

APPENDIX A

Notice of Preparation and Scoping Comments

January 9, 2012

NOTICE OF PREPARATION



To Prepare A Program Environmental Impact Report For The 2030 Plumas County General Plan Update

Date: January 9, 2012

To: State Clearinghouse
Responsible Public Agencies
Trustee Agencies
Interested Parties

From: County of Plumas
Planning Department
555 Main Street
Quincy, CA 95971

Contact: Randy Wilson, Planning Director (randywilson@countyofplumas.com).

Subject: Notice of Preparation of a Draft Program Environmental Impact Report for the 2030 Plumas County General Plan Update.

Public Review Period: January 9, 2012 through February 8, 2012.

INTRODUCTION

The County of Plumas (County) is the Lead Agency for the preparation of a program Environmental Impact Report (EIR) addressing adoption and implementation of the County's 2030 General Plan Update (proposed project or Draft 2030 General Plan). This comprehensive update to the County's existing General Plan (adopted in 1984) is proposed in order to establish and implement new goals and policies for regulating development and balancing population growth with infrastructure availability, agricultural preservation, and natural resource protection.

Section 15082 of the State CEQA Guidelines requires that after a decision is made to prepare an EIR, the lead agency must prepare a Notice of Preparation (NOP) to inform all responsible and trustee agencies that an EIR will be prepared. The purpose of the NOP is to provide sufficient information about the proposed project and its potential environmental impacts to allow agencies and the public to make a meaningful response related to the scope and content of the EIR. An Initial Study has not been prepared for this project because the program EIR will address all environmental topics. Instead, a summarized description of the Draft 2030 General Plan and a description of potential environmental effects are attached to this NOP.

As part of the proposed project, the program EIR will analyze the Land Use and Circulation Diagrams; goals, policies, and implementation programs for all General Plan elements; and a range of alternatives to the proposed project.

PROJECT OVERVIEW

Pursuant to state and local guidelines implementing CEQA, Plumas County, as the lead agency, has determined that a program EIR is required to evaluate the proposed project. The program EIR will evaluate impacts to the following environmental resource topics:

- Aesthetics/Visual Resources
- Agriculture/Forestry
- Air Quality
- Biological Resources
- Cultural Resources
- Geology, Soils, & Minerals
- Global Climate Change
- Hazards & Hazardous Materials
- Hydrology & Water Quality
- Land Use/Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Circulation
- Utilities & Service Systems
- Cumulative Impacts/Growth Inducements and other CEQA topics

Plumas County is soliciting comments on specific issues to be included in the environmental analysis to ensure that the program EIR is thorough and adequate, and meets the needs of the public and responsible/reviewing agencies. Comments from interested parties on the scope of issues (listed above) to be evaluated in the program EIR are encouraged. The Draft 2030 General Plan is currently available for review and is posted on the internet at <http://www.countyofplumas.com>. Hard copies will be available for review at several repositories within the County, including all public libraries, as well as at the Plumas County Planning Department office at 555 Main Street, Quincy, CA 95971.

The Notice of Preparation public review period is from January 9, 2012 to February 8, 2012. Comments may be submitted to: Randy Wilson, Planning Director, at Plumas County Department, 555 Main Street, Quincy, CA 95971. Emailed comments should be submitted to: randywilson@countyofplumas.com. The phrase "2030 Plumas County General Plan NOP" should be included in the subject line.

Anyone wishing to make formal comments on the NOP must do so in writing by submitting comments to the addresses listed above. A scoping meeting will be provided to satisfy the requirements of the Public Resources Code, §21083.9, that require a Lead Agency to call at least one scoping meeting for a project such as the Draft 2030 General Plan. Interested persons should contact Randy Wilson, Planning Director, at (530) 283-7011 if they have questions, or if they need information regarding additional locations where the documents can be accessed.

EIR Scoping Meeting

The County of Plumas has set up a meeting to receive public input on the scope of the General Plan EIR. At this meeting, individuals, agencies, and organizations can provide the County with their input on the content and analysis conducted for the General Plan EIR.

Date: Thursday January 12, 2012

Time: 10:00 AM

Place: Mineral Building

Plumas-Sierra County Fairgrounds

Quincy, CA



Introduction

Section 15378 (a) of the State CEQA Guidelines defines a “project” to mean the whole of an action, which has a potential to result in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. This definition precludes an agency from evaluating only those aspects of a project under its jurisdiction or for which it has regulatory responsibility. The 2030 General Plan Update is defined to include all actions necessary to provide a comprehensive update of the existing Plumas County General Plan (adopted in 1984) and includes updated land use and circulation diagrams. The Draft 2030 General Plan would supersede the current or existing General Plan, with the exception of the Housing Element, which was recently update and certified in May 2010, in compliance with state deadlines. For this reason it will not be assessed in the EIR.

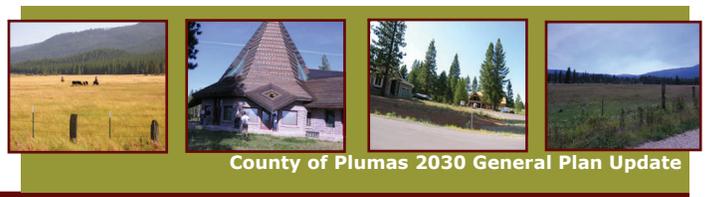
Project Location and Regional Setting

Plumas County is located in northern California. The County is bounded on the north by Lassen and Shasta Counties, on the west by Tehama and Butte Counties, on the south by Sierra and Yuba Counties, and on the east by Lassen County. Plumas County is approximately 2,618 square miles in area. The County is located in the northernmost portion of the Sierra Nevada mountain range and the southernmost portion of the Cascade mountain range. Thus, most of the County has mountainous terrain, interspersed with valleys. Approximately 76 percent of the land in Plumas County is National Forest land owned and managed by the U.S. Forest Service. The remainder of the County land is mostly in private ownership. The County’s landscape has been shaped by the network of streams and rivers that are all part of the greater Feather River Watershed. The Feather River Watershed, the largest watershed in the Sierra Nevada includes all of Plumas County and provides for over 22 million Californians’ water needs (60% of California’s population).

Project History, Planning Goals, and Community Outreach

In 2002 the Plumas Vision 2020 report was published. The report summarized a public process that included more than 30 community meetings and surveys that were distributed around the county and mailed to part-time residents. More than 1000 completed surveys were completed and returned. As a result of this outreach, seven topic areas were identified and the seven vision goals identified below in **Table 1** were developed.

Table 1. General Plan Vision Goals
To preserve and promote a rich environment of arts, culture and heritage in Plumas County into the 21st century.
To create and retain jobs, and reinvest wealth through our economy, community and natural resources.
To increase the communications and technology capability of Plumas County to function successfully in the 21st century.
To promote a future for Plumas County citizens in which land use decisions balance social, economic, and natural resource health.
To improve the health and well-being of all Plumas County residents.
To provide a range of facilities, programs and activities for the health & enjoyment of residents and visitors.
To recognize the well-being of local youth as fundamental to the health of the community as a whole.



The Plumas County Board of Supervisors reinstated the Planning Commission in March of 2005 in order to update the existing General Plan. In 2006 and 2007 a round of surveys now associated with the proposed project were administered by the Planning Commission across Plumas County with the intent to inform and solicit a broad perspective on the concerns and opinions of the public. The results confirmed the previous process outcomes and identified common community issues of importance.

Planning Goals

Both full-time and seasonal residents identified preserving open space, addressing water quality and erosion control, and managing growth as their top three issues of importance to be addressed in the Draft 2030 General Plan. This general plan update process was restarted in 2009 at a strategic kick-off public meeting of the Planning Commission. At that meeting and at several following sessions, the Planning Commission, with input from the public, developed the set of planning goals identified in **Table 2** to guide the update process.

Table 2. Planning Issues and Goals	
The Document	<ul style="list-style-type: none"> • The General Plan Update is legally defensible. • The General Plan Update is easily read and interpreted by the public. • The General Plan Update represents the voice of the people of Plumas County.
The Process	<ul style="list-style-type: none"> • The General Plan Update document was completed in two years and within budget. • Each General Plan element was developed with the appropriate focus and energy.
Environment	<ul style="list-style-type: none"> • The General Plan Update preserves and protects Plumas County’s natural beauty. • The General Plan Update protects natural habitats. • The General Plan Update meets and sustains the basic needs of clean and available water. • The General Plan Update meets and sustains the basic needs of clean air.
Economy	<ul style="list-style-type: none"> • The General Plan Update promotes economic development in harmony with surroundings. • The General Plan Update through its land-use and other policies sustains agriculture and forest industries. • The General Plan Update promotes the economics of pure water resources (quality and quantity) development. • The General Plan Update considers policies that address energy production and utilization.
Agriculture and Forestry	<ul style="list-style-type: none"> • The General Plan Update protects and sustains agricultural and forest lands and encourages best management practices. • The General Plan Update defines agricultural and forest lands with the intent of meeting the needs of the ranching and farming families.
Community	<ul style="list-style-type: none"> • The General Plan Update preserves and protects cultural, historical and archaeological resources. • The General Plan Update maintains Plumas County’s status as a premier recreation area. • The General Plan Update promotes both full time and part time residential opportunities in safe and livable housing. • The General Plan Update protects community character throughout Plumas County. • The General Plan Update protects and sustains existing communities. • The General Plan Update supports sustainable development. • The General Plan Update directs policies that compliment and support the County’s education needs. • The General Plan Update promotes policies that are consistent with public health and safety best management practices.



The Update Process and Community Outreach

The general plan update process has been organized into three key parts; comprehensive planning efforts to update the existing General Plan, transparent and inclusive public engagement efforts that inform the update process and products, and the environmental analysis efforts to disclose and mitigate potential impacts. The planning efforts include development of the General Plan vision and goals, review and identification of general plan best practices, development of the General Plan format and scope, and drafting of the General Plan document. The public engagement effort included the formation of five Supervisor District working groups, public workshops, and public presentations and hearings before the Planning Commission and Board of Supervisors. The Plumas County website was used on a regular basis to provide schedules, meeting agendas and summaries, workshop materials, presentations, maps and other pertinent materials to keep the public, stakeholders and other agencies up to date on the process and outcomes.

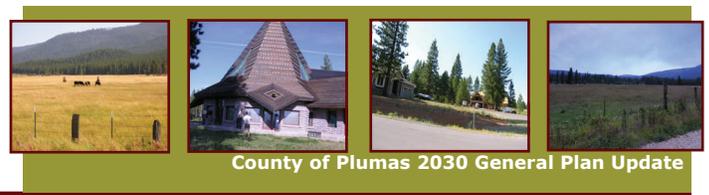
Goal development sessions were conducted at the Planning Commission's meetings during the months of July, August and September of 2009 to initiate the update process. The Planning Commission was asked to identify goals that would provide guidance and direct measurable outcomes for the update process. The Planning Commission's goals were presented and approved by the Board of Supervisors on October 13, 2009. Goals (identified in **Table 1**) were identified for the development of the update process, the environment, the economy, the community and agriculture/forestry.

The Board of Supervisors emphasized the importance of an inclusive and transparent public engagement process. A number of strategies were employed to engage residents across the County. One such strategy was to create resident working groups to assist in the development of the General Plan. Residents were solicited by Supervisorial District to represent the different geographic areas of the County as well as the different interests and issues. Staff of the United States Forest Service offered participation by district as well. Each County Supervisor reviewed the applications submitted from their District and selected the representatives based on their ability to represent the district and the issues in a fair and open manner. A total of 74 individuals from all corners of the County were selected. The working groups met for half or for all day sessions eight separate times; two of the eight sessions were joint sessions with the Planning Commission.

Two rounds of public workshops were held at five locations in the County. The objectives of the first round of workshops was to inform the public of the process and planning goals, to confirm community visions and to solicit feedback from the participants on the draft goals and policies that had been circulated and posted on the County's website. The second round of workshops' objectives included identifying major concerns with the draft General Plan and developing suggestions for alternatives to be evaluated in the environmental document.

General Plan Overview

A comprehensive General Plan is required by the State of California of every county and incorporated city for the "physical development of the county or city, and any land outside its boundaries which bears relation to its planning." (California Code Section 65300) Called the "constitution for future development" by the California Supreme Court, the General Plan is a guideline for growth and policy decisions. It is a comprehensive and long term document that sets policy for a 10 to 20 year planning horizon. This update of Plumas County's 1981 General Plan sets planning policy for the next 20 years.



County of Plumas 2030 General Plan Update

State law requires that General Plans be comprehensive in covering the entire planning area of the County or City's jurisdiction and comprehensive in covering a broad range of issues that are or are likely to be associated with physical growth and development within its jurisdiction. Specific planning topics known as "elements" are required by law and must be included in every General Plan. These required elements are: land use, circulation, housing, conservation, open space, noise and safety. The State of California allows for flexibility in how these elements are arranged, combined and for the opportunity to include optional elements that address specific issues that are of importance to the jurisdiction. All of the elements, whether required or optional, must have equal legal status. This means that no one element is superior to another and all elements are consistent with each other.

General Plan Elements

Element 1 - Land Use

The broadest section of the General Plan is the Land Use Element. The Land Use Element designates the type, intensity, and general distribution of uses of land for housing, business, industry, open space, education, public buildings and grounds, waste disposal facilities, and other categories of public and private uses. It is the guide to the physical form of the County. The element also includes the Countywide Land Use Map (see **Figure 1**) which graphically identifies where land use designations are applied. For Plumas County, the Land Use map also identifies areas for potential future expansion or growth. The Land Use Element also guides coordination and planning with other jurisdictions, such as the City of Portola, the United States Forest Service and the United States Military to avoid incompatible uses.

Element 2 - Housing

The Housing Element is a comprehensive assessment of current and projected housing needs for all economic segments of the County. In addition, it embodies policies for providing adequate housing and includes action programs for that purpose. Mandated by the State of California, the Housing Element is required to be updated at least every five years and must be approved by the State Department of Housing and Community Development. Plumas County's Housing Element was updated and approved in 2009. The Housing Element includes a section on the Summary of Needs and Constraints, a Housing Program with goals and policies, and a background report highlighting demographics, resources, and a review of the accomplishments in implementing the previous Housing Element. Plumas County's Housing Element was completed in a separate process from the rest of the General Plan update.

Element 3 - Noise

The Noise Element identifies and appraises noise problems within the County and forms the basis for land use distribution. The Noise Element addresses potential noise related issues within the County, as well as methods of limiting noise exposure to communities and natural resource areas. Programs and policies developed in the General Plan include protection of noise-sensitive land uses, consideration of noise impacted areas, and noise associated with airports.

Element 4 - Circulation

The Circulation Element is correlated with the Land Use Element and identifies the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals and other local public utilities and facilities. The Circulation Element provides a plan to guide the County's efforts relating to the movement of people, goods, energy, and other commodities. Topics of discussion include roads and highways, public transit, non-motorized transit including bicycles and pedestrians, rail, air, and movement of goods.



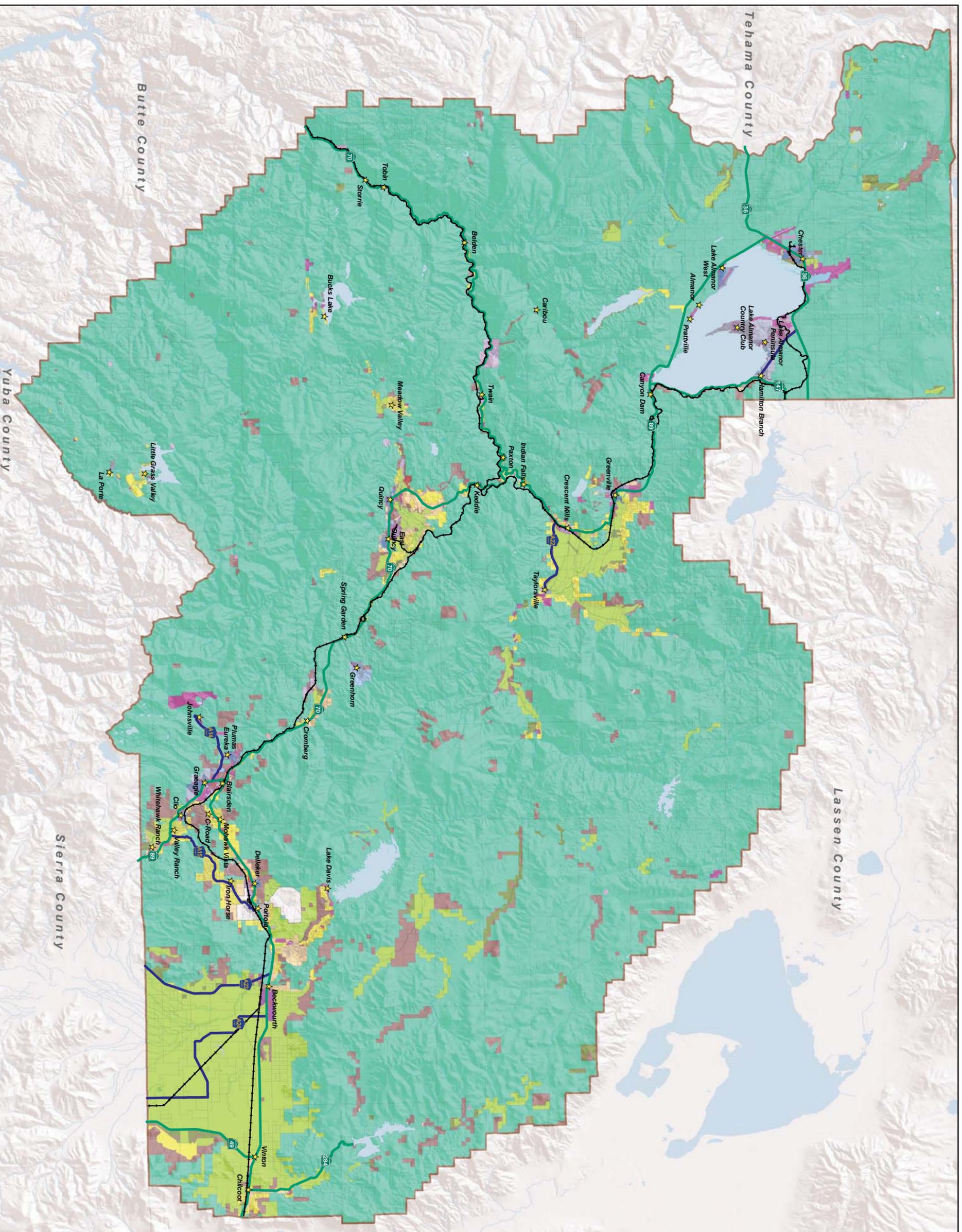
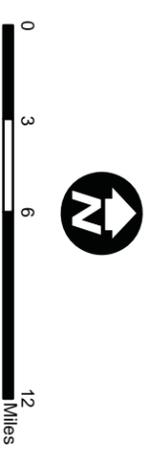


FIGURE 1.

