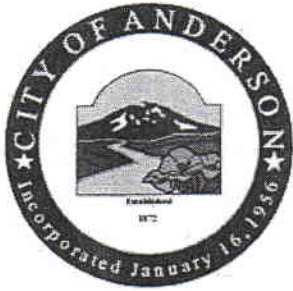


## Lio Salazar

---

**From:** Planning <planning@ci.anderson.ca.us>  
**Sent:** Monday, December 19, 2016 12:58 PM  
**To:** Lio Salazar  
**Cc:** Dave Durette; Jeff Kiser  
**Subject:** RE: GPA13-002, ZA13-004, and TR2003 (Stephens)  
**Attachments:** Good City Logo.jpg



December 19, 2016

Attn: Mr. Lio Salazar,

Thank you for the clarifying information Lio, it is appreciated. After reviewing the information, the City has the following comments in regards to the proposed Mitigated Negative Declaration for the referenced project.

- 1) The City of Anderson has concerns regarding the assumptions for traffic modeling in the CEQA analysis that excludes a substantial number of approved and/or pending projects because "they are "inactive" because of no activity and/or contact from the applicants in over a year, a change in ownership of the subject property, or where the applicant has indicated they do not intend to move forward with the project and/or intend to offer the property for sale." Unless the approvals for such projects has expired or been revoked, CEQA requires that the cumulative impacts discussion reflect the likelihood that impacts would occur as well as their severity based on a factually supportable methodology. The CEQA Guidelines outline two approaches for characterizing the cumulative impacts that may occur in the vicinity of a proposed project:
  - A. **Project list:** A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, projects outside the control of the agency (CEQA Guidelines Section 15130(b)(1)(A)).
  - B. **Summary of projections:** A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect (CEQA Guidelines Section 15130(b)(1)(B)). This summary can be supplemented with additional information, including a regional modeling program.

The City of Anderson understands that the County is the decision maker in determining the content of the pending and approved projects list, but we would encourage the County to be conservative in constructing the list to ensure that the project participates equitably in all mitigation necessary to address the potential impacts that the project will generate.

- 2) The City understands that the project mitigation will include payment into the established South County TIF programs. The project traffic analysis projects that approximately 60% of the project's peak hour traffic (approximately 62 peak hour trips) will traverse the Deschutes Road/I-5 Interchange and Highway 273/Rhonda Road area, and these trips will exacerbate traffic delays in the area. The City requests that the project mitigation

include collection of TIF fees to address the project's fare share contribution to improvements needed to address the cumulative impacts in these locations within the City of Anderson.

Thank you for the opportunity to comment on this projects CEQA analysis/MND.

Regards,

*Jim Hamilton*

Jim Hamilton, AICP

APlan Services – City of Anderson Contract Planner

**CITY OF ANDERSON**  
**1887 Howard Street**  
**Anderson, CA 96007**  
**Direct: (530) 378-6643**  
**Fax: (530) 378-6666**



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Region 1 – Northern  
601 Locust Street  
Redding, CA 96001  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



December 20, 2016

Lio Salazar  
Shasta County Department of Resource Management  
Planning Division  
1855 Placer Street, Suite 103  
Redding, CA 96001

**Subject: Review of the Mitigated Negative Declaration for General Plan Amendment 13-002, Zone Amendment 13-004, and Tract Map 2003 (Stephens), Shasta County, State Clearinghouse Number 2016122008**

Dear Mr. Salazar:

The California Department of Fish and Wildlife (Department) has reviewed the Mitigated Negative Declaration (MND) for the above-referenced project (Project). As a trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants and their habitat. As a responsible agency, the Department administers the California Endangered Species Act (CESA) and other provisions of the Fish and Game Code that conserve the State's fish and wildlife public trust resources. The Department offers the following comments and recommendations on this Project in our role as a trustee and responsible agency pursuant to the California Environmental Quality Act (CEQA), California Public Resources Code section 21000 et seq.

