflects the population growth expected based on historic growth rates and California Department of Finance (DOF) projections. How do these projections compare to the information presented in the tables in DEIR page 4.13.19? What transportation facilities would be needed to accommodate the expected projected growth?

DEIR page 4.3-27, Impact 4.3.6, states that, "in order to reduce the number of vehicle miles traveled in the County...the General Plan proposes to increase residential densities adjacent to the I-5 corridor..." This discussion fails to recognize that it would also increase traffic impacts to I-5 and fails to compare impacts to development adjacent to existing communities where there is a full complement of existing jobs, shopping, and government and social services. It also fails to present any data in the form of a vehicle miles traveled analysis to support the discussion. Therefore, we cannot agree with the statements made. In the absence of an analysis, it is likely that leap frog development will increase vehicle miles traveled to provide social and government services, jobs, and shopping that are not available in the Special Plan areas. If the County disagrees, then the conclusions should be supported by a technical analysis.

DEIR page 4.11-17 states that, "These policies may result in new growth in Tehama County; however, the rate of growth is unlikely to increase significantly unless new employment sources are established within, or near the County." This statement is followed by a footnote that states, "The 2000 Census reports that the mean time to work for Tehama County residents is approximately 22 minutes. Given that most of the population is along the I-5 corridor and the majority employment centers of Redding and Chico are more than 20 minutes away, this suggests that the majority of jobs are within the County."

We question this statement. The information identifies an indirect impact that increased traffic impacts will occur on I-5 due to the proximity of north and south County corridor development to the freeway. As indicated by Table 4.11-2, the largest growing population area of the unincorporated County is the Bowman Road area. Also the majority of the Special Plan areas of the north County corridor are located within the 22 minute commute to Redding. The Special Plan area shown south of Corning is also located within the 22 minute commute to Glenn County and points beyond. The statement also does not look at Census information relating to the number of Tehama County residents that are employed in Shasta, Butte, and Glenn Counties. According to the 2000 U. S. Census, 2,464 Tehama County residents work in Shasta County, 1,137 work in Butte County, and 528 work in Glenn County (represents approximately 6.6% of County residents work in adjoining counties), (Source, 2000 Census: <http://www.census.gov/population/www/cen2000/commuting/index.html#CA>). Since the Special Plan areas are located in proximity to these adjoining jurisdictions, the Census information indicates that a growth inducing impact on the adjoining jurisdictions is likely to occur.

DEIR page 4.12-29, Impacts 4.12.6.1 and 4.12.6.2. This discussion concludes that no mitigation measures are required. The discussion identifies that the County is served by a single landfill with several transfer stations. The discussion does not identify that the increased demands for solid waste services in the north and south County will require increased traffic to transport solid waste and recyclables. The mitigation measures should address planning for transfer stations to serve the north and south County to reduce truck trips.

Transportation and Circulation

DEIR page 4.13-5, Figure 4.13-2, Proposed Safety and Circulation Enhancements Map, shows alternate routes. Will the alternate routes be formalized with adopted plan lines to establish and preserve the alignments and provide a comprehensive plan for a roadway network?

DEIR page 4.13-6, Table 4.13-3. Caltrans requests that the table reflect the following for the State Highway system. LOS: Acceptable C, Unacceptable D; Significance threshold: LOS D; Mitigation required is acceptable as stated in the table.

DEIR page 4.13-7, Table 4.13-4 and Table 6 of Appendix 4.13.1. It should be noted that the ADT's for the corresponding LOS are only achieved under ideal or perfect conditions which do not exist in these segments. Factors such as terrain, percent trucks, etc. must be considered in determining the actual LOS. As presented, the tables are misleading.

DEIR page 4.13-7, Table 4.13-5 is the same as Appendix 4.13.1, Table 7, page 12, however, Route 892 should be corrected in the Appendix table to reflect, Route 89 and footnote 2.

Several significant errors are noted in Table 9 of Appendix 4.13.1 as compared to published existing traffic volumes.