PLUMAS COUNTY
GENERAL PLAN DESIGNATIONS

- Legend**
- Railroad
 - State Highway
 - County Route
 - Lake
 - Plumas County Boundary
 - Parcel
- General Plan Zoning**
- Agricultural Preserve
 - City of Portola
 - Convenience Commercial
 - Core Commercial
 - Important Agriculture
 - Important Timber
 - Limited Industrial
 - Mining
 - Multiple-Family Residential
 - Periphery Commercial
 - Prime Industrial
 - Prime Recreation
 - Rural
 - Secondary Suburban
 - Significant Wetlands
 - Single-Family Residential (2-R)
 - Single-Family Residential (3-R)
 - Single-Family Residential (7-R)
 - Suburban



Element 5 – Economics

The Economic Element, which is the first optional General Plan element, provides policy guidelines for the economic stability and development of the County. Topics of discussion included in this element are policies that support economic development programs, construction of infrastructure, communication and energy facilities, agriculture, forest industries, recreation and tourism.

Element 6 - Public Health and Safety

The primary purpose of the Public Health and Safety Element is to establish policies and programs to protect the County from risks associated with seismic, geologic, flood and wildfire hazards. It is the intent of this section to craft programs and policies that reduce the risk of death, injury, property damage, and the economic and social dislocation related to the above hazards. This element has also included policies that address the goal of sustaining healthy communities.

Element 7 - Conservation and Open Space

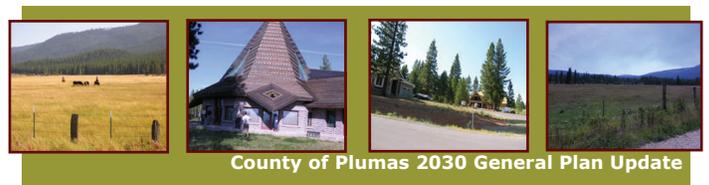
The Conservation Element addresses the conservation, development, and use of natural resources, including water, forests, soils, rivers and mineral deposits. The Open Space Element details plans and measures for the long-range preservation and conservation of open space lands, including open space for the preservation of natural resources, the managed production of resources, outdoor recreation, and public health and safety. As is allowed under State law, the Conservation and Open Space elements are combined to produce element seven. Issues such as agriculture, forestry, and water are typically addressed in Conservation and/or Open Space. Plumas County has elected to address these issues in separate element sections. The Conservation and Open Space Element provides guidance for the conservation, development, and utilization of natural resources and open space land within the County. Specifically included in this section are policies pertaining to biological resources, mineral and soil resources, cultural and historic resources, scenic resources, parks and recreation, trails and bikeways, air quality, climate change, energy conservation and open space resources in general.

Element 8 - Agriculture and Forestry

In addition to the Open Space and Conservation Element, and due to the importance of agricultural and forestlands in Plumas County, an Agriculture and Forestry Element has been prepared to discuss in more detail these two important resources. This element is the second optional element of the Plan. The topics of discussion within the policies include productive use of resource lands, conversion of agriculture and forest lands, promotion of healthy competitive farm, ranch and forestry economies and sustainable food systems, water quality and quantity for agriculture, education and awareness of the importance of agriculture and forestry, support of infrastructure creation and management of greenhouse gas (GHG) emissions.

Element 9 – Water

The third optional element contained in the Plumas County General Plan Update is the Water Element. Plumas County is almost entirely contained within the Feather River Watershed and makes up approximately 72% of the land area of the watershed. The value that good policy and management practices bring to the rest of California through ecosystem services cannot be underestimated. Protecting water quality and quantity for local economic sustainability is also important. The topics discussed in this element include water quality and quantity, watershed management, climate change, public water supplies, agriculture and forestry, recreation, hydropower generation and wastewater and storm water management.



County of Plumas 2030 General Plan Update

Potential Environmental Impacts

The EIR will analyze a broad range of potential environmental impacts associated with implementation of the draft General Plan. Due to the programmatic nature of the General Plan, the level of analysis in the PEIR will be commensurate with the level of detail in the plan itself, which includes a program-level or "first tier" analysis of the Draft General Plan consistent with California Public Resources Code (PRC) Sections 21083.3, 21093, and 21094, and California Code of Regulations (CCR) Sections 15146, 15152 and 15168. In other words, the degree of specificity in the Program EIR will correspond to the degree of specificity involved in the comprehensive General Plan update. The PEIR will focus on the secondary and regional effects that can be expected to follow from adoption of the General Plan update, and will not be as detailed as an EIR on specific development or construction projects that may follow.

The analysis in the Program EIR will compare the existing conditions or baseline setting to potential regional-level impacts within the General Plan planning area expected for each environmental topic area based on implementation of the 2035 General Plan, including build-out of the Plan area by the year 2035. The Program EIR will provide all necessary environmental review, impacts analysis, and mitigation to evaluate the adoption and implementation of the General Plan goals, policies, and implementation programs. The PEIR will also assess the potential impacts of a range of project alternatives. Following the preparation of the Draft PEIR, a Final PEIR will be completed that responds to public and agency comments received on the Draft PEIR. The County Board of Supervisors is expected to consider the certification of the Final PEIR and approval of the 2035 General Plan by Spring 2012. Once the Program EIR is certified, the County will review subsequent projects for consistency with the Program EIR, and prepare appropriate environmental documentation pursuant to CEQA provisions for subsequent projects.

Based on the County's preliminary analysis of the project, the PEIR will evaluate the following topics:

Aesthetics

The project may:

- Have adverse effects on scenic vistas or damage scenic resources.
- Degrade the existing visual character or quality of the County and its surroundings.
- Create a new source of substantial light or glare.

Agriculture/Forestry Resources

The project may:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses.
- Conflict with existing agricultural or forestry uses.

Air Quality/Global Climate Change

The project may:

- Conflict with or obstruct implementation of the applicable air quality plan.
- Result in a net increase of any criteria pollutant for which the project region is non-attainment under the federal or state ambient air quality standard.
- Expose sensitive receptors to substantial pollutant concentrations.
- Create objectionable odors affecting a substantial number of people.
- Result in an increase in greenhouse gas emissions that would contribute to global warming conditions.



Biological Resources

The project may:

- Have a substantial adverse effect on any species identified as a candidate for special or sensitive status in local or regional plans, policies, or regulations, or by the California Dept. of Fish and Game or U.S. Fish and Wildlife Service.
- Have a substantial adverse effect on riparian habitat.
- Have a substantial adverse effect on federally protect wetlands.
- Interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Cultural Resources

The project may:

- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
- Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

Geology, Soils, and Minerals

The project may:

- located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

Hazards and Hazardous Materials

The project may:

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures to a significant

risk of loss, injury, or death involving earthquakes, or upsets due to earthquakes or floods.

Hydrology and Water Quality

The project may:

- Substantially affect groundwater supplies or interfere with groundwater recharge.
- Substantially alter the existing drainage patterns in a manner that could result in substantial erosion or siltation .
- Substantially alter the existing drainage pattern of the site or area in a manner that could result in flooding on or off site.
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
- Place housing within a 100-year flood hazard area.
- Place within a 100-year flood hazard area structures that would impede or redirect flood flows.
- Expose people or structures to a significant risk of loss, injury, or death involving flooding.
- Inundated by seiche, tsunami, or mudflow.

Land Use/Planning

The project may:

- Conflict with an applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating a significant environmental effect.



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Noise

The project may:

- Expose persons to excessive groundborne vibration or groundborne noise levels.
- Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
- Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.
- For a project located within an airport land use plan expose people residing or working in the project area to excessive noise levels.

Population and Housing

The project may:

- Induce substantial population growth in an area, either directly or indirectly.

Public Services/Recreation

The project may:

- Create an increase in demand for new or expanded public facilities and services such as Fire protection, Police protection, Schools, Parks, Recreation Facilities and other public facilities, which may cause potentially significant environmental impacts.

Transportation/Traffic

The Project may:

- Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.
- Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.

Utilities and Service Systems

The project may:

- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects .
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

Cumulative and Growth Inducing Impacts

The EIR will include a separate section that will identify whether the proposed project's impacts for each of the subject areas identified above are cumulatively considerable. "Cumulatively considerable" means that the "incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." The analysis will be based on plans for surrounding jurisdictions and the geographic scope of each environmental topical issue.

The EIR will discuss growth inducing impacts associated with the proposed project.



Alternatives to the Proposed Project

The State CEQA Guidelines (Section 15126.6) provide criteria for the development of alternatives to the proposed 2035 General Plan. These criteria include 1) ability of the alternative to attain most of the basic objectives of the project, 2) potential feasibility of the alternative, and 3) ability of the alternative to avoid or substantially reduce one or more of the significant environmental effects of the project. Section 15126.6 of the State CEQA Guidelines states in part:

"The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making."

The EIR will examine a range of feasible alternatives to the proposed project, including the No-Project Alternative.



To: Honorable the County of Plumas Board of Supervisors, and Planning Commission
From: Todd and Terri (Dabney) Andersen, Headwaters of the upper Feather River Watershed
Subject: "2030 Plumas County General Plan NOP"
Date: 01/11/2012

I would like to start this letter off by reviewing all meeting that Todd Andersen has attended trying to find the truth about our groundwater rights. On or about January 1, 2011 we indicated to the public that we were going to work on our groundwater rights so we could create clean water and jobs to Crescent Mills. By this time the economy turned so bad that we felt that it was our obligation as a resident and citizen of Plumas County. In a Certified Letter send to the Board of Supervisors dated March 28, 2011, stated the progress we had made at that point. Once that Certified letter was mailed and received by Plumas County.

Todd Andersen on or about April 12, 2011 went to the Board of Supervisors office to discuss the issues within this document. (See Attachment) I met with Supervisor Kennedy and discussed our concerns and he eventually sent me to Randy Wilson's office at Plumas County Planning Department. I went into Randy Wilson office with Jim Graham, I stated at that meeting about our plans to build a Water Bottling facility on our property using our groundwater rights.

In this meeting, Mr. Wilson sent Mr. Graham to get the zoning book on my parcel (111-050-010). When Mr. Graham returned to the meeting with the zoning for our parcel, Mr. "Wilson took the folder from Mr. Graham and looked up what our zoning would be for our parcel. The zoning for the above address Secondary Suburban (S-3). Sec 9-2.1602 (B) (1) (2) Uses (S-3). (B) The following uses shall be permitted subject to the issuance of a special use permit. (1) Public Utility Facilities, Public Service Facilities. (2) Home Industries. Mr. Wilson indicated that the bottling facility could be built under the Home Industry's section of the zoning. Both Randy Wilson, Department Head of The Planning Department, or the lead person on the Planning Commission for the Plumas County General Plan or Mr. Graham failed to mention there professional responsibility as a Public Servant of the conflict of interest my plan of a Water Bottling facility on my parcel using my groundwater rights and the project of the Draft General Plan of Plumas County on or about April 12, 2011.

The Board of Supervisors have also known of my plan and did not tell my why there was conflict of interest. All elected Public Servants take an oath of office. Therefore by not notifying us of their Professional Responsibilities and ignoring the Code of Ethics, and/or oath of office.

When I Todd Andersen continued to attend almost all the Board of Supervisors Meetings, eventually Water Rights came before the Board of Supervisors in recognizing water rights in the form of a resolution passed by the Board of Supervisors. I was very vocal in the public discussion in this resolution. See Feather River publishing article about this resolution being passed in 2011 with my name being mention in the article. At that Board meeting knew about my water rights, and when I

asked the Board and Brian Morris, (Flood Control and Water Conservation District Manager) to recognize my water rights as the Headwater of the Upper Feather River Watershed.

He responded by saying "Mr. Andersen's Water Rights fall under the water right holders, the DWR recognizes, and is under DWR's Management. The Board went ahead and passed the resolution, without recognizing our groundwater rights and concerns. This again become a professional responsibility of the Board, and Brian Morris to let us know about the conflict of interest that the County of Plumas had against recognizing the ground water rights to our parcel.

The conflict of interest that the County of Plumas has against 15389 Old Wagon Road (Highway 89), Crescent Mills, CA. and the water rights adjudicated with the above parcel is by recognizing our groundwater right and our decree #1624, dated March 19, 1914. The County of Plumas would then admit that there Integrated Regional Water Management Plan dated 2005 would have knowledge of misleading or false statements within the (IRWM), therefore all grants writing using this document the (IRWM) dated 2005 is misleading or false.

The misleading/false statement in the (IRWM) pg. 64 title is Indian Valley Ground Water Basin. "There is no known information about water quality for this basin. In addition, there is no known groundwater management plan, groundwater ordinances, or basin adjudications associated with this groundwater basin."

Adjudication associated with this groundwater basin is decree # 1624 dated March 19th, 1914, Plumas County Superior Court, Judge, J. O. Moncur. This case went to the District Court of Appeals, the decision from the Third District Court dated December 13th, 1917. This ground water is also in the Indian Creek decree #4185, diversion #123 on the DWR maps dated 1945, and this is a known adjudication associated of ground water within the basin. Also, there has been a plan for the groundwater basin for almost 100 years. The town of Crescent Mills uses this decree #1624, dated March 19, 1914 and decree # 4185 (The Indian Creek Decree), diversion box #123 (DWR) map dated 1945.

In the decree #4185 they list all diversion boxes for the (Indian Creek decree). At this time I would like to go back to an earlier Board of Supervisors Meeting that followed the meeting I had with Randy Wilson, on or about April 12, 2011. I was told by multiple supervisors that I needed to discuss my water rights with Indian Valley Community Service District (IVCSD). I attended the very next month's Board meeting and notified them in the Public Comment period of the (IVCSD) Board Meeting about recognizing my water rights and would like to visit the Water Source for the Town of Crescent Mills. To make a long story short I eventually toured the water source for the town of Crescent Mills with an employee of (IVCSD) his name was Dan, I believe his title was an Assistant to Jessie Lawson the Chief Certified Water Treatment Plant Operator for (IVCSD).

In the December Board of Supervisors Meeting where they discussed and passed the Draft General Plan with Randy Wilson addressing the Board. I was recognized by the Chair to add to the discussion and I addressed the Board and Mr. Wilson about my 5 pages of revision, suggestions, for modification to the Draft General Plan, dated October 14 2011. I was told that my document was not relative or sufficient to change any part of the Draft General Plan. You will find on page 2 of the 5 page

of my document submitted to the Board of Supervisors and the Planning Commission Dated Nov. 4 2011, Second paragraph "Plans and Planning Page 35 of the Draft General Plan dated Oct 14, 2011, my comment or suggestion "All plans should be spelled out complete and made part of the record" That would include on this page of the Draft general plan that would include Integrated Regional Water Management Plan dated 2005, with misleading or false information.

The (NOP) for the Environmental Impact Report Project is being conducted using the Integrated Regional Water Management Plan dated 2005, with misleading or false information. This document and all aspects concerning this error we identified along with future (IRWM) projects/grants should stop immediately until this issue is resolved.

We reserve the right to revise and extend this document.

We both are more hurt than anything else. We Love Plumas County and we love the Community in which we live. We would do anything in our power to improve Crescent Mills, and there for improving Plumas County.

A handwritten signature in black ink, appearing to read "Todd and Terri", followed by the date "4/12/2012". The signature is written in a cursive, flowing style.

Todd and Terri (Dabney) Andersen



Plumas Audubon Society

P. O. Box 3877
Quincy, CA 95971
Harry G. Reeves
530 2831230

January 25, 2012

Randy Wilson, Director
Plumas County Planning Department
555 Main Street,
Quincy, California 95971

RECEIVED

JAN 26 2012

PC Planning + Building

Scoping Comments on the Plumas County General Plan Environmental Impact Report

Dear Mr. Wilson,

Plumas Audubon Society is a local chapter of the National Audubon Society. Plumas Audubon has 226 members. Of these, 160 also belong to the National Audubon Society and 60 are Plumas Audubon chapter-only members. Our members live throughout the county, and will be affected by the land development and socio-economic policies flowing from the General Plan. For the last quarter of a century members of Plumas Audubon, in partnership with other local groups, have strived to protect and improve the environmental integrity and ecosystem function of the region for the benefit of the entire community.

