Commissioner Chapin District 1, Commissioner Walgamuth District 4, Commissioner Wallner District 5

Shasta County Planning Commission

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Subject: 4/6/22 Tierra Robles FEIR Public Hearing Comments

Zone Amendment Z10-002 Tract Map 1996 SCH NO. 2012102051

Dear Honorable Commissioners,

I/We are requesting that you vote NO on the certification of the Tierra Robles Final Environmental Impact Report (FEIR) and NO on the required Rezoning Amendment for a Planned Development. Tierra Robles (TR) is the wrong development for rural Palo Cedro. Rezoning would be an unfortunate precedent for leapfrog development that will bring urban sprawl to our cherished community.

**My/Our personal comments and the prepared information below reflect “Here’s why to vote NO”:**

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**Thank you for considering this request to vote NO on the FEIR and the Rezoning Amendment. I/We urge you to do the right thing for our rural community.**

Name(s): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Signature(s)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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The FEIR has significant CEQA and General Plan deficiencies and inadequacies in the key areas of Wildfire and Wildfire Evacuation, Water Availability, Rezoning, the TR Homeowners Association and Sheriff/Fire Protection:

1. Wildfire and Wildfire Evacuation: TR is located in a Very High Fire Hazard Severity Zone. The land surrounding and including TR has a persistent history of wildfire, namely, the Chatham Ranch Fire, the 1999 Jones Valley Fire, the 2004 Bear Fire, the 2019 Mountain Fire, the 2021 Northgate Fire, and the 2021 Fawn Fire. The FEIR and its flawed Traffic Evacuation Study demonstrate the conclusion that TR IS a danger, with *significant* impact to the surrounding community. TR will add 2-3 miles of cars/RVs/boats/trailers evacuating on already over-capacity, two lane, narrow wildfire evacuation routes. The FEIR estimates evacuation to "safe areas" could take 1.5 to 3.5 hours with bumper-to-bumper traffic on ALL the surrounding roadways. The FEIR minimizes the impact of TR by saying it only will add 15 minutes to the longest evacuation time of 3.5 hours. 15 minutes could get you killed in a fast-moving wildfire! Also given that most wildfires are started from human activity, the additional 445 residents will increase the risk of wildfire ignition impacting the surrounding community which is not even addressed in the FEIR per CEQA requirements. Nor is the CEQA impact of 1,774 added daily vehicle trips included in the wildfire analysis.

TR DOES NOT MEET THE CEQA OR GENERAL PLAN REQUIREMENTS FOR SAFE WILDFIRE EVACUATION FOR EXISTING RESIDENTS OF PALO CEDRO/BELLA VISTA!

1. Water Availability: a) The FEIR and the developer continue to miscalculate the TR water usage from the Bella Vista Water District (BVWD) which results in a 272-acre feet/year shortfall. b) The FEIR and the developer does not identify a CA Supreme Court requirement for a "likely" source of supplemental water to be transferred to the BVWD in single and multiple drought years so that existing customers are not impacted by USBR Central Valley Project (CVP) water allocation cutbacks. c) No water agreement has been approved between the BVWD and the Clear Creek Community Services District (CCCSD). On 1/13/22 the CCCSD Board withdrew their interest in a water transfer with BVWD. CCCSD is also subject to the same CVP water allocation cutbacks as the BVWD and does not have sufficient groundwater supplies as a backup for their existing customers (CCCSD had to purchase 700-acre feet of water from the City of Redding in the 2021 drought). d) BVWD has not issued a required Will Serve Letter to the developer as there is no agreement for supplemental water. e) The General Plan W-c states "All proposed land divisions and developments in Shasta County shall have an adequate water supply of a quantity and quality for the planned uses". TR DOES NOT MEET CEQA OR GENERAL PLAN REQUIREMENTS ON WATER AVAILABILITY!
2. Zoning: TR lots are not consistent with the County's General Plan and current zoning (1 dwelling per 2 acres) and when compared to parcel sizes in the surrounding community. TR parcel sizes range from 1.19 acres to 6.81 acres. 44 homes or 26% are less than two acres, violating the existing zoning. Overall, 109 homes or 65% are one to less than 3-acre parcels vs. 23% in the surrounding community. The remaining 57 homes or 35% are greater than 3 acres vs. 77% in the surrounding community. Development must be consistent with the surrounding community in a way that fits with existing infrastructure for roads, water, and safe wildfire evacuation routes. TR IS A LEAPFROG DEVELOPMENT THAT CHANGES THE RURAL CHARACTER OF PALO CEDRO AND INVITES FUTURE URBAN SPRAWL. THE REZONING AMENDMENT SHOULD BE DENIED!
3. TRHOA:  The FEIR does not provide sufficient evidence under CEQA that ALL FEIR required mitigations will be successfully and reliably completed for the life of the development. The TRHOA is a "Super HOA" that is overtasked, likely underfunded in 18 of the 20 initial years and has weak enforcement powers. Critical wildfire mitigations include Wildland Fuel/Vegetation Management Plan, Oak Woodland Management Plan, Open Space and Resource Management Area management and oversight. Other tasks include road and stormwater maintenance and providing funding for mitigated off-site conservation easements. In lieu of forming a CSD, the FEIR does not specify a developer endowment fund of $1.4 million to cover expected budgetary shortfalls.

Since TR's land does not perk for traditional septic the TRHOA is responsible for the highly technical oversight, operation, and maintenance of an Onsite Waste Treatment Facility. The State had expressed a preference that such a system be overseen by a CSD, however this was dropped by the County and developer for unknown reasons. Compounding the concern is the miscalculation of TR’s water usage (272-acre feet/year shortfall). If true, the Onsite Waste Treatment System is incorrectly sized for the expected liquids and solids that will flow to the system. THE FEIR DOESN’T SUPPORT THE VIABILITY OF THE TR HOA!

1. Sheriff/Fire Protection: TR will add additional demand to underfunded and understaffed law enforcement and fire protection services. This area already experiences delayed sheriff response times and no additional officers, or substation are included in this proposal. Section 5.13.2 of the FEIR states "Implementation of the proposed project, combined with cumulative development within unincorporated Shasta County, would increase the demand for public services". However, the FEIR states "no mitigation measures are required. Cumulative impacts related to public services and fiscal impacts would be less than significant."  THIS IS ANYTHING BUT INSIGNIFICANT AND DEMONSTRATES THAT PUBLIC SAFETY WILL BE NEGATIVELY IMPACTED!