DEIR page 4.13-8, Table 4.13-6, Regional Transportation Plan (RTP) Figure 12, and Appendix 4.13.1, Table 8 report 2005 LOS C for the segment from Nine Mile Hill to the Shasta County line. DEIR Table 4.13-13 on page 4.13-20 copied from the RTP projects LOS F in 2030 for the two segments from Jelly's Ferry interchange to the Shasta County line. Appendix 4.13.1 Table 10 projects LOS C in 2030 for Segments 15 and 16 between Sunset Hills and the Shasta County line which is the same as the existing conditions. The difference in ADT volumes between the RTP projection and the Daily Traffic Model Report for 2030 is 20,000 to almost 30,000 daily trips. The DEIR includes the RTP projections but does not include the Appendix projections.

We agree with the projection of LOS F in Appendix 4.13, Table 8 for I-5 in northern Tehama County in 2025. However, Appendix 4.13 Table 10, page 17 projects LOS C for 2030 and appears incorrect. This is the same LOS as existing conditions shown in Appendix 4.13 Table 9 and does not agree with the projections of LOS F in the RTP, I-5 Transportation Concept Report (TCR), or Sun City Del Webb Traffic Study. The RTP was based on the Caltrans I-5 TCR draft traffic projections. The TCR forecasts for I-5 in Tehama County take into consideration past traffic growth trends, current and proposed developments, the current general plan and other statewide and nationwide travel information, thus these projections do not reflect changes in the proposed general plan and are not representative of the likely traffic volumes that can be anticipated as a result of the proposed general plan. Caltrans requests that the DEIR include traffic projections and level of service for State highways that reflect the proposed general plan. Explain the factors for these differences and the validity of the 2030 Daily Trip Traffic Model.

Also DEIR page 4.13-8, Table 4.13-6 (2005) is footnoted from the RTP but does not match with Table 4.13-7 (2006) beginning on the same page, for existing conditions. The RTP reports LOS B while the Appendix 4.13.1 - Daily Traffic Report Model Table 8 reports LOS A. Many locations where LOS C is shown on the RTP table, LOS B is reported on Table 4.13-7. A letter degradation in level of service in a one-year difference of existing conditions is a substantial change. Why do the existing conditions differ?

Based on the footnotes, was Table 4.13-6 intended to be the same as Table 8 in Appendix 4.13.1? Please explain the assumptions or factors for the differences in existing conditions. Are the specific roadway conditions (topography, number of trucks, etc.) considered in the 2030 Daily Traffic Report?

For future projections, Table 8 in Appendix 4.13.1 notes that it does not include the proposed Del Webb Development. What pending or approved developments are considered? What assumptions or growth rate are the projections based on? If these projections are to be valid, they must include projected traffic volumes from approved developments and from the anticipated development in the general plan.

DEIR page 4.13-14 describes the Regional Transportation Plan (RTP). The information should be amended to include that the Tehama County Transportation Commission recommends to the California Transportation Commission transportation funding priorities in Tehama County.

DEIR page 4.13-15 states that, "the Bikeways Plan will expire in October 2007." Will, or has, the Plan been readopted?

DEIR page 4.13-17, states that Sun City would allow 4,600 residential units and 230,000 square feet of commercial development. Table 6.0-2, page 6.0-3, reports that Sun City allows 3,700 residential units and 279 acres of commercial development. These inconsistencies and the differences between the approved Sun City EIR and the current approvals should be explained and/or corrected.

DEIR page 4.13.19 presents several tables. The tables would be more helpful with summary totals. No analysis of the results is presented. What transportation facilities are needed to accommodate the level of growth presented? A Special Plan area is shown in Region 3 south of Corning. What amount and intensity of development could this area support? What is anticipated or assumed? The densities considered for this South County Special Plan area were not considered in the recent Caltrans I-5 TCR analysis or the 2006 RTP. What transportation facilities are needed to accommodate proposed General Plan growth in Region 3? As presented, it appears the General Plan provides inadequate information to consider the potential magnitude of impacts from this proposed Special Plan area. Please provide the appropriate analysis so that the impacts can be determined.