The Administrative Draft Plumas County General Plan, adopted unanimously by the Plumas County Board of Supervisors in November 2011, is effectively designed to provide protection to watershed lands and important wildlife habitat by strongly encouraging residential and commercial development within existing communities and services districts, and by seeking to maintain commercially viable agriculture and to protect private timber lands from other uses. This General Plan is an expression of community preferences and will serve to guide county officials and decision makers for many years. This plan should work to retain and to further improve upon the environmental qualities that make Plumas County a rich and diverse wildlife habitat, a clean and productive watershed, and an aesthetically pleasing place to live, conduct business, and visit.

The California Environmental Quality Act (CEQA) requires that a program Environmental Impact Report (EIR) be completed before the General Plan can be finalized and formally adopted. CEQA directs that the EIR evaluate anticipated environmental impacts of the preferred plan. CEQA further requires that the EIR consider, and evaluate impacts of a reasonable range of alternatives. The Notice of

Preparation has identified 17 subject areas to be evaluated. Environmental impacts of the draft General Plan, as the preferred alternative, and each alternative should consider all of these 17 areas and should particularly take into account beneficial and harmful effects to native wildlife and vegetation, watershed function and quality, and the aesthetic qualities of the Plumas County environment.

The required no-project alternative should clearly describe the consequences of not adopting a revision of the County General Plan. The other most important alternative to look at is a project that permits maximum development opportunities on agricultural or timber lands with minimal restraint.

Sierra Pacific Industries, a large private land owner in Plumas County, has indicated, in a letter to the Planning Department dated November 17, 2011, several policies in the administrative draft General Plan that they ask to have looked at "more critically." SPI's "sixth issue" in that letter provides a pattern for an EIR alternative that would be far less restrictive on land development than the administrative draft General Plan. Analysis of such an alternative would serve to provide an enlightening contrast of impacts. In the analysis the EIR should include focus on fragmentation and reduction of wildlife habitat, as well as social and economic effects of development outside of existing service districts. The EIR should carefully look at costs and other community effects to fire protection, medical and emergency services, and law enforcement, as well as to utilities including water and sewage, garbage collection, power, and communication services. We suspect that analysis of an "SPI alternative" would reveal substantial costs to be borne by the general public in essentially underwriting sprawling residential developments.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Harry G. Reeves", written in a cursive style.

Harry G. Reeves

Plumas Audubon Society



Plumas Audubon Society

P. O. Box 3877
Quincy, CA 95971
Harry G. Reeves
530 2831230

February 7, 2012

Randy Wilson, Director
Plumas County Planning Department
555 Main Street,
Quincy, California 95971

Additional Scoping Comments on the Plumas County General Plan Environmental Impact Report

Dear Mr. Wilson,

In addition to scoping comments to the DEIR for the Plumas County General Plan, sent on January 25, 2012, a further recommendation for the range of alternatives is to evaluate a plan more generally restrictive on development. It should be designed for the purpose of providing optimal wildlife and watershed conditions, less growth outside of established residential, commercial and industrial communities, and to provide stronger protection of economically viable agriculture and timber resources. This alternative should prohibit or severely restrict lot splits on agricultural or timber production land. It is to be expected that such an alternative would be in sharp contrast the less restrictive alternative.

Sincerely yours,

Harry G. Reeves

Plumas Audubon Society

Plumas County General Plan

Recommendations

October 13, 2011

From

***CAL FIRE* Lassen Modoc Plumas Unit**



General Plan Safety Element Recommendations

Wildfire Protection Planning

General Plan References and Incorporates County and Unit Fire Plans:

Recommendation: Identify, reference or create (if necessary) a fire plan for the geographic scope of the General Plan. General Plan (GP) should incorporate the general concepts and standards from any county fire plan, fire protection agency (federal or state) fire plan, and local hazard mitigation plan, including the Lassen Modoc Plumas Unit Fire Plan..

Recommendation: Ensure fire plans incorporated by reference into the GP contain evaluations of fire hazards, assessment of assets at risk, prioritization of hazard mitigation actions, and implementation and monitoring components.

Land Use Planning:

Goals and policies include mitigation of fire hazard of fire hazard for future development.

Recommendation: Establish goals and policies for specific ordinances addressing evacuation and emergency vehicle access; water supplies and fire flow; fuel modification for defensible space; and home addressing and signing.

Recommendation: Develop fire safe development codes used as standards for fire protection for new development in State Responsibility Area (SRA) within the entity's jurisdiction that meet or exceed statewide standards in 14 California Code of Regulations Section 1270 et seq.

Recommendation: Adopt, and have certified by the BOF, local fire safe ordinances which meet or exceed standards in 14 CCR § 1270 for State Responsibility Area.

Disclosure of wildland urban interface hazards including Fire Hazard Severity Zones designations and Communities at Risk designations:

Recommendation: Specify whether the entity has a Very High Fire Hazard Severity Zones (VHFHSZ) designation pursuant GC 51175 and include a map of the zones that clearly indicates any area designated VHFHSZ.

Recommendation: Adopt CAL FIRE recommended Fire Hazard Severity Zones including model ordinances developed by the Office of the State Fire Marshal for establishing VHFHSZ areas.

Recommendation: Identify and disclose information on communities listed as "Communities at Risk".

Recommendation: The Plumas County Wildfire Protection Plan (CWPP) needs to be included into the general plan.

Housing/Structures and Neighborhoods:

Incorporation of current fire safe building codes.

Recommendation: Adopt building codes for new development in State Responsibility Area or incorporated areas with VHFHSZ that are established by the Office of the State Fire Marshal in Title 19 and Title 24 CCR, referred to as the “Wildland Urban Interface Building Codes”.

Identification and actions for substandard fire safe housing and neighborhoods relative to fire hazard area.

Recommendation: Identify and map existing housing structures that do not conform to contemporary fire standards in terms of building materials, perimeter access, and vegetative hazards in VHFHSZ or SRA by fire hazard zone designation.

Recommendation: Identify plans and actions to improve substandard housing structures and neighborhoods. Plans and actions should include structural rehabilitation, occupancy reduction, demolition, reconstruction, and neighborhood – wide fuels hazard reduction projects, community education, and other community based solutions.

Recommendation: Identify plans and actions for existing residential structures and neighborhoods, and particularly substandard residential structures and neighborhoods, to be improved to meet current fire safe ordinances pertaining to access, water flow, signing, and vegetation clearing.

Consideration of occupancy category effects on wildfire protection

Recommendation: Ensure risks to uniquely occupied structures, such as seasonally occupied homes, multiple dwelling structures, or other structures with unique occupancy characteristics, are considered for appropriate and unique wildfire protection needs.

Fire engineering features for structures in VHFHSZ.

Recommendation: Ensure new development proposals contain specific fire protection plans, actions, and codes for fire engineering features for structures in VHFHSZ. Examples include codes requiring automatic sprinklers in VHFHSZ.

Conservation and Open Space/Agriculture and Forestry:

Identification of critical natural resource values relative to fire hazard areas.

Recommendation: Identify critical natural resources and other "open space" values within the geographic scope of the GP. Determine maximum acceptable wildfire size, fire prevention plans, emergency response plans and initial attack suppression success rates for protection of these areas and values.

Inclusion of resource management activities to enhance protection of open space and natural resource values.

Recommendation: Forest management must take into consideration resource values other than sound silvicultural practices. Therefore, the second sentence in the first paragraph headed "Forest Resources" should be revised to read: "Forest management is based on sound silvicultural practices, while giving consideration to the public's need for watershed protection, fisheries and wildlife, aesthetics, and recreational opportunities alike in this and future generations."

Recommendation: CEQA Guidelines (14 CCR 15382) defines "Significant effect on the environment" as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." The removal of trees to transform timberland to a non-timber growing use (conversion) has an effect on the physical environment and should be included as a disturbance to timber resources. Therefore, the first sentence of the fifth paragraph should read: "Disturbances affecting timber resources within the County include wildfires, bark beetles, conversions of timberland to a non-timber land use, and the exacerbating effect of climate change."

Recommendation: The last sentence of the sixth paragraph states that "Given the number of Federal and State regulations affecting the management of forests, an emphasis on providing landowners with assistance in achieving timber management goals is needed."

Professional Foresters Law can be found in Public Resources Code (PRC) 750. PRC 753 defines "Forestry," as the science and practice of managing forested landscapes and the treatment of the forest cover in general, and includes, among other things, the application of scientific knowledge and forestry principles in the fields of fuels management and forest protection, timber growing and utilization, forest inventories, forest economics, forest valuation and finance, and the evaluation and mitigation of impacts from forestry activities on watershed and scenic values, to achieve the purposes of this article. The practice of forestry applies only to those activities undertaken on forested landscapes. The professions specified in Section 772 are not practicing forestry when mitigating or recommending mitigation of impacts from previous forestry activities on related watershed or ecological values within their area of professional expertise or when recommending those mitigations for proposed timber operations. However, public and private foresters are required to be licensed pursuant to this article when making evaluations and determinations of the appropriate overall combination of mitigations of impacts from forestry activities necessary to protect all forest resources.

It is important to note that large timberland ownerships in Plumas County such as Sierra Pacific Industries, Soper Company, and Collins Company, to name a few, are managed by

California Registered Professional Foresters (RPF). Smaller timberland owners typically secure the services of local consulting RPFs. Pursuant to PRC 753 foresters are required to be licensed when making evaluations and determinations of the appropriate overall combination of mitigations of impacts from forestry activities necessary to protect all forest resources, i.e. providing landowners with assistance in achieving timber management goals.

The last sentence of the sixth paragraph is vague and ambiguous. How does Plumas County plan to emphasize the importance of providing landowners with assistance in achieving timber management goals? This sentence should be re-written after much consideration of Professional Foresters Law and its close association with the California Forest Practice Act and Rules. Otherwise, the sentence should be scratched from the text.

Values and Issues

Recommendation: The first sentence in the paragraph headed "Values and Issues" states, "Plumas County's Agriculture and Forestry Element of the General Plan will lead, direct, and guide the sustainable use and management of lands identified as important agriculture and timber resources to the local communities."

What criteria is Plumas County using for deciding what agriculture and timber resource is important? The work 'important' implies that some agriculture and timber resources are unimportant and the General Plan will not lead, direct, and guide the sustainable use and management of lands considered less important. This sentence should be re-written to include all agriculture and timber resource lands in Plumas County.

Recommendation: The work 'date' in the second sentence of the paragraph appears to be a typo and should be deleted from text.

Definitions

Recommendation: The California Forest Practice Act was adopted in 1973, resulting in a comprehensive process where California Department of Forestry and Fire Protection (CAL FIRE) oversees enforcement of California's forest practice regulations. For private lands, CAL FIRE is the lead agency responsible for regulating timber harvesting under the California Forest Practice Rules (FPRs). The purpose of the Forest Practice Rules is to implement the provisions of the Z'berg-Nejedly Forest Practice Act of 1973 in a manner consistent with other laws, including, but not limited to, the Timberland Productivity Act of 1982, the California Environmental Quality Act (CEQA), the Porter Cologne Water Quality Act, and the California Endangered Species Act.

The word "Timberland" as defined in the proposed Plumas County General Plan is "Timberlands include all private lands that are mapped as either Important Timber Resource Areas or Timber Production Zones. These are lands primarily devoted to timber management activities and other compatible uses."

The definition of "Timberland" should be changed so that it is consistent with the definition set forth in Public Resources Code 4526, "Timberland means land, other than land owned by the federal government which is available for, and capable of, growing a crop of trees of any commercial conifer species used to produce lumber and other forest products."

Recommendation: The definition of "Conversion" as set forth in the proposed Plumas County General Plan is "To change from one use type to another. As in: to convert important agricultural lands to secondary suburban residential use."

Pertaining to Timberland Production Zone (TPZ) lands, conversion is considered the rezoning of TPZ lands, but within non-TPZ timberlands conversion is typically the transforming of timberland to a non-timber growing use. Since there is a distinction between converting TPZ and non-TPZ lands the following definition should be added to the Plumas County General Plan definitions:

Timberland Conversion:

- 1) Within non-Timberland Production Zone (TPZ) timberland, transforming timberland to a non-timber growing use through timber operations where future timber harvests will be prevented or infeasible because of land occupancy and activities thereon; or
- 2) Within TPZ lands, the immediate rezoning of TPZ lands, whether timber operations are involved or not.

Recommendation:

Public Resources Code 4527 defines "Timber Operations" as:

- 1) "Timber operations" means the cutting or removal, or both, of timber or other solid wood forest products, from timberlands for commercial purposes.
- 2) "Commercial purposes" includes (A) the cutting or removal of trees that are processed into logs, lumber, or other wood products and offered for sale, barter, exchange, or trade, or (B) the cutting or removal of trees or other forest products during the conversion of timberlands to land uses other than the growing of timber, including, but not limited to, residential or commercial developments, production of other agricultural crops, recreational developments, water development projects, and transportation projects.

The definition of "Timber Operations" should be added to the Plumas County General Plan definitions because it is relevant to forest management in the County. Regardless if on TPZ or non-TPZ land, it is important to recognize that timber operations are conducted when commercial tree species are cut to produce a commercial forest product, or to convert forestland to uses other than growing trees.

Plans and Planning

Recommendation: The heading "Plans and Planning" provides a bulleted list of local and regional plans, programs, and organizations that affect or can contribute to the implementation of the Agriculture and Forestry Element.

Pertaining to timber operations on lands considered timberland, the Forest Practice Rules constitute the minimum standards. Nothing contained in the Forest Practice Rules shall be considered as abrogating the provisions of any ordinance, rule or regulation of any local jurisdiction providing such ordinance, rule regulation or general plan element is equal to or more stringent than these minimum standards. The board of Forestry may certify local ordinances as equaling or <http://www.co.el-dorado.ca.us/building/FSArticle1.htm-top#top> exceeding these regulations when they provide the same practical effect.

That being said, the California Forest Practice Rules (Title 14 California Code of Regulations Chapter 4, 4.5, and 10) should be added to the list that can affect or contribute to the implementation of the Agriculture and Forestry Element.

Goals

Goal Commercial Timber Production Lands

Recommendation: The last sentence under "Implementation Measure" states that "These lands shall be maintained for the purposes of protecting and encouraging the production of timber, other wood products and associated activities." This sentence should be revised to state, "These lands shall be maintained for the purposes of protecting and encouraging the production of timber and other wood products, while giving consideration to the public's need for watershed protection, fisheries and wildlife, aesthetics, and recreational opportunities alike in this and future generations."

Goal Protect Timberlands from Incompatible Uses

Recommendation: Implementation Measure 14III states that "Lands not contained within either of the above categories which are suitable for timber production as shown on the adopted land use maps." This measure should be revised to state, "Lands not contained within either of the above categories that are available for and capable of, growing a crop of commercial tree species used to produce forest products as shown on the adopted land use maps."

Goal Forestland Management Policies and Coordination

Recommendation: The sentence under the above referenced heading states that Plumas County will, "Support fewer, more effective and lower-cost forest management regulations as a strategy to maintain timber and other wood product production as the primary use of forestlands."

The purpose of the Forest Practice Rules is to implement the provisions of the Z'berg-Nejedly Forest Practice Act of 1973 in a manner consistent with other laws, including but not limited to, the Timberland Productivity Act of 1982, the California Environmental Quality Act (CEQA), the Porter Cologne Water Quality Act, and the California Endangered Species Act.

The goal of these laws are to substantially lessen significant adverse impacts on the environment and to achieve long-term, maximum sustained production of forest products, while protecting soil, air, fish and wildlife, and water resources from unreasonable degradation, and which evaluate and make allowance for values relating to range and forage resources, recreation and aesthetics, and regional economic vitality and employment.

The sentence under Goal 8.10.1 is vague and ambiguous for it does not identify the regulations that would be more effective and provide lower forest management costs. Pursuant to Public Resources Code 4516.5 individual counties may recommend that the California Board of Forestry adopt additional rules and regulations for the content of timber harvesting plans and the conduct of timber operations to take account of local needs.

Rules may be adopted if the board finds the recommended rules and regulations are consistent with the intent and purposes of Title 14 California Code of Regulations Chapters 4,4.5 and 10, and necessary to protect the needs and conditions of the county recommending them. The rules and regulations, if adopted by the board, shall apply only to the conduct of timber operations within the recommending county and shall be enforced and implemented by the department in the same manner as other rules and regulations adopted by the board.

The Forest Practice Rules are comprehensive, and after having an understanding of the repercussions of advocating forest practice rule changes, the sentence should be re-written to reflect the goal of environmental protection while allowing for local economic vitality and employment.

Goal Development Application Findings for Timber Resource Lands

Recommendation: The first sentence states that "The County shall evaluate discretionary development applications involving Timber Resource lands, Timber Production Zone (TPZ) lands and adjoining lands." The sentence should be revised to read, "The County shall evaluate discretionary development applications involving timberland, including but not limited to Timber Production Zone (TPZ) land, non-TPZ land, and adjoining lands."