### **Project Description**

The Project, as described, is a:

*"General Plan and zone amendment from the Rural Residential A (RA) General Plan land use designation to the Suburban Residential-One Unit Per Acre (SR-1) General Plan land use designation and from the current Planned Development (PD) zone district to a PD zone district specific to the proposed project or other appropriate General Plan and Zoning designations to facilitate the merger and re-subdivision of three parcels of land totaling approximately 122-acres to create a proposed 102-parcel residential land division including 98 suburban residential lots ranging from 6,000-square-feet to 16,645-square-feet in size, a 36.6-acre open space parcel, a 59.1-acre residential parcel, and two approximately one-acre residential parcels."*

The 122-acre Project site is located on the west side of Rhonda Road, between the cities of Anderson and Cottonwood in Shasta County.

*Conserving California's Wildlife Since 1870*

## **Comments and Recommendations**

The MND discusses multiple documents developed for the Project but not provided to the Department until our request subsequent to the beginning of the review period for the MND. These documents include the Supplemental Biological Report dated June 24, 2013, the Wildfire-Fuel Vegetation Management Plan dated June 25, 2014, and the Response to DFW Comments prepared by ENPLAN dated June 16, 2016. The receipt of these documents in a timely manner would have allowed the Department to provide additional guidance and recommendations prior to the release of the MND, which may have negated the need to provide these further comments.

The Department provided comments on this Project during the early consultation period in a letter dated December 17, 2015, and conducted a site visit with Shasta County Department of Resource Management staff on December 1, 2015. The Department appreciates that several of the concerns raised in the original letter have been addressed in the MND and the inclusion of multiple mitigation measures in the MND to ensure the protection of natural resources. The following comments are intended to assist in further Project development and resource protection.

### Oak Woodland Mitigation

The Department appreciates the inclusion of measures in the MND to mitigate significant impacts to oak woodlands. Mitigation measure BIO.e.1 proposes in-kind mitigation for direct effects at a 2:1 ratio. Because the Project site contains intact oak woodland habitat with the documented potential to support special-status species, the Department recommends a mitigation ratio of at least 3:1 for direct impacts to oak woodlands.

The MND states that a minimum of 72-acres of blue oak woodland shall be acquired in Shasta County as a mitigation site. The Department requests that further explanation is provided in the MND as to how the proposed oak woodland mitigation acreage was calculated and a further discussion as to the criteria to be utilized in selecting the mitigation site.

The MND discusses the development of an Operations and Management Plan and deed restrictions for the mitigation site. The Department would like to offer assistance in reviewing these documents once developed and in the selection of the mitigation site.

### Vernal Pool and Wetland Protection

Mitigation measure BIO.a.1 discusses mitigation for indirect impacts to vernal pools and seasonal wetlands and proposes the purchase of mitigation credits, the preservation of vernal pool habitat, or the completion of vernal pool branchiopod

surveys to mitigate these impacts. Details regarding the amount of acreage indirectly impacted and the amount of credits required for mitigation are missing from the discussion and should be included in the MND. The mitigation measure states vernal pool branchiopod surveys should be conducted in coordination with the Department. These surveys should be coordinated with the U.S. Fish and Wildlife Service as well. The mitigation measure further states no further action is necessary by the applicant if it is determined vernal pool branchiopods are not present on the Project site, based on survey results. Vernal pools and wetlands are considered sensitive habitats by the Department and the Department has a "no net loss" policy regarding wetlands, including vernal pools, as discussed in our December 17, 2015 letter.

Regardless of the results of vernal pool branchiopod surveys, mitigation credits must be purchased to offset the significant impacts recognized in the MND. The MND recognizes that significant impacts to these habitats could result due to close proximity to construction activities, the modification of hydrologically connected upland areas, and urbanization of the upland areas leading to the potential generation and transmission of polluted runoff to these habitats. Vernal pool branchiopod surveys would inform the amount of mitigation credits required for purchase. The only mitigation site available for vernal pool and seasonal wetland credits within Shasta County is the Stillwater Mitigation Bank.

#### Bat Protection

Mitigation Measure BIO.d.1 states pre-construction bat roost surveys shall be conducted within two weeks of vegetation removal. The Department recommends that this time window be shortened to no more than seven days prior to construction. If a maternity roost is observed, the Department requests the proposed no-disturbance buffer be developed in consultation with the Department and that monitoring reports be sent to the Department along with the Shasta County Planning Division.

