

ATTACHMENT 1

COMMENTS AND RESPONSES

RESPONSES TO COMMENTS

This attachment contains all of the written comments received by the Seneca Healthcare District on the *Seneca Healthcare District Facility Replacement Project Initial Study/Mitigated Negative Declaration* (IS/MND) and presents the District's responses to each of the substantive comments submitted by public agencies and members of the public. Written comments were received during the 30-day public review period, which extended from March 7, 2023 to April 6, 2023. Pursuant to the California Environmental Quality Act (CEQA), prior to approving a project, the decision-making body of the lead agency must consider the proposed Mitigated Negative Declaration, together with all comments received during the public review process. (CEQA Guidelines Section 15074.) Although written responses to comments on an MND are not required by CEQA, the District has determined to exceed the minimum requirements and prepare written responses to the comments received that pertain to the adequacy of the IS/MND.

According to the Governor's Office of Planning and Research (OPR), the State agencies that were invited to review the IS/MND included the following:¹

- California Natural Resources Agency
- California Department of Conservation (DOC)
- California Department of Fish and Wildlife (CDFW), Region 2
- California Department of Forestry and Fire Protection (CAL FIRE)
- California Department of Parks and Recreation
- California Office of Statewide Health Planning and Development (OSHPD)
- California Department of Water Resources (DWR)
- California Highway Patrol (CHP)
- California Department of Transportation (Caltrans), District 4
- California Department of Transportation, Department of Transportation Planning (DOT)
- California Department of Transportation, Division of Aeronautics
- California Air Resources Board (ARB)

¹ Governor's Office of Planning and Research, CEQAnet Web Portal, <https://ceqanet.opr.ca.gov/2023030234>.

- California Regional Water Quality Control Board (RWQCB), Central Valley Redding Region 5
- California State Lands Commission (SLC)
- Central Valley Flood Protection Board
- California Public Utilities Commission (CPUC)
- State Water Resources Control Board (SWRCB), Division of Drinking Water
- State Water Resources Control Board (SWRCB), Division of Drinking Water, District 2
- State Water Resources Control Board (SWRCB), Division of Water Quality
- California Department of Toxic Substances Control (DTSC)
- Sierra Nevada Conservancy
- Office of Historic Preservation
- California Native American Heritage Commission (NAHC)

No comment letters were received from members of the public or private organizations on the proposed IS/MND. A single comment letter was received from a public agency, submitted by the California Department of Transportation (Caltrans), District 2.

Seneca Healthcare sent a written request to the State Historic Preservation Officer (SHPO) on April 24, 2023 requesting concurrence on the delineation of the Area of Potential Effects (APE) identified in the Cultural Resources Technical Report for the project (see Section 5 of the IS/MND) and the finding of No Adverse Effect. No response from SHPO has been received at the time of preparation of this Responses to Comments document.

The responses to comments presented herein focus on questions raised related to the adequacy of the environmental analysis of the proposed project that was presented in the IS/MND. Some comments address issues unrelated to the potential environmental impacts of the project or the adequacy of the IS/MND. Although these comments are acknowledged and additional information may be provided, detailed responses to such comments have not been included.

For ease of reference, the comments have been bracketed and numbered, and the numbered responses correspond to the designated comment number.

Text Changes to the Initial Study

Based on the public comments received as well as internal review by the District, the following text changes to the Initial Study are made (deleted text shown as ~~strikethrough text~~; added text shown as double-underlined text):

Page 2, 1st paragraph:

Zoning Districts: Single-Family Residential (7-R), Multiple-Family Residential (M-R), Periphery Commercial (C-2), Recreational-Open Space (Rec-OS), Recreation Rural Zone (R-10), and Prime Recreation (Rec-P). The Rec-P portion of APN 100-230-028 also has a Limited Combining Zone (Ltd).

Page 10:

[The checkbox for Hydrology/Water Quality is hereby revised from unchecked to checked.]

Page 18, 2nd paragraph:

The Project would not conflict with existing zoning for, or cause rezoning of, forest land as defined by Public Resources Code 12220(g). The Project property is zoned for Single-Family Residential (7-R), Multiple-Family Residential (M-R), Periphery Commercial (C-2), Recreation-Open Space (Rec-OS), Recreation Rural Zone (R-10), and Prime Recreation (Rec-P). The rezone will replace these designations with Periphery Commercial (C-2) for the health services facilities and parking lots, and Multiple-Family Residential (M-R) for the housing units. Tree removal for construction of the facility and to accommodate the helipad flight path is subject to the regulatory processes of CAL FIRE, in accordance with state law.