Since 'Timber Resource land' is not defined it is assumed that it is synonymous with timberland as defined in Public Resources Code 4526. Therefore, for the sake of consistency with state law, 'Timber Resource land' should be excluded from text.

Recommendation: Establish goals and policies for incorporating systematic fire protection improvements for open space. Specifics policies should address facilitation of safe fire suppression tactics, standards for adequate access for firefighting, fire mitigation planning with agencies/private landowners managing open space adjacent to the GP area, water sources for fire suppression, and other fire prevention and suppression needs.

Urban forestry plans relative to fire protection:

Circulation and Access:

Adequacy of existing and future transportation system to incorporate fire infrastructure elements.

Recommendation: Establish goals and policies for proposed and existing transportation systems to facilitate fire infrastructure elements such as turnouts, helispots and safety zones.

Adequate access to high hazard wildland/open space areas.

Recommendation: Establish goals and policies should be established to delineate residential evacuation routes and evacuation plans in high or very high fire hazard residential areas.

Defensible Space

Geographic specific fire risk reduction mitigation measures using fuel modification.

Recommendation: Include policies and recommendations that incorporate fire safe buffers and greenbelts as part of the development planning. Ensure that land uses designated near high or very fire hazard severity zones are compatible with wildland fire protection strategies/capabilities.

Fuel Modification around homes.

Recommendation: Establish an ordinance countywide for vegetation fire hazard reduction around structures that meet or exceed the Board of Forestry and Fire Protection's Defensible Space Guidelines, (<http://www.bof.fire.ca.gov/pdfs/Copyof4291.finalguidelines92906.pdf>) for SRA.

Fire suppression defense zones.

Recommendation: Establish goals and policies that create wildfire defense zones for emergency services including fuel breaks, back fire areas, or other staging area that support safe fire suppression activities.

Recommendation: Establish goals and policies that identify structures (or other critical/valuable assets) that have adequate fuel modification or other fire safe features that provide adequate fire fighter safety when tactics call for protection of a specific asset (i.e. which houses are safe to protect).

Public Health and Safety:

Map/description of existing emergency service facilities and areas lacking services:

Recommendation: Include descriptions of emergency services including available equipment, personnel, and maps of facilities.

Recommendation: Initiate studies and analyses to identify appropriate staffing levels, equipment needs and fire flows, commensurate with the current and projected emergency response environment.

Assessment and projection of future emergency service needs:

Recommendation: Ensure new development includes appropriate facilities, equipment, personnel and capacity to assist and support wildfire suppression emergency service needs. Future emergency service needs should be:

Established consistent with state or national standards.

Develop based on criteria for determining suppression resource allocation that includes elements such as identified values and assets at risk, ignition density, vegetation type and condition, as well as local weather and topography.

- Local Agency Formation municipal services reviews for evaluating level of service, response times, equipments condition levels and other relevant emergency service information.
- A dedicated employee, (i.e., County Fire Warden) should handle fire protection issues within the county and administer the development and enforcement of fire protection laws for the county.
- Incorporate Fire Hazard Severity Zone map into the general plan, in order to identify limitations in fire hazard areas.
- Adequacy of training

Recommendation: Establish goals and policies for emergency service training that meets or exceeds state or national standards.

Inter-fire service coordination preparedness/mutual aid and multi-jurisdictional fire service agreements.

Recommendation: Adopt the Standardized Emergency Management Systems for responding to large scale disasters requiring a multi-agency response. Ensure and review mutual aid/automatic aid and other cooperative agreements with adjoining emergency service providers.

Post Fire Safety, Recovery and Maintenance:

The post fire recommendations address an opportunity for the community and landowners to re-evaluate land uses and practices that affect future wildfire hazards and risk. They also provide for immediate post-fire life and safety considerations to mitigate potential losses to life, human assets and critical natural resources.

Reevaluate hazard conditions and provide for future fire safe conditions.

Recommendation: Incorporate goals and policies that provide for reassessment of fire hazards following wildfire events. Adjust fire prevention and suppression needs commensurate for both short and long term fire protection needs.

Recommendation: Develop burn area recovery plans that incorporate strategic fire safe measures developed during the fire suppression, such as access roads, fire lines, safety zones, and fuel breaks, and helispots.

Restore sustainable landscapes and restore functioning ecosystems.

Recommendation: Develop burn area recovery plans, evaluation processes and implementation actions that encourage tree and biomass salvage, reforestation activities, create resilient and sustainable landscapes, and restore functioning ecosystems.

Incorporate wildlife habitat/endangered species consideration.

Recommendation: Establish goals and policies for consideration of wildlife habitat/endangered species into long term fire area recovery and protection plans, including environmental protection agreements such as natural community conservation plans.

Native species reintroduction.

Recommendation: Incorporate native species habitat needs as part of long term fire protection and fire restoration plans.

Evaluation of redevelopment.

Recommendation: In High and Very hazardous area, ensure redevelopment utilizes state of the art fire resistant building and development standards to improve past 'substandard' fire safe conditions.

Long term maintenance of fire hazard reduction mitigation projects.

Recommendation: Provide polices and goals for maintenance of the post-fire-recovery projects, activities, or infrastructure.

Post fire life and safety assessments

Recommendation: Develop frameworks for rapid post-fire assessment and project implementation to minimize flooding, protect water quality, limit sediment flows and reduce other risks on all land ownerships impacted by wildland fire.

Recommendation: Identify flood and landslide vulnerability areas related to post wildfire conditions.

Recommendation: Establish goals and policies that address the intersection of flood/landslide/post fire burn areas into long term public safety protection plans. These should include treatment assessment of fire related flood risk to life, methods to control storm runoff in burn areas, re-vegetation of burn areas, and drainage crossing debris maintenance.

Recommendation: Encourage rapid post-fire assessment, as appropriate, and project implementation to minimize flooding, protect water quality, limit sediment flows and reduce other risks on all land ownerships impacted by wildland fire.

Terrorist and Homeland Security Impacts on Wildfire Protection

These recommendations are included to address fire protection needs related to terrorist acts or other homeland security preparedness and response actions. Both preparedness and incident response can adversely impact fire protection. Adverse effects include substantially decreasing emergency resources' availability, responsiveness and effectiveness by diverting resources, interrupting communications, or restricting emergency access.

Communication channels during incidences

Recommendation: Establish goals and policies consistent with the Governor's Blue Ribbon Fire Commission of 2005 for communications and interoperability. Example goals and policies should address fire personnel capability to communicate effectively across multiple frequency bands and update and expansion of current handheld and mobile radios used on major mutual aid incidents.

Emergency response barriers.

Recommendation: identify goals and policies that address vital access routes that if removed would prevent fire fighter access (bridges, dams, etc). Develop an alternative emergency access plan for these areas.

Prioritizing asset protection from fire with lack of suppression forces

Recommendation: Identify and prioritize protection needs for assets at risk in the absence of response forces.

Recommendation: Establish fire defense strategies (such as fire ignition resistant area) that provide adequate fire protection without dependency on air attack and could serve as survivor safety zones for the public or emergency support personnel.

EDMUND G. BROWN JR.
GOVERNOR

MIKE DAYTON
ACTING SECRETARY



RECEIVED

JAN 20 2012

PC Planning + Building

January 13, 2012

Randy Wilson
County of Plumas
555 Main Street
Quincy CA 95971

RE: Notice of Preparation for the 2030 Plumas County General Plan Update Draft
Environmental Impact Report, SCH # 2012012016

Dear Mr. Wilson:

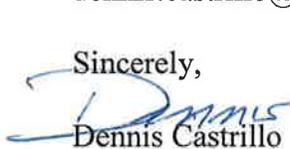
Thank you for the opportunity to comment on the Notice of Preparation for a Draft Environmental Impact Report (DEIR) for the county's general plan update. In preparing the general plan and accompanying DEIR, the county should examine the sections of state planning law that involve potential hazards the county may face. For your information, I have underlined specific sections of state planning law where identification and analysis of hazards are discussed (see Attachment A).

Prior to the release of the draft general plan or within the DEIR, county staff or your consultants should examine each of the requirements in state planning law and determine if there are hazard issues within the community which the general plan should address. A table in the DEIR (or general plan) which identifies these specific issues and where they are addressed in the general plan would be helpful in demonstrating the county has complied with these requirements. If the DEIR determines that state planning law requirements have not been met, it should recommend that these issues be addressed in the general plan as a mitigation measure.

We note that state planning law includes a requirement for consultations with state agencies in regard to information related to hazards. Cal EMA would be happy to share all available information at our disposal to facilitate the county's ability to comply with state planning and environmental laws.

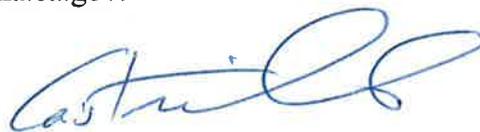
If you have any questions about these comments, please contact me at (916) 845-8270 or dennis.castrillo@calema.ca.gov.

Sincerely,



Dennis Castrillo

Environmental Officer



cc: State Clearinghouse

3650 SCHRIEVER AVENUE • MATHER, CA 95655
RECOVERY BRANCH
(916) 845-8200 [OFFICE] • (916) 845-8385 [FAX]

Attachment A

Hazards and State Planning Law Requirements

General Plan Consistency

65300.5. In construing the provisions of this article, the Legislature intends that the general plan and elements and parts thereof comprise an integrated, internally consistent and compatible statement of policies for the adopting agency.

Seven Mandated Elements

65302. The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principles, standards, and plan proposals.

The plan shall include the following elements:

(a) A land use element that designates the proposed general distribution and general location and extent of the uses of the land for housing, business, industry, open space, including agriculture, natural resources, recreation, and enjoyment of scenic beauty, education, public buildings and grounds, solid and liquid waste disposal facilities, and other categories of public and private uses of land. The location and designation of the extent of the uses of the land for public and private uses shall consider the identification of land and natural resources pursuant to paragraph (3) of subdivision (d). The land use element shall include a statement of the standards of population density and building intensity recommended for the various districts and other territory covered by the plan. The land use element shall identify and annually review those areas covered by the plan that are subject to flooding identified by flood plain mapping prepared by the Federal Emergency Management Agency (FEMA) or the Department of Water Resources.

The land use element shall also do both of the following:

(1) Designate in a land use category that provides for timber production those parcels of real property zoned for timberland production pursuant to the California Timberland Productivity Act of 1982, Chapter 6.7 (commencing with Section 51100) of Part 1 of Division 1 of Title 5.

(2) Consider the impact of new growth on military readiness activities carried out on military bases, installations, and operating and training areas, when proposing zoning ordinances or designating land uses covered by the general plan for land, or other territory adjacent to military facilities, or underlying designated military aviation routes and airspace.

(A) In determining the impact of new growth on military readiness activities, information provided by military facilities shall be considered. Cities and counties shall address military impacts based on information from the military and other sources.

(B) The following definitions govern this paragraph:

(i) "Military readiness activities" mean all of the following:

(I) Training, support, and operations that prepare the men and women of the military for combat.

(II) Operation, maintenance, and security of any military installation.

(III) Testing of military equipment, vehicles, weapons, and sensors for proper operation or suitability for combat use.

(ii) "Military installation" means a base, camp, post, station, yard, center, homeport facility for any ship, or other activity under the jurisdiction of the United States Department of Defense as defined in paragraph (1) of subsection (e) of Section 2687 of Title 10 of the United States Code.

(b) A circulation element consisting of the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, any military airports and ports, and other local public utilities and facilities, all correlated with the land use element of the plan.

(c) A housing element as provided in Article 10.6 (commencing with Section 65580).

(d) (1) A conservation element for the conservation, development, and utilization of natural resources including water and its hydraulic force, forests, soils, rivers and other waters, harbors, fisheries, wildlife, minerals, and other natural resources. The conservation element shall consider the effect of development within the jurisdiction, as described in the land use element, on natural resources located on public lands, including military installations. That portion of the conservation element including waters shall be developed in coordination with any countywide water agency and with all district and city agencies, including flood management, water conservation, or groundwater agencies that have developed, served, controlled, managed, or conserved water of any type for any purpose in the county or city for which the plan is prepared. Coordination shall include the discussion and evaluation of any water supply and demand information described in Section 65352.5, if that information has been submitted by the water agency to the city or county.

(2) The conservation element may also cover all of the following:

(A) The reclamation of land and waters.

(B) Prevention and control of the pollution of streams and other waters.

(C) Regulation of the use of land in stream channels and other areas required for the accomplishment of the conservation plan.

(D) Prevention, control, and correction of the erosion of soils, beaches, and shores.

(E) Protection of watersheds.

(F) The location, quantity and quality of the rock, sand and gravel resources.

(3) Upon the next revision of the housing element on or after January 1, 2009, the conservation element shall identify rivers, creeks, streams, flood corridors, riparian habitats, and land that may accommodate floodwater for purposes of groundwater recharge and stormwater management.

(e) An open-space element as provided in Article 10.5 (commencing with Section 65560).

(f) (1) A noise element which shall identify and appraise noise problems in the community. The noise element shall recognize the guidelines established by the Office of Noise Control in the State Department of Health Care Services and shall analyze and quantify, to the extent practicable, as determined by the legislative body, current and projected noise levels for all of the following sources:

(A) Highways and freeways.

(B) Primary arterials and major local streets.

(C) Passenger and freight on-line railroad operations and ground rapid transit systems.

(D) Commercial, general aviation, heliport, helistop, and military airport operations, aircraft overflights, jet engine test stands, and all other ground facilities and maintenance functions related to airport operation.

(E) Local industrial plants, including, but not limited to, railroad classification yards.

(F) Other ground stationary noise sources, including, but not limited to, military installations, identified by local agencies as contributing to the community noise environment.

(2) Noise contours shall be shown for all of these sources and stated in terms of community noise equivalent level (CNEL) or day-night average level (Ldn). The noise contours shall be prepared on the basis of noise monitoring or following generally accepted noise modeling techniques for the various sources identified in paragraphs (1) to (6), inclusive.

(3) The noise contours shall be used as a guide for establishing a pattern of land uses in the land use element that minimizes the exposure of community residents to excessive noise.

(4) The noise element shall include implementation measures and possible solutions that address existing and foreseeable noise problems, if any. The adopted noise element shall serve as a guideline for compliance with the state's noise insulation standards.

(g) (1) A safety element for the protection of the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to mudslides and landslides; subsidence, liquefaction, and other seismic hazards identified pursuant to Chapter 7.8 (commencing with Section 2690) of Division 2 of the Public Resources Code, and other geologic hazards known to the legislative body; flooding; and wild land and urban fires. The safety element shall include mapping of known seismic and other geologic hazards. It shall also address evacuation routes, military installations, peakload water supply requirements, and minimum road widths and clearances around structures, as those items relate to identified fire and geologic hazards.

(2) The safety element, upon the next revision of the housing element on or after January 1, 2009, shall also do the following:

(A) Identify information regarding flood hazards, including, but not limited to, the following:

(i) Flood hazard zones. As used in this subdivision, "flood hazard zone" means an area subject to flooding that is delineated as either a special hazard area or an area of moderate or minimal hazard on an official flood insurance rate map issued by the Federal Emergency Management Agency. The identification of a flood hazard zone does not imply that areas outside the flood hazard zones or uses permitted within flood hazard zones will be free from flooding or flood damage.

(ii) National Flood Insurance Program maps published by FEMA.

(iii) Information about flood hazards that is available from the United States Army Corps of Engineers.

(iv) Designated floodway maps that are available from the Central Valley Flood Protection Board.

(v) Dam failure inundation maps prepared pursuant to Section 8589.5 that are available from the Office of Emergency Services.

(vi) Awareness Floodplain Mapping Program maps and 200-year flood plain maps that are or may be available from, or accepted by, the Department of Water Resources.

(vii) Maps of levee protection zones.

(viii) Areas subject to inundation in the event of the failure of project or nonproject levees or floodwalls.

(ix) Historical data on flooding, including locally prepared maps of areas that are subject to flooding, areas that are vulnerable to flooding after wildfires, and sites that have been repeatedly damaged by flooding.

(x) Existing and planned development in flood hazard zones, including structures, roads, utilities, and essential public facilities.

(xi) Local, state, and federal agencies with responsibility for flood protection, including special districts and local offices of emergency services.

(B) Establish a set of comprehensive goals, policies, and objectives based on the information identified pursuant to subparagraph (A), for the protection of the community from the unreasonable risks of flooding, including, but not limited to:

(i) Avoiding or minimizing the risks of flooding to new development.
(ii) Evaluating whether new development should be located in flood hazard zones, and identifying construction methods or other methods to minimize damage if new development is located in flood hazard zones.

(iii) Maintaining the structural and operational integrity of essential public facilities during flooding.

(iv) Locating, when feasible, new essential public facilities outside of flood hazard zones, including hospitals and health care facilities, emergency shelters, fire stations, emergency command centers, and emergency communications facilities or identifying construction methods or other methods to minimize damage if these facilities are located in flood hazard zones.

(v) Establishing cooperative working relationships among public agencies with responsibility for flood protection.

(C) Establish a set of feasible implementation measures designed to carry out the goals, policies, and objectives established pursuant to subparagraph (B).

(3) After the initial revision of the safety element pursuant to paragraph (2), upon each revision of the housing element, the planning agency shall review and, if necessary, revise the safety element to identify new information that was not available during the previous revision of the safety element.