#### Hydrology and Water Quality

The Department appreciates that multiple low-impact development strategies will be utilized by the Project to minimize impacts to downstream aquatic habitats.

#### California Natural Diversity Database

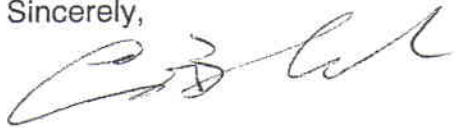
If any special-status species are found during future surveys for this Project, the Department requests occurrence details are submitted to the California Natural Diversity Database (CNDDDB). Instructions for providing data to the CNDDDB can be found at: <https://www.dfg.ca.gov/biogeodata/cnddb/>. Additionally, we request a copy of these forms be sent to the Department at: California Department of Fish and Wildlife, Attn: CEQA, 601 Locust Street, Redding, CA 96001. Species that warrant

Lio Salazar  
Shasta County Department of Resource Management  
December 20, 2016  
Page 4

reporting to the CNDDDB include Species of Special Concern, Fully Protected species, rare species as defined by the California Native Plant Society, species proposed for listing or candidate species, and species listed as threatened or endangered by either the State or federal Endangered Species Acts.

The Department appreciates the opportunity to provide comments during the environmental review process. If you have any questions, please contact Kristin Hubbard, Environmental Scientist, at (530) 225-2138, or by email at [Kristin.Hubbard@wildlife.ca.gov](mailto:Kristin.Hubbard@wildlife.ca.gov).

Sincerely,



**Curt Babcock**  
Habitat Conservation Program Manager

cc: Lio Salazar  
Shasta County Department of Resource Management/Planning Division  
[lsalazar@co.shasta.ca.us](mailto:lsalazar@co.shasta.ca.us)

Kristin Hubbard, Amy Henderson, Michael R. Harris  
California Department of Fish and Wildlife  
[Kristin.Hubbard@wildlife.ca.gov](mailto:Kristin.Hubbard@wildlife.ca.gov), [Amy.Henderson@wildlife.ca.gov](mailto:Amy.Henderson@wildlife.ca.gov),  
[Michael.R.Harris@wildlife.ca.gov](mailto:Michael.R.Harris@wildlife.ca.gov)

State Clearinghouse  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)



12-16-2016

From: Vince Dunn  
3668 Park Dr  
Cottonwood Ca 96022  
530-347-3109

Dear Mr Salazar,

I am writing this note in regards to the Proposed amendment 13-002, amendment 13-004 and tract map 2003.

First, I would like to thank you for talking with me some time ago.

My concerns lie with the overwhelming traffic it would create.

Also many years ago the subject of Electro Magnetic field was brought up in the press.

Thank You,  
Vince Dunn

RECEIVED  
SHASTA COUNTY

DEC 19 2016

DEPT OF RESOURCE MGMT  
PLANNING DIVISION

COTTONWOOD COMMUNITY CENTER & PARK

20595 Gas Point Road  
PO Box 1909  
Cottonwood, CA 96022  
(530) 347-1230

Fax Date: January 9, 2017

To: Lio Salazar

Comments: Rhonda Road Project



cottonwoodcommunitypark@gmail.com  
to lsalazar@co.shasta.ca.us

Mon, Jan 9 1:46 PM

comments on Rhonda Road

I am writing in regards to the proposed development, General Plan Amendment 13-002.

As a resident of Cottonwood and one who travels Rhonda Road on a regular basis, it concerns me that the traffic impact will not be addressed. Rhonda Road is a narrow windy road that is not very safe due to the fact there are no real shoulders and people drive way too fast. Years ago there was to be some work done to ease the traffic problem and add an arm off the freeway exit. This has never happened.

It is also my understanding that the area is an Electro Magnetic Field area. As we all know what the health ramifications of living in such an area. It is surprising to me that a development would even be considered.

Thank you,  
Mary O'Keeffe  
Sent from Windows Mail