DEIR Page 4.13-20, Table 4.13-13 projects 2030 Peak LOS for Segment 1 (the South County line to Liberal Avenue) as LOS F which disagrees with the Tehama RTP and the I-5 TCR which both project LOS D. The RTP and the I-5 TCR project 2030 Average Annual Daily Traffic (AADT) LOS as D for Segments 2 and 3 that disagree with the LOS E shown in the DEIR. Is this a result of the proposed south County Special Plan area adjacent to the west side of I-5 and the Sour Grass Creek overcrossing? If so, this should be clearly stated. Please explain the differences and disclose the amount and intensity of density assumed. Segment 4 also disagrees with LOS F shown in the DEIR and LOS E projected in the RTP and the I-5 TCR. Segments 10 and 11 in the DEIR also disagree with the RTP and the I-5 TCR for 2030 AADT LOS E and F. The table's projected 2030 LOS for I-5 also does not match Table 10 in the Appendix 4.13.1. Please explain the factors for all of these differences.

Several errors are also noted in Table 1 of Appendix 4.13.1 as compared to published existing traffic volumes. Please explain the factors for these differences.

DEIR Page 4.13-21, as previously requested, Caltrans requests that the applicable policies and implementation measures for roadways be amended to include the State highway system since Caltrans will rely on the General Plan policies and implementation measures to avoid, reduce, or mitigate impacts to the County roadways and the State Highway System. For clarification where implementation measures in the General Plan or mitigation measures in the DEIR are referenced individually without the context of the entire Circulation Element or the DEIR, such as measures CIR 1.1a, CIR-1.2a, CIR-1.3a, we request that the measures be amended regarding roadways to specifically include “and the State highway system” or “including the State highway system” so that readers and decision-makers clearly understand that roadways address the entire transportation system of both County roads and the State highway system. Caltrans will rely on the General Plan policies and implementation measures which include – CIR-1.1, CIR-1.1a, CIR-1.1b, CIR-1.1c, CIR-1.1d, CIR-1.2, CIR-1.2a, CIR-1.2b, CIR-1.2c, CIR-1.3, CIR-1.3a, CIR-1.4, CIR-1.4a, CIR-1.5, CIR-1.5a, CIR-1.7, CIR-1.7a, CIR-1.9, CIR-1.10, CIR-1.10a, CIR-4.1a, CIR-4.1b, CIR-4.2, CIR-4.2a, CIR-4.2b, CIR-4.3, CIR-4.3a, CIR-5.1, CIR-5.1a, CIR-5.1b, CIR-5.2, CIR-5.2a, CIR-5.3, CIR-5.3a.

As previously requested the reference to implementation measure CIR 1.3c on DEIR Page 4.13-22 and LU-3.1a on page 4.13.23 should be changed to include the State highways.

As reflected in Mitigation Measure 4.13.1a, reference to implementation measure CIR 1.3a on DEIR Page 4.13-22 should discuss that the Draft General Plan implementation measure is inadequate and needs to be amended in the General Plan since it states that, “the County will consider adoption of a roadway impact fee on all new development through fee adoption by ordinance, development agreements, conditions of approval and other permit entitlements. In the absence of an impact fee the County Public Works Director may determine the value of proportionate share of impact associated with the proposed project.” We also request that the implementation measure be changed from, “...all proposed development mitigate its proportionate share impacts on the County roadways, transit, and pedestrian systems.” To include the State highways, “...all proposed development mitigate its proportionate share impacts on the County roadways, the State Highway system, transit, and pedestrian systems.” As stated in Mitigation Measure 4.13.1a, we agree with the change of “consider” to “shall” and the amendment addressing transit. For clarification it is also recommended that the “may” in the last sentence should be changed to “will.”

DEIR page 4.13-24, as indicated in Mitigation Measure 4.13.1b, for Policies CIR 1.1c and 1.1d the EIR should direct that the Draft General Plan reference to the Highway Capacity Manual delete Institute of Transportation Engineers and replace with Transportation Research Board, National Resource Council.