(4) Cities and counties that have flood plain management ordinances that have been approved by FEMA that substantially comply with this section, or have substantially equivalent provisions to this subdivision in their general plans, may use that information in the safety element to comply with this subdivision, and shall summarize and incorporate by reference into the safety element the other general plan provisions or the flood plain ordinance, specifically showing how each requirement of this subdivision has been met.

(5) Prior to the periodic review of its general plan and prior to preparing or revising its safety element, each city and county shall consult the California Geological Survey of the Department of Conservation, the Central Valley Flood Protection Board, if the city or county is located within the boundaries of the Sacramento and San Joaquin Drainage District, as set forth in Section 8501 of the Water Code, and the Office of Emergency Services for the purpose of including information known by and available to the department, the office, and the board required by this subdivision.

(6) To the extent that a county's safety element is sufficiently detailed and contains appropriate policies and programs for adoption by a city, a city may adopt that portion of the county's safety element that pertains to the city's planning area in satisfaction of the requirement imposed by this subdivision.

Consistency with Airport Land Use Plans

65302.3. (a) The general plan, and any applicable specific plan prepared pursuant to Article 8 (commencing with Section 65450), shall be consistent with the plan adopted or amended pursuant to Section 21675 of the Public Utilities Code.

Review of Safety Element

65302.5. (a) At least 45 days prior to adoption or amendment of the safety element, each county and city shall submit to the Division of Mines and Geology of the Department of Conservation

one copy of a draft of the safety element or amendment and any technical studies used for developing the safety element. The division may review drafts submitted to it to determine whether they incorporate known seismic and other geologic hazard information, and report its findings to the planning agency within 30 days of receipt of the draft of the safety element or amendment pursuant to this subdivision. The legislative body shall consider the division's findings prior to final adoption of the safety element or amendment unless the division's findings are not available within the above prescribed time limits or unless the division has indicated to the city or county that the division will not review the safety element. If the division's findings are not available within those prescribed time limits, the legislative body may take the division's findings into consideration at the time it considers future amendments to the safety element. Each county and city shall provide the division with a copy of its adopted safety element or amendments. The division may review adopted safety elements or amendments and report its findings. All findings made by the division shall be advisory to the planning agency and legislative body.

(1) The draft element of or draft amendment to the safety element of a county or a city's general plan shall be submitted to the State Board of Forestry and Fire Protection and to every local agency that provides fire protection to territory in the city or county at least 90 days prior to either of the following:

(A) The adoption or amendment to the safety element of its general plan for each county that contains state responsibility areas.

(B) The adoption or amendment to the safety element of its general plan for each city or county that contains a very high fire hazard severity zone as defined pursuant to subdivision (b) of Section 51177.

(2) A county that contains state responsibility areas and a city or county that contains a very high fire hazard severity zone as defined pursuant to subdivision (b) of Section 51177, shall submit for review the safety element of its general plan to the State Board of Forestry and Fire Protection and to every local agency that provides fire protection to territory in the city or county in accordance with the following dates as specified, unless the local government submitted the element within five years prior to that date:

(A) Local governments within the regional jurisdiction of the San Diego Association of Governments: December 31, 2010.

(B) Local governments within the regional jurisdiction of the Southern California Association of Governments: December 31, 2011.

(C) Local governments within the regional jurisdiction of the Association of Bay Area Governments: December 31, 2012.

(D) Local governments within the regional jurisdiction of the Council of Fresno County Governments, the Kern County Council of Governments, and the Sacramento Area Council of Governments: June 30, 2013.

(E) Local governments within the regional jurisdiction of the Association of Monterey Bay Area Governments: December 31, 2014.

(F) All other local governments: December 31, 2015.

(3) The State Board of Forestry and Fire Protection shall, and a local agency may, review the draft or an existing safety element and report its written recommendations to the planning agency within 60 days of its receipt of the draft or existing safety element. The State Board of Forestry and Fire Protection and local agency shall review the draft or existing safety element and may

offer written recommendations for changes to the draft or existing safety element regarding both of the following:

(A) Uses of land and policies in state responsibility areas and very high fire hazard severity zones that will protect life, property, and natural resources from unreasonable risks associated with wildland fires.

(B) Methods and strategies for wildland fire risk reduction and prevention within state responsibility areas and very high hazard severity zones.

(b) Prior to the adoption of its draft element or draft amendment, the board of supervisors of the county or the city council of a city shall consider the recommendations made by the State Board of Forestry and Fire Protection and any local agency that provides fire protection to territory in the city or county. If the board of supervisors or city council determines not to accept all or some of the recommendations, if any, made by the State Board of Forestry and Fire Protection or local agency, the board of supervisors or city council shall communicate in writing to the State Board of Forestry and Fire Protection or to the local agency, its reasons for not accepting the recommendations.

Open Space Plans

65560. (a) "Local open-space plan" is the open-space element of a county or city general plan adopted by the board or council, either as the local open-space plan or as the interim local open-space plan adopted pursuant to Section 65563.

(b) "Open-space land" is any parcel or area of land or water that is essentially unimproved and devoted to an open-space use as defined in this section, and that is designated on a local, regional or state open-space plan as any of the following:

(1) Open space for the preservation of natural resources including, but not limited to, areas required for the preservation of plant and animal life, including habitat for fish and wildlife species; areas required for ecologic and other scientific study purposes; rivers, streams, bays and estuaries; and coastal beaches, lakeshores, banks of rivers and streams, and watershed lands.

(2) Open space used for the managed production of resources, including but not limited to, forest lands, rangeland, agricultural lands and areas of economic importance for the production of food or fiber; areas required for recharge of groundwater basins; bays, estuaries, marshes, rivers and streams which are important for the management of commercial fisheries; and areas containing major mineral deposits, including those in short supply.

(3) Open space for outdoor recreation, including but not limited to, areas of outstanding scenic, historic and cultural value; areas particularly suited for park and recreation purposes, including access to lakeshores, beaches, and rivers and streams; and areas which serve as links between major recreation and open-space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors.

(4) Open space for public health and safety, including, but not limited to, areas which require special management or regulation because of hazardous or special conditions such as earthquake fault zones, unstable soil areas, flood plains, watersheds, areas presenting high fire risks, areas required for the protection of water quality and water reservoirs and areas required for the protection and enhancement of air quality.

CENTRAL VALLEY FLOOD PROTECTION BOARD

3310 El Camino Ave., Rm. 151
SACRAMENTO, CA 95821
(916) 574-0609 FAX: (916) 574-0682
PERMITS: (916) 574-2380 FAX: (916) 574-0682



February 6, 2012

RECEIVED

FEB - 9 2012

PC Planning + Building

Mr. Randy Nelson
Plumas County
555 Main Street
Quincy, California 95971

Subject: 2030 General Plan Update SCH Number: 2012012016 Notice of Preparation of a Draft Environmental Impact Report

Dear Mr. Nelson:

Staff for the Central Valley Flood Protection Board has reviewed the subject document and provides the following comments:

The proposed project is located within the jurisdiction of the Central Valley Flood Protection Board. The Board is required to enforce standards for the construction, maintenance, and protection of adopted flood control plans that will protect public lands from floods. The jurisdiction of the Board includes the Central Valley, including all tributaries and distributaries of the Sacramento River and the San Joaquin River, and designated floodways (Title 23 California Code of Regulations (CCR), Section 2).

A Board permit is required prior to starting the work within the Board's jurisdiction for the following:

- The placement, construction, reconstruction, removal, or abandonment of any landscaping, culvert, bridge, conduit, fence, projection, fill, embankment, building, structure, obstruction, encroachment, excavation, the planting, or removal of vegetation, and any repair or maintenance that involves cutting into the levee (CCR Section 6);
- Existing structures that predate permitting or where it is necessary to establish the conditions normally imposed by permitting. The circumstances include those where responsibility for the encroachment has not been clearly established or ownership and use have been revised (CCR Section 6);
- Vegetation plantings that will require the submission of detailed design drawings; identification of vegetation type; plant and tree names (i.e. common name and scientific name); total number of each type of plant and tree; planting spacing and irrigation method that will be utilized within the project area; a complete vegetative management plan for maintenance to prevent the interference with flood control, levee maintenance, inspection and flood fight procedures (Title 23, California Code of Regulations CCR Section 131).

February 6, 2012
Mr. Randy Nelson
Page 2 of 2

In accordance with CEQA Guidelines Section 15130 "Discussion of Cumulative Impacts. (a) An EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in section 15065(a)(3). Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," the lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable."

Vegetation requirements in accordance with Title 23, Section 131(c) states, "Vegetation must not interfere with the integrity of the adopted plan of flood control, or interfere with maintenance, inspection, and flood fight procedures."

The accumulation and establishment of woody vegetation that is not managed has a negative impact on channel capacity and increases the potential for levee over-topping and flooding. When a channel develops vegetation that then becomes habitat for wildlife, maintenance to initial baseline conditions becomes more difficult, as the removal of vegetative growth is subject to federal and state agency requirements for on-site mitigation within the floodway.

Hydraulic impacts – Hydraulic impacts due to encroachments could impede flows, reroute flood flows, and/or increase sediment accumulation. The Draft EIR should include mitigation measures for channel and levee improvements and maintenance to prevent and/or reduce hydraulic impacts. Off-site mitigation outside of the State Plan of Flood Control should be used when mitigating for vegetation removed within the project location.

The permit application and Title 23 CCR can be found on the Central Valley Flood Protection Board's website at <http://www.cvfpb.ca.gov/>. Contact your local, federal and state agencies, as other permits may apply.

Should you have any further questions, please contact me by phone at (916) 574-0651, or via email at jherota@water.ca.gov.

Sincerely,



James Herota
Staff Environmental Scientist
Floodway Projects Improvement Branch

cc: Governor's Office of Planning and Research
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, California 95814

Fluke, Nancy

From: Wilson, Randy
Sent: Wednesday, February 08, 2012 8:30 AM
To: Coleen Shade; 'Ray Weiss'; Herrin, Becky; Fluke, Nancy
Cc: Mannle, John
Subject: FW: 2030 Plumas County General Plan NOP

From: Len Fernandes [mailto:fernandes@digitalpath.net]
Sent: Wednesday, February 08, 2012 8:25 AM
To: Gavin Feiger; Wilson, Randy
Subject: 2030 Plumas County General Plan NOP

2/8/12

TO: Randy Wilson
CC: Gavin Feiger

SUBJECT: Plumas County General Plan

=====

I'm addressing just one area that I think needs to be looked at in any General County Plan. Non-motorized travel between communities and towns is a key area of prospective growth and planning that needs to be examined and included to help balance the impact of any future development. Specifically, I hope the planning commission explores the following:

- Bikes lanes and/or wider shoulders to make it safer for bicycling. Example - the A-15 paving project included a bike lane. Paving projecting on Highway 70 from Mohawk Vista to Mt Tomba Rd. and from Rocky Point Rd and Highway 70 south have made a much safer corridor for bicycling.
- Investigate the feasibility of wider shoulders and/or bike lanes for any future new roads to compliment infrastructure or any repaving projects.
- Bike corridors promoting travel and routes. Truckee is an outstanding example. This would allow safer travel through communities as well as be an alert to drivers that they may encounter bicyclists on roads.
- Additional bike routes. the "Riverwalk" in Portola is an excellent example as is the bike path in Quincy which crosses town and connects the high school to Feather River College. Additional routes of this type would increase bicycle travel and decrease car travel.
- The Sierras Cascade bicycle route runs right through the heart of Plumas County. This route was used by more than 800 touring cyclists in its first officials season.
www.adventurecycling.org/routes/sierracascades.cfm If the entire route through Plumas County were made safer for bicycling it would attract even more touring cyclists and bring more revenue to Plumas County.

Hope these thoughts help in your planning.

Len Fernandes
Clio, CA
fernandes@digitalpath.net

*** 10-year full-time Plumas County resident**
*** President - Plumas-Sierra Bicycle Club**

2/8/2012

- * Gold Mountain Homeowners Association - Board of Directors
- * Graeagle-Plumas Alliance Advisory Board



-----Original Message-----

From: Jerry Hurley [mailto:jerry.hurley@sbcglobal.net]

Sent: Friday, February 10, 2012 12:54 PM

To: Wilson, Randy

Subject: General Plan EIR

Randy,

in followup to earlier discussions and both written & verbal input, with respect to fire protection, I just want to ensure that the EIR will analyze :

A) Fire protection for for public safety both out of existing fire protection districts and in developments that become inaccessible in usual winter months, due to snow, but are essential to our economy.

B) Alternatives to improve emergency services and fire protection throughout the County, in the Land Use, Circulation, Health & Safety, Agriculture & Water Elements.

C) Fuel modification treatments (fuelbreaks versus landscape) prior to development.

Jerry Hurley

Plumas County FSC Coordinator

Fluke, Nancy

From: Wilson, Randy
Sent: Wednesday, February 08, 2012 8:02 AM
To: Herrin, Becky; Fluke, Nancy; 'Ray Weiss'
Subject: FW: P/C General Plan

From: Larry Fites [mailto:plfites@jps.net]
Sent: Tuesday, February 07, 2012 8:30 PM
To: Wilson, Randy; Coleen Shade
Subject: P/C General Plan

Randy and Coleen,

At the risk of being "too little, too late" - here goes. I started through the draft plan on 9/26/11. I was overwhelmed, poring over/comparing the earlier drafts and my prior comments. I frankly gave up, when I had three other public agency challenges that I had to address. I certainly feel that the 10/14/11 draft is much more comprehensible and easy to follow. Perhaps you might entertain the following late comments as "editorial," and incorporate them as appropriate. Obviously, my long-developed professional/environmental biases have influenced my comments.

pp 22 & 23: What is Plumas Eureka Estates? It should be enumerated. The maps show it as a discrete area. I believe, in context, that it is a master-planned area.

Why is Blairsden not a Community?

Johnsville should be included as a Rural Place. It's in the definitions on pp 33.

pg 41, LU 1.6.2: Should there be a definition of Convenience Commercial; since the term is used in the text?

pg 73, Table 4-1: Include dust/erosion from unsurfaced roads as a factor.

pg 74: Include a definition of "paved" (asphalt concrete or portland cement concrete)/hard-surfaced roads, to be distinguished from treated or untreated aggregate-surfaced roads.

CIR 4.6.1: "environmentally sound practices" should specify hard-surfaced/paved road surfaces.

CIR 4.6.2: "shall review roadway standards" does not timely address the issue of erosion/sedimentation and dust generation. This is a potential significant environmental effect (reference Implementation Measure 10). My unscientific observation at selected locations over the last several decades shows that trip traffic of 100 vehicles per day on unsurfaced roads produces 1/2" of surface degradation per year.

pg 131, PHS 6.3.6: "require long term maintenance of private roads" has no Implementation Measure. This is a significant and needed subject. The Plan should identify how this policy will be implemented and administered/enforced.

PHS 6.3.7: research...county-wide rural fire protection water system. This is a noble thought. My experience tells me that it will may take several decades to achieve. The description might

2/8/2012

include the option of "a coordinated array of individual systems."

General Plan Maps: I got lost on the maps; but, I realize that one must inspect the desktop sets to read and comprehend them.

Mohawk - Mohawk Meadows should probably be identified/recognized. It's comparable in many respects to Valley Ranch, or to Whitehawk Ranch.

Larry

From: Kristi Jamason [mailto:kjamason@gmail.com]
Sent: Wednesday, January 11, 2012 10:12 PM
To: Coleen Shade
Cc: Wilson, Randy; Cindy Noble; Katie Tanner; Bill Powers; Pat Wormington; Kelley Goldsmith
Subject: Re: Joint meeting of the Plumas County Board of Supervisors and Planning Commission

Hi -

I thought I was going to be able to attend tomorrow...we are now in the Bay Area.

Will this meeting be the only opportunity to have input into the alternatives the EIR will consider?

If so... then my request would be that if an alternative is proposed to allow more development (housing, in particular) than the current draft allows, that there also be an alternative studied that is more restrictive - e.g., all lot splits are considered subdivisions, or severely limiting lot splits until 75% (?) of lots currently zoned for housing have houses... I don't know what, exactly, but something that points out the large number of lots currently zoned to allow housing but not built out... the inventory of buildable lots outside the growth boundaries, an alternative that slows/curtails subdivisions.

I think the draft is fine as is. But I understand this process to be a chance to study alternatives. Let's make sure the alternatives balance each other.

Sorry I can't be there -

Kristi

On Mon, Jan 9, 2012 at 5:41 PM, Coleen Shade <cshade@roanderson.com> wrote:

Hello-

I hope you all had terrific holidays!

I was not sure if all of you had already received the County's public notice for the joint meeting of the Plumas County Board of Supervisors and Planning Commission to scope the General Plan update EIR. Just in case the joint meeting will be conducted;

January 12, 2012

10 a.m.

Mineral Building, Plumas County Fairgrounds.

The purpose of this meeting is to solicit input from the public regarding what should be analyzed in the Environmental Impact Statement (EIR) and to assist with developing the range of alternatives that will be analyzed along with the draft General Plan.