Page 60, 4th paragraph:

Impact WQ-1: Offsite Flooding

The proposed Project will not 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. Detention basin(s) capable of retaining the 25-year (24-hour) design storm event have been included in the onsite Project area. Any changes to the design of the detention basin are not expected to substantially change the Project footprint, potentially increasing environmental impacts. Absent adequate onsite detention facilities, storm runoff from the project could potentially exceed capacity of downstream drainage facilities, which could be a potentially significant impact. Implementation of Mitigation Measure WQ-1 would ensure the impact would be less than significant.

Level of Significance before Mitigation: Potentially Significant

Mitigation Measures:

WQ-1 – Drainage Report

Prior to issuance of a grading permit, the project engineer or other qualified professional shall prepare a drainage study that demonstrates, via engineering calculations, that the design of the proposed onsite detention basins will provide sufficient detention capacity to ensure that the rate and volume of storm discharge from the site during the 10-, 25-, and 100-year, 24-hour storm events does not exceed existing, pre-project conditions. The drainage study shall be made available to the California Department of Transportation (Caltrans) District 2, and concurrence of the conclusions of the drainage study shall be obtained from Caltrans by the Seneca Healthcare District prior to issuance of a grading permit.

Level of Significance after Mitigation: Less Than Significant

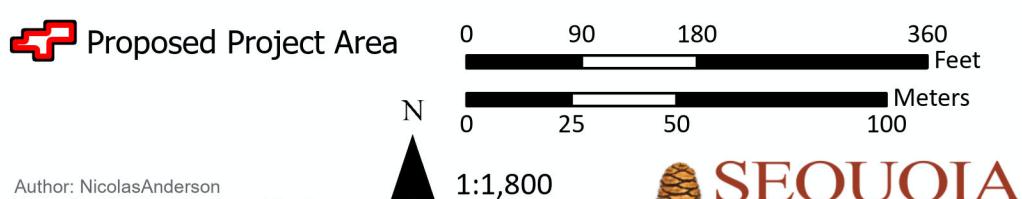
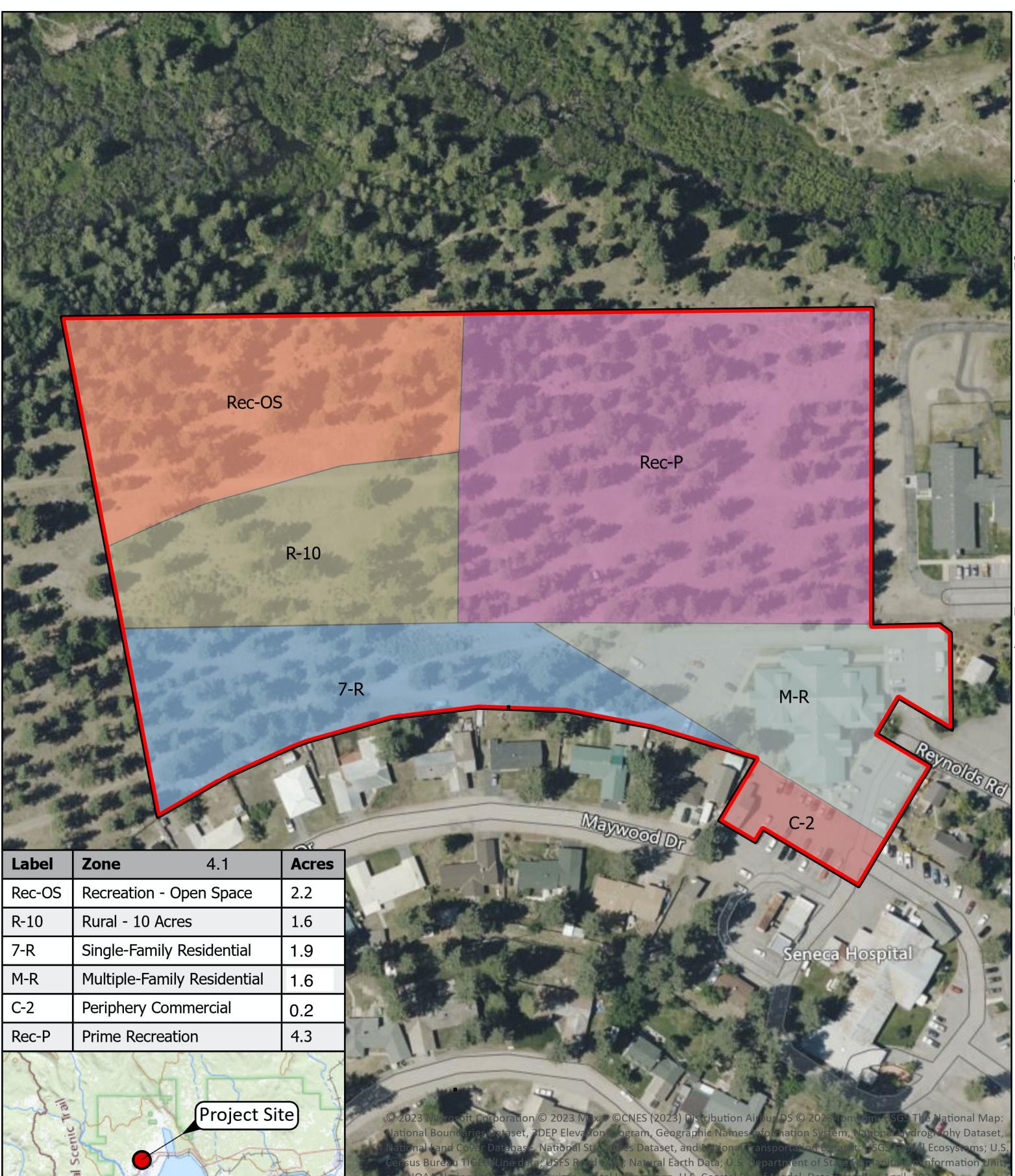
Page 62, Table 3, Existing Zone Districts:

Multiple-Family Residential: 1.5 1.6 [Acres]

Periphery Commercial: 0.3 0.2 [Acres]

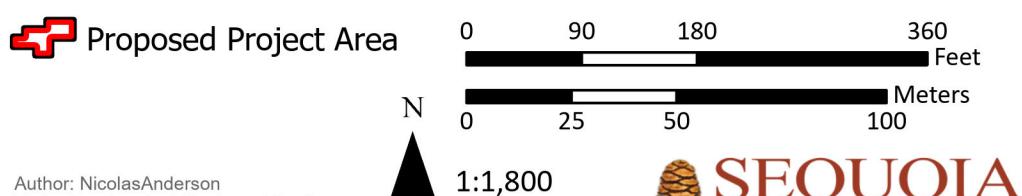
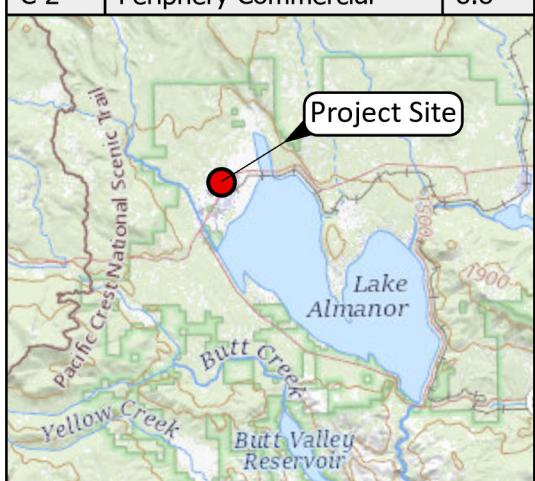
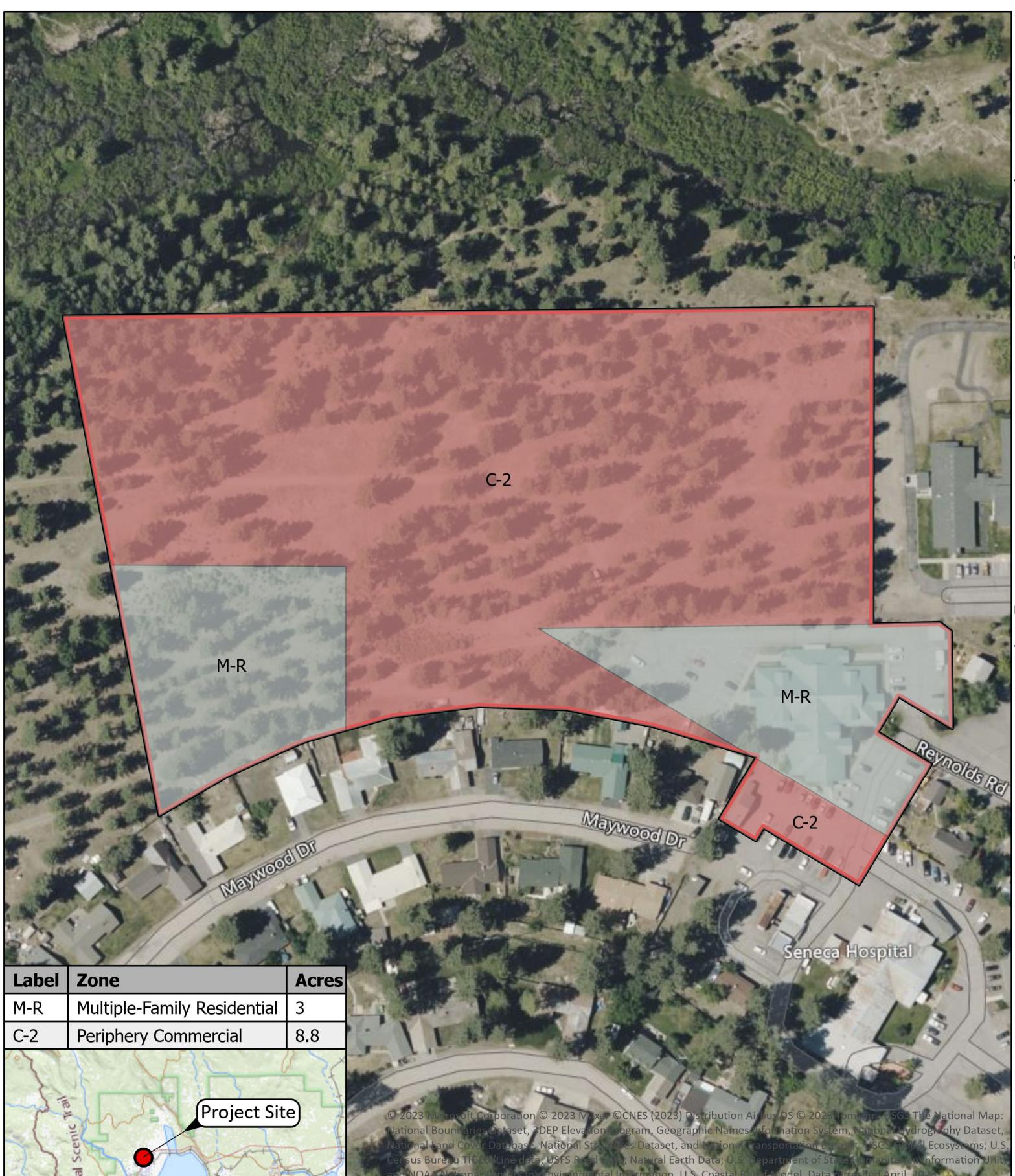
Exhibits C1 and C:

Exhibit C1 (Existing Zoning) is replaced with the following exhibit, which reflects the revisions to Page 62, Table 3 listed above. Exhibit C2 is replaced with the following exhibit in order to maintain consistent format between the two exhibits.



Author: NicolasAnderson
 Projection: Lambert Conformal Conic
 Datum: NAD 1983 2011
 Coordinate System: NAD 1983 2011 StatePlane California I FIPS 0401 Ft US

 **SEQUOIA**
 Ecological Consulting, Inc.



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 **SEQUOIA**
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LETTER A

Cc: Grah, Kathy M@DOT <kathy.grah@dot.ca.gov>; Battles, Michael@DOT <Michael.Battles@dot.ca.gov>; Caruso, Brenda@DOT <Brenda.H.Caruso@dot.ca.gov>
Subject: Seneca Healthcare District Facility Replacement Project

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Good Afternoon,

Thank you for the opportunity to review the Seneca Healthcare District Facility Replacement Project MND. Our comments are below:

A-1 1. Advertising signs are not permitted within the State RW.

A-2 2. A drainage report showing no adverse impacts from the development is requested. A copy of the requirements is attached.

Thank you again for the opportunity to review and comment.

Sincerely,

Cherie Clark
Associate Transportation Planner
Regional Planning and Local Development Review
Caltrans District 2

Required Information for Drainage Review

A Drainage Report shall be submitted that clearly defines the scope of the project related to the existing and proposed drainage. The level of detail in the report should be commensurate to the complexity of the proposed project and should contain summaries of the input parameters as well as the results of calculations. Calculations for each drainage basin, drainage system, and individual drainage unit must accompany the Drainage Report, application and plans. The calculations and report must be signed, checked, dated, and stamped by a registered Civil Engineer. Following is an outline of the items typically included in a Drainage report.