DEIR page 4.13-30, 31 and 6.0-27, Cumulative impacts. As discussed in the DEIR, the I-5 cumulative impacts could largely be addressed with participation and adoption of Fix 5. We appreciate the County's support of the Fix 5 effort. It should be noted that the Fix 5 study was prepared prior to the proposed General Plan and is based on historic trends from the existing General Plan. Therefore, the proposed addition of the Special Plan areas in the north and south County along the I-5 corridor could result in I-5 impacts such that even with the addition of a third lane on I-5 an acceptable level of service may not be achieved. There should be discussion of how the cumulative impacts to I-5 will be addressed if the County does not ultimately adopt the Fix 5 fees. The benefits of Fix 5 include that county-wide impacts are addressed, it is fair since it applies to all development, not just developments that require EIR's, it is proactive, results in a fraction of the cost to development of mitigating full proportional impacts, it provides a mechanism to fund and build the improvements that will be needed in the next 20-30 yrs, developers know traffic mitigation costs at the beginning of process rather than having to calculate project-by-project, and it leverages other funding sources.

DEIR page 5.0-36 and page 7.0-5. We do not agree that since the State highway system is outside the County's jurisdiction that the County cannot insure that the improvements would be constructed. Caltrans cannot create fee programs to insure highway improvements are constructed. However, we can and do have the ability to collect mitigation funds imposed by the lead agency directly from developers and do so in many areas of the State. Caltrans strives to work in partnership with lead agencies (cities and counties) and to mutually agree on appropriate transportation projects to mitigate the impacts of development on the State highway system. Caltrans is agreeable to either accepting the mitigation fees directly or having them go to the lead agency for highway improvement projects – in this instance, Tehama County.

As mitigation for direct and cumulative impacts, many local agencies (cities and counties) and private developers fund and build state highway improvements projects through the encroachment permit process.

It is suggested that the references that the County cannot build the improvements or be certain that the improvements will be built because it is not in their jurisdiction should be reconsidered. The forefront issue should be whether there is an obligation to mitigate per CEQA the Plan's impacts, whether the impacts can be reduced or avoided, and as provided in Mitigation Measure 4.13.1a that there are methods to insure and monitor their construction through conditions of approval, development agreements, and cooperative agreements. The recommended mitigation measures that include the requirements of other agencies, such as Caltrans, the California Department of Fish and Game, the Regional Water Quality Control Board, the US Army Corps of Engineers, or involvement by Shasta County or the City of Redding, is fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the Tehama County consistent with Section 15126.4 of the CEQA Guidelines.

To this end, it is further recommended that the transportation mitigation be amended to include the following,

For specific development projects, the project applicants/developer(s) shall contribute a proportionate share amount for all needed improvements, both within the Tehama County and outside the County's jurisdiction. The proportionate share contribution shall be determined by Tehama County based on a traffic study or subsequent traffic monitoring studies required of the developer. The proportionate share calculation shall also be determined in consultation with Caltrans and the Tehama County Transportation Commission, which includes representatives from Tehama County and the cities of Red Bluff, Tehama, and Corning. The proportionate share funds may be held by Tehama County. As the improvements identified in the traffic study, conditions of approval, development agreement, and/or environmental document are proposed, planned, and designed for construction by the responsible agency, Tehama County will offer the developer's contribution to the appropriate agency. If the identified improvements are not constructed within the expected time horizon, or if findings are not made to demonstrate the improvements will be made, or if funding is not committed for construction within an agreed upon amount of time, the County may redirect the developer's fund contributions to other transportation improvements required to mitigate project impacts.

We suggest that it is poor advice that a lead agency cannot "assume" that another lead agency or responsible agency will not construct the improvements to mitigate the impacts of future development and therefore they are uncertain. The County can just as easily "assume" that the lead agency or responsible agency **will** build the identified transportation project. Additionally, the specific development project can fund and build the entire mitigation and get reimbursed from the lead agency, when the funding for the rest of the project is available. It is also important to note that based on the magnitude of development proposed for the north County corridor, impacts to transportation facilities in Shasta County will occur as demonstrated by the Sun City EIR. Therefore, coordination between the jurisdictions will need to occur to address traffic impacts

beyond the County's jurisdiction. The DEIR fails to address that traffic impacts to adjoining jurisdictions will occur from the proposed Special Plan areas.