The Notice of Preparation (NOP) was submitted today to the California State Clearinghouse for its distribution. This is an important milestone in the process of adopting a General Plan. This initiates the preparation of the EIR and alerts the public and other agencies that a project (in our case, the General Plan Update) is being analyzed for its consistency with CEQA. The NOP solicits comments on what should be included in the analysis (not what should be included in the draft General Plan, you all already did this and the Board of Supervisors and Planning Commission voted to support the draft General Plan as the proposed project) and what other alternatives might be developed. A scoping document will be prepared based on written and on-the-record verbal comments received. From here the alternatives will be developed (most likely 2 or 3 in addition to the proposed draft General Plan) and the potential impacts will be assessed for all alternatives. Based on the environmental analysis (the EIR), there may be adjustments made to the proposed draft general plan.

I do hope you can make it to the meeting on Thursday. I look forward to seeing you.

Best Regards,

Coleen

Coleen Shade, AICP, LEED AP
Principal Planner
direct line **530.600.1662**
cshade@roanderson.com

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Plumas Local Agency Formation Commission
John Benoit, Executive Officer
P.O Box 2694 Granite Bay, California 95746
(530) 283-7069 johnbenoit@surewest.net

February 2, 2012

County of Plumas
Planning Department
555 Main Street
Quincy, CA 95971

Attn: Randy Wilson, Planning Director

SUBJECT: NOP Response for the County of Plumas General Plan EIR

Dear Randy,

Thank you for sending LAFCO a copy of the Notice of Preparation for the EIR the County is undertaking. It is the policy of Plumas LAFCO to actively participate in the development of Environmental Documents where LAFCO may be a Responsible Agency as required in Section 15096 of the CEQA guidelines or in this case, when the County is preparing a General Plan where environmental documents may be used by LAFCO in the foreseeable future as a Lead Agency to satisfy CEQA requirements for Sphere of Influence updates. LAFCO is concerned with the orderly provision of services throughout the County and that the services required for any subsequent development be provided by an established service provider where feasible and that the service provider has and maintains adequate funding for the services to be provided.

As you are aware, LAFCO is in the process of preparing Municipal Service Reviews for all services Countywide and ultimately, Sphere of Influence updates for all agencies subject to LAFCO's jurisdiction in the County. Prior to finalization of future MSRs, LAFCO may need to include new available information contained in the County's Final Environmental Impact Report. If feasible, LAFCO intends to use this EIR for its environmental document where feasible for many of the upcoming Sphere of Influence rather than preparing a new environmental document for each Sphere of Influence update at great expense to the County of Plumas and City of Portola, as LAFCO's funding agencies. Please provide language in the "Purposes and Intent" section of the EIR that LAFCO will be using this EIR for upcoming Sphere of Influence updates for agencies within Plumas County.

Depending upon the ability of the County and independent agencies to provide services (as well as other factors) Sphere of Influence updates to include all the territory in the County's Land Use Diagram map attached to the NOP may not be feasible in the near term sphere horizon. The environmental documentation needs to disclose any potential environmental impacts associated with a larger or updated Sphere of Influence for agencies throughout the County. We realize this could be outside the scope of the present EIR, as to be determined, LAFCO realizes there may be need for supplemental environmental information when LAFCO considers a Sphere of Influence update. Of particular importance to LAFCO is the County and (or) various Agency's ability to provide structural fire, water and wastewater services. These areas should be thoroughly discussed to the extent feasible in the EIR.

In addition to the land use diagram, LAFCO requests a copy of the General Plan Policy Document when the Draft EIR is released for its review. Comments on this NOP do not include any specific comments relating to policies the County may adopt (LAFCO previously provided preliminary comments on draft County General Plan Policies). We believe the environmental impact of proposed new policies needs to be assessed in the environmental document to the extent feasible and must be mitigatable.

A thorough analysis of the impacts upon agricultural lands needs to be placed in the EIR as well as acceptable mitigation for the loss and conversion of agricultural lands. LAFCO's Policies and Procedures (*Adopted by Plumas LAFCO on June 14, 2010*) with respect to the contents of a Sphere of Influence and Municipal Service Reviews are attached to this letter.

LAFCO becomes concerned about the cumulative service impacts subsequent development may have on various local service providers throughout the County. I assume subsequent development will undergo additional environmental review on a project-by-project basis, which may later be used by LAFCO in considering individual future changes of organization.

Thank you for providing LAFCO with the opportunity to comment on the NOP for the County's General Plan. LAFCO would request a hard copy of the DEIR when released as well as the County's General Plan Policy Document and Land Use Diagram as soon as these documents are available.

Sincerely,

A handwritten signature in cursive script that reads "John Benoit".

John Benoit
Executive Officer, Local Agency Formation Commission

SPHERES OF INFLUENCE

General Policies

Plumas LAFCo must adopt a sphere of influence for each city and each district in its jurisdiction, and all Plumas LAFCo actions must be consistent with a sphere plan. Plumas LAFCo must review and update each agency's Sphere of Influence at least once every five years, as necessary. A Sphere of Influence is defined in Section 56425 of the Government Code as "a plan for the probable physical boundary and service area of a local agency or municipality as determined by the commission."

The determination of a Sphere of Influence is one of the most important planning functions given to Local Agency Formation Commissions by the state legislature. The Cortese-Knox-Hertzberg Act is an important tool for "planning and shaping the logical and orderly development and coordination of local governmental agencies so as to advantageously provide for the present and future needs of the county and its communities describes Spheres of Influence." Spheres serve a similar function in LAFCo determinations as general plans do for cities and counties. Consistency with the adopted sphere plan is mandatory, and changes to the plan require careful review.

While Plumas LAFCo encourages the participation and cooperation of the subject agency, the sphere of influence plan is a LAFCo responsibility, and the Commission is the sole authority as to the sufficiency of the documentation and the plan's consistency with law and Plumas LAFCo policy. In determining the sphere of influence of each agency, Plumas LAFCo must consider and prepare a written statement of its determinations with respect to the following four factors as required by Section 56425 (e) of the Cortese-Knox-Hertzberg Act:

- The present and planned land use in the area;
- The present and probable need for public facilities and services in the area;
- The present capacity of public facilities and adequacy of public services provided by the agency; and
- Any social or economic communities of interest in the area that the Commission determines are relevant to the agency.

In order to prepare and update spheres of influence, Plumas LAFCo is required to conduct a review of the municipal services provided in the county, region, sub-region, or other appropriate designated area. The standards, procedures, and policies Plumas LAFCo applies to service reviews are set forth in these policies and procedures. Spheres of influence must be consistent with the findings of the applicable municipal service reviews, and will be modified as necessary.

1. Consistency Requirement. Every sphere of influence plan must be internally consistent, as well as consistent with LAFCO's Policies and Procedures, the state legislature's policy direction to LAFCO, the sphere plans of all other agencies in the area, the Commission's statement of

written determinations with respect to its review of municipal services in the applicable area, and with the long range planning goals for the area.

2. Sphere Boundaries. In establishing the boundaries of a sphere of influence plan for an agency, LAFCO will consider the factors listed in Section 56425 (e) of the Government Code as noted above.
 - a. With respect to the second factor (present and probable need for public facilities and services), LAFCO will not include lands that are unlikely to require the services provided by the agency, for example, lands not designated for development by the applicable General Plan, territory where development is constrained by topographical factors, or areas where the projected and historical growth rates do not indicate a need for service within the timeframe of the sphere plan.
 - b. With respect to the third factor (present capacity of facilities and adequacy of services), LAFCO will not include areas in an agency's sphere of influence, which cannot feasibly be served by the agency within a time frame consistent with the sphere plan.
3. No Concurrent Amendment. Plumas LAFCo will not amend a Sphere of Influence concurrently with its action on an applicants' proposal. Exceptions to this standard will generally be discouraged and will only occur when necessary and practical and at the direction of the Commission upon the recommendation of the Executive Officer.
4. Time Factor. Sphere of Influence amendments and municipal service reviews will ordinarily take longer to process than applications for changes of organization and will generally require information that is more detailed.
5. Updated Plans Encouraged. Agencies are encouraged to keep the supporting documentation for their Municipal Service Reviews and Sphere of Influence plans up to date so that applications for changes of organization or reorganization are able to proceed with minimal delay.
6. Areas of Concern. Plumas LAFCo may designate, in its discretion, a geographic area beyond the Sphere of Influence as an Area of Concern to any local agency.
 - a) An Area of Concern is a geographic area beyond the Sphere of Influence in which land use decisions or other governmental actions of one local agency (the "Acting Agency") impact directly or indirectly upon another local agency ("the Concerned Agency"). For example, approval of a housing project developed to urban densities on septic tanks outside the city limits of a city and its sphere of influence may result in the city being forced subsequently to extend sewer services to the area to deal with septic failures and improve city roads that provide access to the development. The city in such situation would be the Concerned Agency with appropriate reason to request special consideration from the Acting Agency in considering projects adjacent to the City.

- b) Plumas LAFCo will notify any Concerned Agency when the Commission receives notice of a proposal of another agency in the Area of Concern to the Concerned Agency, and will give great weight to its comments.
 - c) If requested, Plumas LAFCo will seek to obtain a Joint Powers Agreement or other commitment between the agencies so that the Acting Agency provides advance notice to the Concerned Agency of any actions, or projects being considered within the area of concern, and commits to considering any comments made by the Concerned Agency.
7. Zero and Minus Spheres. The Commission may adopt a “zero” sphere of influence (encompassing no territory) for an agency when the Commission has determined that the public service functions of the agency are either non-existent, no longer needed, or should be reallocated to some other agency of government. Adoption of a “zero” sphere indicates the agency should ultimately be dissolved. The Commission may initiate dissolution of an agency when it deems such action appropriate. The Commission may adopt a “minus” sphere (excluding territory currently within that agency’s boundaries) when it has determined that territory within the agency’s boundaries is not in need of the agency’s services, or when the agency has no feasible plans to provide efficient and adequate service to the territory in question.

Contents of the Sphere of Influence Plan

- 1. General Requirements. The Sphere of Influence Plans for all cities and special districts within Plumas LAFCo jurisdiction shall contain the following:
 - a. A sphere map and phased plan for annexation of the depicted territory defining the probable boundary of the agency’s service area 20 years hence (the long-term horizon) and identifying a near-term horizon defining the agency’s logical boundary for lands likely to be annexed prior to the next sphere review or update (typically within five years). The phased annexation plan may include specific conditions for particular areas that must be satisfied before annexations may occur.
 - b. Documentation to support the Commission’s determinations regarding the factors stated in §56425(e). Generally this information will be provided in the applicable Municipal Service Review(s), supplemented and updated as necessary to assure the information and analysis satisfy LAFCO policy requirements and are complete, current, and accurate.
- 2. Specific Requirements for City Sphere Plans
 - a. City/County Agreement. When required by G. C. §56425(b), a city and the county shall meet and confer regarding the boundaries of the city’s sphere prior to the Commission’s final determination. If a city and the county have reached agreement regarding the boundaries, development standards, and zoning requirements within a proposed city sphere, the Commission

- shall give great weight to the agreement in the Commission's final determination of the city's sphere.
- b. Parcel Inventory and Absorption Study. The Commission must be able to make a positive determination that the city's sphere is consistent with its historical and expected growth rates, and that the territory within the sphere is likely to be annexed within the 20-year timeframe. The Commission's determination will be based on information provided by the city, including 1) a vacant land inventory, 2) an analysis of the vacant lands to determine their suitability for development, and 3) a market study to determine the absorption rate of the usable vacant lands. If the city is unable to supply such information, LAFCO will make a sphere determination after considering the city's historical growth rates for each land use designation, pertinent city land use and zoning regulations, and the physical characteristics of the property intended to be included in the sphere.
 - c. Spheres for New Cities. The Commission will adopt a Sphere of Influence Plan for a newly incorporated city within a year of the date of incorporation.
3. Specific Requirements for District Sphere Plans
 - a) Appropriate capacity. A district's sphere plan must document that the territory within the district's sphere is likely to require the district's services and that the district has or will have the capacity to serve the area at the appropriate level.
 - b) Multi-service Districts. LAFCO shall adopt a sphere of influence plan for each distinct function or class of service provided by a district. These sphere plans may or may not be coterminous. Each sphere shall establish the nature, location, and extent of the functions or classes of services provided by the district.
 - c) Spheres for New Districts. LAFCO will adopt a Sphere of Influence Plan for a newly formed district within two years of the completion of formation proceedings.

Municipal Service Reviews

In order to establish an appropriate sphere for an agency, LAFCO must have adequate information on present and future service needs in the area and the capabilities of the agency to meet those needs. To this purpose, the Cortese-Knox-Hertzberg Act requires LAFCO to conduct service reviews prior to establishing or updating spheres of influence. A service review is a comprehensive review of provision of specified services within a designated geographic area. Its purpose is to evaluate the provision of services on a regional basis and to recommend actions, when necessary, to promote the efficient provision of those services. The service reviews are intended to help LAFCO, the public and other agencies better understand the public service structure and evaluate options for the provision of efficient and effective public services. LAFCO uses the information and analysis provided by the Municipal Service Review (MSR) to ascertain whether an agency can provide adequate and efficient services to the areas in the agency's sphere within the applicable time frame.

LAFCO will prepare or update the appropriate Municipal Service Reviews prior to or in conjunction with the adoption or update of an agency's sphere of influence plan. In general, LAFCO will conduct such reviews on a service-by-service basis for designated geographic

areas. The Commission will periodically develop and implement a multi-year coordinated schedule for preparing MSRs and updating spheres of influence, in accordance with the legislature's direction to review each agency's sphere of influence every five years and update as necessary and provided for in LAFCO's budget.

- a) General Standards. LAFCO shall prepare Municipal Service Reviews in conformance with the provisions of Government Code §56430. A Municipal Service Review must provide information specific to each agency to support the Commission's written determinations with respect to the following:
 - Growth and population projections for the affected area.
 - Present and planned capacity of public facilities and adequacy of public services, including infrastructure needs or deficiencies.
 - Financial ability of agencies to provide service.
 - Status of, and opportunities for, shared facilities.
 - Accountability for community service needs, including governmental structure and operational efficiencies.
 - Any other matter related to effective or efficient service delivery.
- b) Municipal Service Reviews Must Support Spheres of Influence. In addition to the requirements discussed above, Municipal Service Reviews shall contain information on which the Commission can base its determination of the appropriate sphere of influence for an agency, including:
 - i) Identification of existing land uses and a reasonable projection of land uses, which would occur if services were provided consistent with each agency's sphere of influence plan. This analysis should include maps and explanatory text detailing the following:
 - i) Present designated and actual land uses in the area, improved and unimproved properties, and agricultural and open space lands, as defined by G.C. Sections 56064 and 56059.
 - ii) Proposed future land uses in the area.
 - ii) Discussion of present and probable future needs for public facilities and services in the sphere area. The discussion should include consideration of the need for all types of major facilities, not just those provided by the agency.
 - iii) A determination of the present and future capacity of facilities and adequacy of services the agency provides or has plans to provide. The review must include specific information and analysis of how the agency will meet anticipated growth in demand within its current boundaries and within the area included in its sphere. This information will guide the Commission's designation of appropriate sphere horizons in the Sphere of Influence Plan. The required information should include the following:
 - iii) Maps and explanatory text that indicate the location and capacity of existing and proposed facilities, including a plan for timing and location of new or expanded facilities.
 - iv) An estimate of projected revenue and expense over the sphere horizons, specifically identifying the cost of planned new

facilities or services and projected source(s) of revenue to fund those new facilities or services.

- v) Actual and projected costs of services to consumers in current dollars. A statement of actual and projected allocations of the cost of services between existing and new residents shall be included.
- iv) Identification of any relevant social or economic communities of interest in the area. For example, an area which is completely within one subdivision governed by a single homeowner's association should be noted, in order to avoid unnecessary division of the territory between service agencies.
- c) Uses of the Municipal Service Review. Upon approval of the Municipal Service Review, it will be utilized by LAFCO both in establishing the agency's sphere of influence and in the consideration of all proposals affecting that agency.

Amendments and Updates of Spheres

1. Adoptions and Revisions. Plumas LAFCo will adopt, amend, or update Sphere of Influence Plans after a public hearing and pursuant to the procedures set forth in Section 56430 of the Cortese-Knox-Hertzberg Act. Sphere actions are subject to the provisions of the California Environmental Quality Act. After the initial updates, Sphere of Influence Plans for every city and special district within the county shall be updated as necessary as determined by the Commission. Wherever possible, city sphere updates shall be scheduled to coincide with city general plan updates.
2. Amendments and Updates Defined. Amendments generally involve discrete changes to a sphere of influence map or plan that are proposed by an agency or individual to accommodate a specific proposal. An amendment may or may not involve changes to the Municipal Service Review information.

Updates generally involve a comprehensive review of the entire sphere of influence plan, including the map and applicable Municipal Service Review(s).
3. Amendments Required. An amendment to the sphere of influence plan or municipal services review will be required in the following circumstances:
 - a) To modify a sphere by adding or removing territory
 - b) To move territory from one sphere horizon to another.
 - c) When a district seeks to provide a new or different function or class of service.
 - d) When an agency proposes a significant change in its plans for service that make the current sphere plan impractical.
4. Updates Required. Plumas LAFCo will review the adopted sphere of each agency not less than once every five years, and will update it, as the Commission deems necessary. Prior to completion of a sphere of influence update, LAFCo will request the agency provide updated information for the applicable Municipal Service Review(s) and the

Sphere of Influence Plan. In the absence of adequate information from the agency, the Commission will complete the sphere update by identifying the territories that currently receive the agency's services and excluding unserved territories from the sphere.