Hydrology:

1. Drainage Basin Maps for the before and after project conditions (contours at a reasonable scale).
 - a. Before Condition (Existing/Pre-Development) – drainage basin(s) delineated and labeled, major features labeled, and flow direction arrows.
 - b. After Condition (Post- Development) – same info as above reflecting project changes in land use and improvements. Submit grading and drainage plans.
 - c. Points of concentrations, and outfalls shall be indicated and include flow direction.
2. Hydrology Summary Tables: Include Pre- Development and Post- Development flow quantities, time of concentration, drainage basin characteristics, area, slopes, soil types, vegetative cover, storage, present usage, runoff coefficient, etc.
3. Applicant shall use California Department of Transportation Drainage Design Standards in Chapter 800 of the Highway Design Manual when connecting or draining to the State Highway Drainage Facilities. The applicant may use local agency standards when they meet or exceed State standards.

Hydraulics: Show all affects of proposed changes on State Highway drainage structures from the “before condition” to the “after condition” including but not limited to:

1. **Cross Drains and Storm drain networks in the State Right of Way:**

Typically designed for 10-yr (to the soffit) and 100-yr flows (with no objectionable flooding) include headwater or hydraulic grade line produced referenced to the invert of system. Include the available headwater at the culvert or drainage inlet, size, slope, end treatments and type of culvert. Culverts that run longitudinal to the State Highway across a road connection are typically designed for a 25-year flow.

2. **Gutters, ditches, and drainage inlets in the State Right of Way:**

Typically designed for 25-yr flows (where traffic speed exceeds 45 mph) to not encroach on the traveled way. Include spread, intercept, and bypass information for each drainage inlet. Equations to determine these parameters are in FHWA’s HEC 22.

Required Information for Drainage Review

3. Detention or Retention facility:

Include design storm method, table or graph of the inflow and outflow hydrograph(s), the depth vs. storage of the facility, and the configuration of the outfall structure with its stage discharge relationship. Include a table of volume stored at each time step.

4. “Master” Plan:

State what agencies were contacted and the impacts the project will have on the downstream drainage.

Drainage Report Narrative: The Drainage Report should include a narrative section describing the project and any affects to drainage. State all relevant assumptions. This section can also explain any historical issues or special aspects of the drainage design.

Historic Drainage patterns should be perpetuated, or drainage systems analyzed to show that there are no impacts or the impacts are mitigated (capacity, velocity related to flooding and erosion). Is a Master plan available?

We recommend considering detention facilities be designed to reduce a project’s impact, but the designer should consider that detention facilities low in a watershed could cause detrimental effects if their release increases the peak flow of the overall watershed.

Caltrans’ primary concern is the safety of the traveling public and protection of facilities within the State’s right of way. The State is also concerned about the impact to adjacent and downstream properties.

Letter A

Cherie Clark, Caltrans District 2

A-1 No advertising signage is planned within the State right-of-way. All identifying signage would be located on the project property and would conform with applicable sign regulations promulgated in Plumas County Code Section 9-2.416.

A-2 No adverse drainage impacts are anticipated from the proposed Project, which is being designed to accommodate, at a minimum, peak storm discharge from the 25-year storm event without increasing peak discharge rates and volumes in comparison with existing conditions. As stated on page 60 of the IS/MND, the Project includes construction of onsite detention basins capable of retaining the 25-year, 24-hour storm event on the site. It is anticipated that these basins will result in a *reduction* in peak discharge rates and volumes in comparison with existing conditions. Furthermore, storm drainage from the proposed construction site flows to the north, flowing overland into Stover Ditch, located adjacent to the northern site boundary. Flows in this ditch are routed through a culvert passing under State Highway 36 about 400 feet north of Aspen Street, ultimately discharging to Lake Almanor. Thus, storm runoff from the site does not currently contribute stormwater to the Highway 36 right-of-way, and this will continue to be the case following implementation of the proposed Project.

It should be noted that a drainage study was previously completed for the Project, and is presented as Exhibit G in the IS/MND. That study states that the Project has been designed to accommodate peak flows from the 20-year, 1-hour storm event up to the 100-year, 24-hour storm event, which would include the 25-year storm event.

While there is no evidence that storm drainage from the proposed Project would adversely affect transportation facilities under the jurisdiction of Caltrans, the Seneca Healthcare District wants to ensure that any concerns Caltrans has are adequately addressed. Accordingly, a new mitigation measure has been included in the IS/MND that will be adopted by the District prior to Project approval, and will become a binding mitigation requirement. Please see the preceding Text Changes to the Initial Study for the language of the new mitigation measure.