DEIR page 5.0-36 and page 7.0-5, discusses that Alternative 3 would lead to greater impacts and would "most likely" require "twice" as many new roadways and transportation facilities. In the absence of any supporting analysis of vehicle miles traveled, we disagree with this discussion. It seems more likely that Alternative 3 would result in lesser impacts to transportation facilities than the proposed alternative since more of the infrastructure currently exists, there's already a roadway network (not focusing all travel to a single road – I-5), public transportation is more viable with compact developments and would likely be less viable with the distant high intensity developments proposed. Alternative 3 would locate development closer to existing jobs, commercial, industrial, schools, medical, social and government services etc., and thus would require less vehicle miles traveled.

SB 32 requires a reduction in greenhouse gasses to 1990 levels by 2020. The vast majority of this reduction will likely come from changes in transportation sources of greenhouse gasses (primarily cars and light trucks). One of the identified methods to achieve this reduction is through improved land use planning to reduce the length of trips and thus reduce the vehicle miles traveled (VMT) by focusing future development closer to services, employment, and shopping. The DEIR does not include an analysis of the preferred alternative's impact on VMT, nor does it compare the anticipated VMT of the alternatives. We are concerned the proposed preferred alternative will significantly and disproportionately increase the VMT with the focused high intensity development located distant from any existing and most future government and social services, shopping, and major employment.

Land Use

The primary concern relating to the proposed General Plan Alternative versus Alternative 2 is promoting the north and south I-5 corridor region development. This alternative relies heavily on the State highway system to accommodate proposed growth since it promotes development areas that are not contiguous to existing developed areas. This is in apparent conflict with the following land use goals, policies, and implementation measures (highlighted for emphasis). If these are not in conflict, please explain.

Goal LU-3: "To promote a development pattern which, whenever possible, maximizes the use of existing infrastructure prior to the construction of new infrastructure. Develop a land use pattern, which, to the maximum extent feasible, **minimizes the expenditure of public funds for infrastructure** construction and maintenance."

It appears likely the proposed general plan with the focused growth areas would significantly increase the public expenditure for infrastructure (particularly to I-5) as it does not currently exist to support the level of development proposed.

Goal LU-4: To designate land for commercial and industrial development that is appropriate for these purposes and allows opportunities for business and industrial firms. **Encourage compact development contiguous to existing urban centers, discourage linear and leapfrog development patterns.**

Goal LU- 5 – To promote a development that will accommodate growth, **consistent with other stated goals and** for growth projected for the planning period (2008-2028).

Goal LU-8: To develop land use patterns which **minimize travel to jobs and services.**

Policy LU-3.1 The County shall require the **use of existing infrastructure for new development** whenever possible.

Policy LU-3.2 The County shall develop a **land use pattern** that, to the maximum extent feasible, **minimizes the expenditure of public funds for water, sewer, flood control and road construction and maintenance.**

Policy OS-2.3 The County shall encourage and support a **compact and efficient** land development pattern.

Implementation Measure LU-3.1a requires the **use of existing infrastructure** for all new development. If existing infrastructure is not available or adequate, this measure requires new development to pay their reasonable fair-share towards the construction or expansion of infrastructure for roads, water, sewer, drainage and other infrastructure necessary for the completion of the development.

Policy LU-8.1 The County shall require that sites for moderate- to large-scale industrial and commercial development be located within or near the Urban Center and Town Center community types; within areas for which Specific Plans or Master Plans have been prepared; or within areas that contain, or are capable of containing, infrastructure adequate to support the use of the property for more intensive nonresidential purposes. Additionally, the County **shall consider the location of such land uses where appropriate to reduce travel and commute times and where appropriate to minimize the need to utilize Highways and Interstate Roadways for local service and convenience trips.**

As indicated by Table 4.11-2, the largest growing population area of the unincorporated County is the Bowman Road area. Policy LU-8.1 for the north I-5 corridor area does not reduce travel and commute times or the need to utilize the Interstate since it directs local service trips, major shopping, employment, medical, government and social services, and convenience trips to the communities of Cottonwood, Anderson, and Redding in southern Shasta County.