5. General Requirements. Plumas LAFCo will generally treat an update or a proposed amendment to an agency's Sphere of Influence similarly to an application for approval of a Sphere of Influence. Each of the following sets of policies apply to amendments to and updates of Spheres of Influence:

- a) General policies.
- b) Specific policies and standards for Spheres of Influence and for Updates and Amendments thereto.

LAFCo will not approve a sphere plan that would result in a sphere that is inconsistent with other LAFCo policies or standards unless a specific finding is made.

6. Precedence of Amendments over Annexations. Sphere of Influence amendments shall precede the Commission's consideration of proposals for change of organization or reorganization.
7. Treatment of Amendment under Sphere Horizons. Plumas LAFCo will not place territory in an agency's near term sphere horizon unless the agency can show an immediate need for service by clear and convincing evidence.
8. Demonstrated Need Required. An applicant for amendment to a Sphere of Influence must demonstrate a projected need or (in the case of reduction of the sphere) lack of need for or inability to provide service.
9. Prime Agricultural and Open Space Land. Amendment proposals involving Sphere expansion which contain prime agricultural or open space land will not be approved by Plumas LAFCo if there is sufficient alternative land available for annexation within the existing Sphere of Influence.

Districts and services which are not growth-inducing

The Commission may prepare abbreviated Municipal Service Reviews and Sphere of Influence Updates for agencies not providing growth-inducing services and districts providing non-growth inducing services, and where appropriate determine Sphere of Influence actions to be exempt from the provisions of the California Environmental Quality Act.

Non-growth-inducing services are defined as all public services except water conveyance, treatment, extraction and use of ground and (or) surface water for domestic services or to facilitate urban development; and domestic wastewater collection, treatment and disposal to facilitate urban development; and fire protection and road construction and maintenance services. Districts providing non-growth inducing services normally would serve finite geographical areas, surrounded by public lands, provide limited specified services to residents or landowners, have coterminous district/sphere of influence boundaries and are not generally or routinely considered for expansion through annexations or sphere amendments for the purpose of providing services for existing or future urban development.

Sphere of Influence Plan reviews and affirmations for districts providing non-growth inducing services would normally not generate environmental impacts that would make them subject to heightened level of review California Environmental Quality Act (CEQA), namely a Negative Declaration or Environmental Impact Report. Pursuant to CEQA Guideline Section 15320 the following may be applied, as appropriate. This section provides for an exemption (class 20) where changes in organization or reorganization of local governmental agencies (i.e. in the case of a Sphere of Influence for districts providing non-growth inducing services) where the changes do not change the geographical area in which previously existing powers are exercised. This exemption may also be applicable where the changes will not result in any substantive changes to the functions, operations or purposes of the districts; are not predicated on, or will result in, any land use changes that may be subject to CEQA review; and will not cause any reasonable foreseeable environmental consequences in that the Sphere of Influence affirmation will not directly create or cause any significant land use changes or other actions that could be detrimental to the environment.

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax



January 17, 2012

RECEIVED

JAN 20 2012

PC Planning + Building

Randy Wilson
Plumas County
555 Main Street
Quincy, CA 95971

RE: SCH# 2012012016 2030 General Plan Update; Plumas County.

Dear Mr. Wilson:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check. **USGS 7.5 minute quadrangle name, township, range and section required.**
 - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached.**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez
Program Analyst
(916) 653-4040

cc: State Clearinghouse

Native American Contact List

Plumas County
January 17, 2012

Greenville Rancheria of Maidu Indians
Kyle Self, Chairperson
PO Box 279
Greenville, CA 95947
kself@greenvillerrancheria.com
(530) 284-7990
(530) 284-6612 - Fax

Maidu

Maidu Cultural and Development Group
Lorena Gorbet
PO Box 426
Greenville, CA 95947
(530) 284-1601

Maidu

Maidu Nation
Clara LeCompte
P.O Box 204
Susanville, CA 96130

Maidu

T si-Akim Maidu
Eileen Moon, Vice Chairperson
1239 East Main St.
Grass Valley, CA 95945
(530) 477-0711

Maidu

Susanville Indian Rancheria
Stacy Dixon, Chairperson
745 Joaquin Street
Susanville, CA 96130
sirtribalchair@citlink.net
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(530) 257-7986 - Fax

Paiute
Maidu
Pit River
Washoe

Susanville Indian Rancheria
Melany Johnson, Cultural Resources Technician
745 Joaquin Street
Susanville, CA 96130
cultural@sir-nsn.gov
(530) 251-5633
(530) 251-5635 Fax

Paiute
Maidu
Pit River
Washoe

Plumas County Indians, Inc.
Chairperson
Box 102
Taylorville, CA 95983
(530) 284-6427

Maidu

Washoe Tribe of Nevada and California
Waldo Walker, Chairperson
919 Highway 395 South
Gardnerville, NV 89410
waldo.walker@washoetribe.
775-265-4191
775-265-6240 Fax

Washoe

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2012012016 2030 General Plan Update; Plumas County.

Native American Contact List

Plumas County
January 17, 2012

Beverly Ogle
29855 Plum Creek Road
Paynes Creek , CA 96075
(530) 597-2070

Maidu
Pit River - Atsugewi

Enterprise Rancheria of Maidu Indians
Glenda Nelson, Chairperson
2133 Monta Vista Ave
Oroville , CA 95966
eranch@cncnet.com
(530) 532-9214
(530) 532-1768 FAX

Maidu

Washoe Tribe of Nevada and California THPO
Darrel Cruz, Cultural Resources Coordinator
919 Highway 395 South
Gardnerville , NV 89410
darrel.cruz@washoetribe.
(775) 265-4191 ext 1212
(775) 546-3421 - cell
(775) 265-2254 FAX

Washoe

T'Si-akim Maidu
Grayson Coney, Cultural Director
P.O. Box 1316
Colfax , CA 95713
akimmaidu@att.net
(530) 383-7234

Maidu

Tasmam Koyom
Fred Mankins, President
PO Box 363
Gerber , CA 96035

Maidu

Enterprise Rancheria of Maidu Indians
Art Angle, Vice Chairperson
3690 Olive Hwy
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(530) 532-9214
(530) 532-1768 FAX

Maidu

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This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2012012016 2030 General Plan Update; Plumas County.

From: Wilson, Randy
Sent: Tuesday, January 17, 2012 8:10 AM
To: Fluke, Nancy; Herrin, Becky; Coleen Shade; 'Ray Weiss'
Subject: FW: Edits and suggested wording for Draft General Plan
FYI there is another email.

From: William Powers [mailto:smilingirisheyes1@yahoo.com]
Sent: Sunday, January 15, 2012 7:31 PM
To: Wilson, Randy
Subject: Edits and suggested wording for Draft General Plan

Hi Randy,

I have a slow start on re-reading the draft plan. Here are my thoughts on a few pages. Nice work, keeping everyone working together!

Cheers,

Bill Powers

P.34 --Area of Concern Minor edit. delete "on" and insert "a"

Under Compatible uses: is that an example, or basis for the definition?

If former; add e.g. If latter; we need broader definitions to cover all compatible uses.

Community: add "and current infrastructure not designed for extensive expansion in its present capacities."

Density Transfer: add "difficult infrastructure developmen or maintenance"

Town: just a question: What is Graeagle under these definitions?

P.40

1.1.4 Delete "to be developed" and add "or" after General Plan in the sentence

Have to jump to another area of my life. I'll get to more later.

Thanks,

Bill

From: Wilson, Randy
Sent: Tuesday, January 17, 2012 8:31 AM
To: Herrin, Becky; Fluke, Nancy; Coleen Shade; 'Ray Weiss'
Subject: FW: P 220
FYI

From: William Powers [mailto:smilingirisheyes1@yahoo.com]
Sent: Monday, January 16, 2012 11:21 AM
To: Wilson, Randy
Subject: P 220

Hi Randy,

Under 9.2.4, should it include wildland activities? I didn't see thinning practices addressed specifically in the water element and this would be a good place to put it. It could read, "Wildfire, Forest Practices, and Water Quality Controls," then in the text, just change "wildfire" to "land." Just a thought. It would read:

The County shall, in cooperation with land management agencies, such as Cal Fire, United States Forest Service, and local fire protection agencies, along with local fuels reduction efforts such as Fire Safe Council projects, develop a variety of land-use planning, site design and vegetation management techniques to reduce the risk of wildfires and encourage prevention activities. This risk reduction shall also include post-fire erosion, sedimentation and water-quality mitigation.

Bill

Dear Supervisors

VISION FOR PLUMAS COUNTY
Position on Issues for the Proposed General Plan
January 19, 2012

As a former member of a Business Alliance; I have crafted this Vision for Plumas County: My position on Issues for the Proposed General Plan are not as a response to any specific document but rather as a source of more general recommendations I suggest. The goal of this paper is to offer a vision based on the yet-to-be released Plumas General Plan. It is my firm belief that the public offer the county at least a vision for growth in this area, so that we are not disenfranchised from efforts to plan for growth – to avoid a course that would have disastrous results. Your local businesses and active trade organizations have access to important statistical data, resource materials and expertise to provide timely information on fundamental land-use issues. They can offer your county valuable data, as you compile their concerns and possible solutions, and help as a means of educating the public about basic General Plan issues.

GENERAL COMMENTS

I encourage local planners, elected and appointed officials and the public to THINK LONG-TERM regarding the General Plan planning process. The document should be concise, comprehensible and user-friendly. It should offer a vision that planners, public agencies, business people, developers and the public can strive to make a reality. It should offer a clear view of how this county will look in 20-50 years. It should plan for all sectors of economic expansion and growth projections in order to avoid future gridlock and a shortage of necessary infrastructure. Below are some crucial facts that I believe must be contained in the final product in order for the document to be useful and successful:

- Keep in mind Plumas County's varied often-hilly and sloped terrain when setting policies. This will insure a workable product as a result. *(For example: biking to work from the rural, low-density areas of the community is not realistic – though it may be a worthy goal for the City of Portola or Quincy.)*
- Private property rights are an important component of any county's customs and culture, and the source of much of the area's economic prosperity. Existing property owners' right to use their land should be protected.
- The General Plan should identify state and federal policies and programs that have been agreed to – to date - that could impact General Plan policies and use

of private property. *(For example: Elected officials may have agreed to provide land for protection of plant and species protection. These agreements should be acknowledged so the public is aware of how they will impact the county's future land-use plans.)*

- The General Plan should be incentive based – not punitive.
- A permanent and secure source of funding should be identified for continuing maintenance of existing government-controlled lands prior to including additional lands for government protection.

WATER

The following general points are positions the County should take regarding water in Plumas County:

- The General Plan (GP) should contain water policies that respond to the needs generated by realistic land-use planning, and should not be used as a means of controlling growth in the county.
- The GP should reference prior contractual agreements and federal and state Decisions that have cited specific protection of Plumes' county-of-origin water rights for its own use.
- The GP should incorporate a drought-preparedness policy for the county that minimizes the negative effects of drought on local citizens, business, agriculture and tourism.
- The GP should identify major sites that have potential as future water storage sites and drought protection based on previously conducted studies if there are any.
- The GP policies should encourage development of local water supplies for local use, sale and power generation that could benefit local residents.
- The GP should encourage water conservation and provide incentives for commercial and residential projects to use recycled water for landscape irrigation.
- The GP should protect lands identified in county water, wastewater and recycled water master plans, as needed, for facilities to be constructed in the future to meet the requirements of the GP. This would include land designated for open or closed storage reservoirs, treatment plants and conveyance systems.

TRANSPORTATION/CIRCULATION

Regarding transportation in Plumas County:

- If a Policy has been established that holds new development responsible for mitigating its impacts on the county's transportation system identify which funding mechanisms are in place. The county is responsible for funding existing deficiencies attributable to existing residents. The GP should identify specific funding sources for the county's responsibilities for maintenance of county roads to identified levels of service (LOS).
- The General Plan (GP) should identify all projected major roadways, including alternative routes to reach Reno.
- The GP should identify long-term solutions and should include policies that support expansion of Highway 70, in order to accommodate additional projected commuter and tourist traffic. *(For example: policies should be identified that would be triggered by specific LOS thresholds.)*
- The GP should include a policy to investigate additional multi-lane routes into the Washoe valley region, including the expansion of Highway 70 to 4 or even 8 lanes, in order to accommodate growth and job projections and to avoid gridlock to the region's major metropolitan area.
- The GP should identify future light rail corridors to Reno.

AGRICULTURE

Planners should recognize the importance of a strong agricultural industry to Plumas County's economic well being as well as to its customs and cultural components. We also recognize that agricultural needs can be a source of conflict with other land uses - such as housing (refer to Housing comments below). You might want to acknowledge the following important points: Plumas County's gross crop value in recent years has been around fifty million dollars or more; Agriculture provides citizens with alternative lifestyles to urban living; Agriculture encourages and promotes a strong tourism industry; Agricultural lands provide much valued open space for local citizens and tourists to enjoy. Most importantly, the local agricultural industry contributes to California's ability to feed much of the world's population.

You might envision a community where abundant agricultural lands are bordered by a variety of forms of open space (refer to Open Space comments below) and/or large residential parcels that would not be negatively affected by agricultural activities such as pesticide use and field dust. These larger-parcel residential areas could then be bordered by higher density residential uses – that would accommodate a variety of housing sizes and costs.

The following points identify some key areas that we believe are necessary in the Plumas County General Plan.

- It should encourage the protection of prime agricultural soils as defined by the Agricultural Commission and Farm Bureau through the inclusion of incentive based policies.
- Support the protection of private property rights for all landowners and cautions against the incorporation of GP policies that would eliminate agricultural property owners right to use their property and make a living from their land.
- The GP should consider the permanent and temporary housing needs of local and migrant farm workers.
- It should support all disciplines within the agricultural community, from raising crops, to ranching and logging. I believe the GP should include positive incentives that take advantage of Plumas County's abundance of all these uses.

OPEN SPACE

The following general points are my position regarding open space in Plumas County:

- That open space can consist of any of the following: wilderness areas, national or state parks, BLM lands, land protected under the Williamson Act, land designated as "prime agricultural soils", neighborhood parks, golf courses, range lands, grazing land, conservation easements and watershed corridors. The General Plan (GP) should reflect these areas as open space in its future vision for the county.
- The GP should recognize that over one-half of Plumas County is already protected as National Forest and state protected lands.
- The GP should oppose more federal/state designated wilderness areas within Plumas County.

HOUSING

The following positions are the result of statistical data, research and the experience of many varied professionals.

- The General Plan (GP) should identify affordable housing locations *withineach community* in Plumas County.
- The General Plan (GP) should identify affordable senior housing policies for *each community* within Plumas County.
- The GP should identify model projects for often-controversial high-density development to encourage acceptance of affordable housing.
- The GP should avoid over-regulating policies on housing design, size and type that increase costs of homes to consumers.
- The GP should establish policies/sources of new funding for affordable housing.
- The GP should oppose inclusionary zoning policies forPlumas County.
- The GP should encourage reconsideration of the General Plan’s definition of “high density” currently set at a maximum of 5 units per acre. Statistics show that to meet housing needs of seniors, first-time buyers, and those earning the local pay scale for public servants such as law enforcement and teachers, “high” density should be defined as 6-8 units per acre.
- The GP should recognize that for the most part there are no more large parcels available for development and the GP should consider land-use planning and funding resources with this fundamental fact in mind.
- The GP should oppose the inclusion of a mandatory “Universal Design” concept due to negative impacts on the cost of new homes with limited benefits. To assure the availability of affordable housing, GP policies should encourage flexible design.
- To aid in providing affordable housing the GP should include tax deferral policies for impact fees. The deferred amount could be recorded/assumed with sale of the property to protect the county’s interests.
- A GP design would be more productive if it gave builders positive incentives instead of negative mandates to encourage the type of housing needed in the county .
- The GP should have flexible zoning to meet the areas housing needs. For example: allowing residential living units above commercial/retail shops will provide affordable housing, will deter crime by avoiding the deserted-after-dark syndrome that plagues many commercial areas.

ECONOMIC DEVELOPMENT

I would take the following position on economic development issues in Plumas County:

- I would encourage the GP to balance “desires” with projected costs for implementing its policies.
- The GP should identify a source of revenue for all programs and policies it mandates.
- A main goal of the new General Plan should be to increase and retain all locally based employers.
- The GP should adopt/identify enterprise zones (which consist of federal rebate money based on number of employees/jobs created) and redevelopment areas - such as what has taken place in Lake Tahoe.
- It is necessary to establish policies aimed at correcting the imbalance between the cost-of-living and the cost-of-housing in Plumas County.
- The GP needs to designate and protect adequate land for industrial uses, as a means of providing high-paying jobs and attempting to balance out the county's income-to-housing-ratio imbalance.

I believe that this paper has merely scratched the surface of some issues. Again, I offer these comments as the result of past expertise and experience in a variety of areas, but also as an attempt to introduce some vision into the general plan planning process. Your businesses can and should add comments on the Draft General Plan and Environmental Impact Report upon their release.

Dr. W. Trent Saxton DC
7854 Buck Brush Dr.
Lake Davis
832-4065

Memorandum

To: Plumas County General Plan Coalition (sort-of coalition)

From: Gavin Feiger and Craig K. Breon

Date: February 6, 2012

Re: Suggestions for Scoping Comments on GP EIR

This memo provides some thoughts for those of you who would like to submit EIR scoping comments to the County. Please note the comments are due this Wednesday, Feb 8.

Scoping comments can be important because they provide the chance to make sure the environmental documents address the issues and contains some of the ideas that you want to be in there. Your audience here is not the Supervisors or Planning Commission, but the planning department and the consultants who will draft most of the EIR (often largely by cutting and pasting from past EIRs). Thus, there's no need to make policy arguments (e.g. "I like Alternative A because..."). Instead, you can ask questions or suggest areas for exploration (e.g. "Please study whether Alternative A might lead to increasing forest fires and resulting property damage."). Also, putting in a comment here does not commit you to anything. For example, if you have an alternate growth policy that you would like them to look at, that does not necessarily mean that you endorse that policy—simply that you would like it explored.

Below, we suggest some topics to comment on and provide some specific guidance. Of course the choice is your—submit all, some, or none of these, and add some of your own. We really do hope you take advantage of this resource and other information/ideas you have to submit informed comments that will shape growth and land use until 2030.

Basic Instructions for Commenting

- **Comments are due this Wednesday, February 8th and can be submitted electronically by emailing randywilson@countyofplumas.com and include "2030 Plumas County General Plan NOP" in the subject line.**
- It can be helpful to state your qualifications and motivation. For example, if you have worked in a planning or environmental role, if you are a long-time Plumas resident, if you have seen other general plans, etc.
- If you have or will be providing comments, please **"reply all"** to this email **to let the others know what comment(s) you submitted or intend to submit.** This might help you avoid saying too much of the same thing. On the other hand, if multiple people ask, it might help get an additional alternative considered in the EIR or get the staff to focus on certain issues.
- As always, please let us know if you have any questions or need help in phrasing an idea.
- The reality is that late comments are often still considered at this CEQA stage, so if you want to submit comments but can't do it by Wednesday, just send a note to Randy Wilson saying this and most likely they will give you some extra days.

Comment Suggestions and Guidance

- **The range of alternatives to be considered in the draft EIR—CEQA calls for a “reasonable range” of alternatives to be evaluated.**
 - During the scoping meeting held in January, there were suggestions to look at more development-intensive alternatives. The idea may have been to show how damaging unrestricted development could be. This approach may be valid, but we are concerned that negotiations tend to end somewhere in the middle, so this approach might also swing the preferred alternative towards more development.
 - SPI has submitted a letter asking for certain concepts to be considered as an alternative to the preferred alternative, and this has been agreed to, so we will both want to watch over that alternative closely and perhaps counter it in advance with another alternative of your own.
 - **Suggested comment:** Ask for a very development-constrained alternative, which will probably end up showing lessened environmental impacts in the DEIR and ideally swing the preferred alternative towards more concentrated development in the current planning areas. In particular, this alternative could strictly limit or even eliminate lot splits on lands zoned for timber production or agriculture. The Sierra County General Plan has some provisions to consider, and noting that a neighboring county has these provisions would imply that they could be feasible for Plumas County as well. Specifically, the Sierra County General Plan states in places:

Lot splits

“As a result, the Land Use Diagrams designate the Sierra Valley floor and other agricultural areas Agricultural with no new lot splits allowed.” [GP pp. 1-16. Note: Sierra considers timber production as part of agriculture.]

Lot splits

“The Land Use Diagrams for each community were refined after input at public workshops in each community. The Community Core Areas include more intense land uses (such as Commercial) and residential densities from Multiple Unit (8-12 units/acre) up to 10 acre lots. Community Influence Areas surround the Community Cores when appropriate and provide for larger lot sizes (over 10 acres to 40 acres) which require a lesser level of public facilities but which would not be appropriate in resource production and protection areas. Outside this area, no new lot splits would be allowed. The intent is to:

- Provide ample area for growth projected with the Community
- Core and Community Influence Areas
- Provide for the most cost effective provision of public facilities and services
- Avoid environmental constraints
- Build on existing communities and encourage compact, non-sprawling communities.” [Sierra County GP p. 1-26]

Sierra County does not allow lot splits in either their TPZ or General Forest zoning districts. Suggesting that Plumas consider the same in their EIR would provide a good comparison with what SPI has asked to be evaluated.

- **The definition of the term "development."**

- “Development” is used in a variety of ways throughout the General Plan, which could lead to some confusion. For example:
 - Under “Definitions,” “The term ‘development’ in the General Plan means lot creation, condominium projects, or utilization of commercial, multi-family residential or industrial parcels” (p. 35).
 - Under the “Economics” element, “The Economics Element of the Plumas County General Plan is intended to articulate a set of long-range goals for economic development within the County and to provide a framework of policies that the County will enact in order to help achieve...” (p. 93)
 - Suggested comment: Encourage the preparers to more consistently define and use the term “development” in order to differentiate between lot creation, economic growth and building construction.
- **Timber Production Zones (TPZ) and possible designation changes-** implications for both development and land values.
 - TPZ vs General Forest designations – TPZ allows one residential unit per 160 acres and cannot be divided into lots smaller than 40 acres. General Forest zones allow one residential unit, or two if the parcel is 80 acres or more, and cannot be divided into lots of less than 40 acres. General Forest also allows a wider range of uses on the land.
 - Even if SPI chose not to try to sell off or develop additional parcels, changes in zoning or allowable units on TPZ parcels could increase land values, making it harder for land conservation organizations to acquire forested lands in the area or making the purchase of carbon credits (a relatively new way to protect forests) more expensive.
 - Suggested Comment: Ask the DEIR to evaluate the *cumulative* effects of rezoning TPZ designated lands to other designations, such as General Forest. Would this allow wider land uses, including residential and commercial development, affect air quality, water quality, traffic, emergency service response, noise, and the traditional uses that create long-term jobs and contribute to Plumas County’s rural character?
 - Suggested Comment: Would allowing more lot splits in the TPZ zone or rezoning to General Forest mean that existing timber operations would be less economically viable, more difficult to manage, and/or have more conflicts with neighbors? Larger operations are generally easier to manage economically, and when even a few lots are split off in an area, it can lead to a less sustainable operation and, then, a cascade of more lot formation and the associated environmental impacts.
 - Suggested Comment: Ask whether changes in zoning or allowable units and uses on TPZ lands would increase land values and thus interfere with any established plans in the region to acquire additional lands for conservation. This may seem obscure, but the CEQA guidelines do recognize interference with an established land conservation plan as a potentially significant impact on the environment.
- **Lot splits of less than 5 lots** - concern regarding potential for this exemption to be significant and how to control it within the GP or EIR. The current draft of the GP would allow lot splits of less than 5 lots

in certain zones to occur easily. While each of such splits might have negligible impact, their cumulative effect could be considerable.

- The population in Plumas County is projected to grow at 1% annually for the foreseeable future. This could mean as many as 100 new residences per year. If built within the areas planned for growth, environmental impacts will generally be lessened. If lot splits are allowed at levels currently supported by the General Plan outside the planning areas, this could be a serious strain on emergency services, economic sustainability, air quality, traffic, noise, and open space.
- The adjacent Sierra County General Plan does not allow lots splits in Timber Production Zone (TPZ), General Forest, Agriculture or Grazing land or outside of the equivalent to Plumas' planning areas. This suggests that restricting lot splits is a reasonable and feasible way to reduce impacts from future development.
- Suggested comment: Ask the EIR consultants to evaluate and quantify the number and potential *cumulative effects* of the "less than five lot" lot splits in terms of impacts to open space, traffic, air quality, emergency services, etc.
 - If those impacts are determined to be potentially significant, then CEQA mandates that *feasible* mitigation measures be adopted to reduce or eliminate them. Thus, you can ask that feasible mitigation measures for those impacts be explored. Such mitigation measures could be performance based such as, for traffic, "Only lot splits that will generate no more VMT (vehicle miles traveled) than a similar lot split within the nearest planning area will be allowed." Or, for level of services, "Only lot splits that show that they will not increase distance-from-services compared to a similar lot split within the nearest planning area will be allowed."
 - Because the lot splits are more rural and thus would typically generate more VMT and increase emergency response distances and times, most would not qualify under this mitigation standard.
 - To get more sophisticated in response to inevitable complaints at such mitigation measures, you might suggest an alternate mitigation that the excess VMT or strain on emergency response of a rural lot split be allowed if measures are taken to reduce VMT response times by a similar amount elsewhere in the County (i.e. off-site mitigation). This might be done by paying into a program for safe pedestrian routes to school (an example for VMT) or similar programs. For emergency services, mitigation may include an impact fee to cover increased response costs, strict and enforced fuels reduction and fire-safe construction, landscaping and building design.
- **Specific standards for secondary uses and structures "supporting" existing uses in agriculture and possibly other zoning districts.**
 - During the GP process to date, people have expressed a desire to allow "accessory uses" for agricultural operations. We think of things like a farm stand in this category, which is fine, but experience shows that such accessory uses can come to dominate a property and cause significant impacts (an example might be a working ranch that adds a dude ranch lodging component, then enlarges that over time and proposes to add a nine-hole golf course or a music venue).
 - Here again, Sierra County provides an example. The following language is from the Sierra GP:

“Allowed

- Associated residences based on permitted lot size.
- Agricultural uses, including production of timber.
- Animal husbandry.
- Commercial practices performed incidental to or in conjunction with agricultural operations including selling, processing, packaging, preparation for market and equipment storage and repair.
- Local non-commercial sand and gravel operations not exceeding 250 cubic yards and used upon the property from which the sand and gravel is being extracted.

Conditionally Allowed/Approval Criteria

- A limited range of small scale, ancillary activities related directly to the cultivation, harvest, processing, and sale of crops. Compatible ancillary uses shall not create significant visual, noise, or other nuisance for neighboring residents beyond those inherent in agricultural activities.

Any of the following characteristics will define a use as incompatible:

- Use of or construction of structures which do not have a traditional farm appearance.
- Use of more than 2000 square feet of structure for non-farm activities, excluding residential.
- Use of brightly colored awnings, multiple signs, or other features conveying a retail or "circus" appearance on-site or off-site.
- Outside, unscreened storage of more than five non-farm vehicles, resembling a storage, repair, or dismantling business.
- Regular use of purchased non-farm materials exceeding 30% of those used in processing or sales.
- Noise generation exceeding Noise Element standards.
- Bright and unshielded night lighting.
- Hazardous material storage not otherwise required for agricultural businesses.
- Prominent, unscreened non-farm parking and storage facilities.
- Local, non-commercial sand and gravel operations between 250 - 1000 cubic yards.

Williamson Act lands: Because the Williamson Act focuses on crop cultivation and harvest, and because it confers special tax benefits on affected lands, ancillary uses on these lands shall also:

- Enhance agricultural viability.
- Enhance agricultural activities.

- Exclude urban development on agricultural lands.
 - Generate revenues characteristic of agricultural operations while continuing to receive State subventions.
 - Maintain existing parcel sizes or create larger parcels.
 - Not be a use for which a suitable alternative site is available outside of Williamson Act contracted lands.” (Sierra County GP, pp. 1-72,1-73)
- Suggested Comment: Ask the EIR consultants to evaluate impacts of such larger-scale ancillary structures, uses, and potential residential development under the current language. Suggest that language similar to Sierra County be in place to mitigate any potential impacts.

To: Randy Wilson: Planning Director
Plumas County
555 Main St.
Quincy, Ca. 95971

From: Gary Romano: Sierra Valley Farms
1329 County Rd. A23
Beckwourth, Ca. 96129

Re: Comments on the Notice of Preparation: Draft Plumas County General Plan.

- **LAND USE ELEMENT**
 - Ag. Preserve: If you are going to reduce acreages in Agriculture and grazing, you must reduce the qualification for inclusion into the Williamson Act from 80 to 40 acres. In 1965, when the Williamson Act was set up there were thousands of more large acreage farms. Today less than one percent of all occupations are small farmers and two-thirds of them make under \$11,000 per year. We must allow 40 acre farms to be included in the Williamson Act in Plumas County.

- **MINING RESOURCES**

Mining Resources areas should have a minimum of 20 acres for buffer considerations. Ten acres is way too small to offset noise and dust considerations.

- **PHS 6.8.3 To amend the definition to include:**
 - Support local, organic, non-GMO, and grass-fed Agriculture...supply and discourage the use of GMO crops to provide a healthy, secure food source for local supply and complies with accepted public health and safety standards. Pg. 151.

- **AG/FOR 8.2.2**
 - In Ag Preserve to maintain a minimum of 80 acres, and for parcels under 640 acres, and to promote 160 acre minimums for large parcels over 640 acres. In Agriculture/grazing to maintain 80 acres whenever possible with a minimum of 40 acres. Only within townships and the sphere of influence are to allow s-3, 10 and 20 acres.

- **CONVERSIONS**
 - There must be a set of criteria established, and full site evaluation process in order to take property out of Ag preserve, and Ag/grazing and convert it to a secondary suburban residential zoning. The criteria should be based on 66% of the property being not classified as an agricultural soil (Class I-VIII), consideration of historic uses of the property, and the consideration of the land being fallow for a number

of years (intrusion of native species), does not release the land from agricultural viability.

I would like each of these items addressed to me in written form and openly discussed during the draft public hearing.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gary Romano", with a long horizontal flourish extending to the right.

Gary Romano, dba Sierra Valley Farms



United States
Department of
Agriculture

Lassen National Forest
2550 Riverside Drive
Susanville, CA 96126
(530) 257-2151

Tahoe National Forest
631 Coyote Street
P.O. Box 6003
Nevada City, CA 95959
(530) 256-4531

Plumas National Forest
159 Lawrence Street
P. O. Box 11500
Quincy, CA 95971-6025
(530) 283-2050

File Code: 1560

Date: February 8, 2012

Subject: Response to 2030 Plumas County General Plan Notice of Preparation (NOP)

Randy Wilson
Planning Director
Plumas County
555 Main Street
Quincy, CA 95971

To: Randy Wilson, Planning Director, Plumas County

Thank you for inviting the Forest Service to participate in your planning process for the Plumas County General Plan Update and EIR. The Forest Service has had a representative involved since 2009. In addition, District Rangers serve as “agency liaisons” to the five Supervisorial District working groups, communicating the Agency’s interests and policies as an adjacent jurisdiction. One of the goals of the General Plan is to align the County with Federal and State planning processes. We support this goal and have shared, and will continue to share information - - investing in the success of the Plumas County General Plan.

The Forest Service (Lassen, Plumas and Tahoe National Forests) has reviewed the Draft 2030 General Plan. Our interests in the proposed project, as well as any alternatives analyzed in the EIR, include such issues as: hazards (fire, flood, air); public services (fire protection, law enforcement, emergency response); encroachments (structures, roads, trails, utilities); species habitat fragmentation; cultural resources; water and land uses; and planned growth (ex: Timber Protection Zone (TPZ) conversion). We look forward to providing review comments to the EIR, relative to these interests analyzed in the proposed project and various alternatives.

Sincerely,

/s/Jerry Bird
JERRY BIRD
Forest Supervisor
Lassen National Forest

/s/Earl W. Ford
EARL W. FORD
Forest Supervisor
Plumas National Forest

/s/Tom Quinn
TOM QUINN
Forest Supervisor
Tahoe National Forest



Fluke, Nancy

From: Wilson, Randy
Sent: Monday, February 06, 2012 8:18 AM
To: Fluke, Nancy; Herrin, Becky; Coleen Shade; 'Ray Weiss'
Subject: FW: Comments 2030 General Plan Update Comment deadline February 8, 2012

-----Original Message-----

From: Pat Wormington [mailto:airecrew@netzero.net]
Sent: Sunday, February 05, 2012 10:13 AM
To: Wilson, Randy
Subject: Comments 2030 General Plan Update Comment deadline February 8, 2012

Patricia Wormington
7370 County Road A23
Beckwourth, CA 96129
February 5, 2012

Dear Randy Wilson, Planning Director,

Concerning changing the Timber Production Zones from 160 acres to 40 acres.

I would like to recommend that the minimum size of the TP Zones stay at 160 acres. It is no secret our climate is changing with the current extreme dry conditions. A wildfire can jump hundreds in acres in a few seconds threatening communities and timber land. Reducing the TPZ zones to 40 acres increases the risk of wildfires getting started by those living on those 40 acre parcels of land. A fire driven by high winds is unstoppable and threatens not only the residents lives and structures, but the lives of those whose job it is to try to contain such wildfires.

Our home was in the path of such a fire started by a careless burn pile. The wind blew 80 miles an hour and the flames were 100 feet high about 1,000 feet from our home which we designed and built ourselves.

It was a chaparral fire not timber 100 feet or more tall. At the last minute the wind lessened and rain started to fall. If that had not happened our house would not be here today.

We lived on 40 acres of ranch land. Forty acres is not very large. Please keep the TPZ parcels of land no smaller than 160 acres.

Also at the edge of communities I hope to see common AG areas for community gardens and farm animals. It would give kids that live in town an opportunity to participate in 4H projects and residents a place to grow vegetable gardens and chickens, etc. With the increasing amount of imported food into the US, we need food that is local and healthy, free of unlabeled toxins.

Thank you for the opportunity to comment on the 2030 General Plan Update Draft.

Sincerely,

Patricia A. Wormington
Sierra Valley
Beckwourth, CA

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