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To: George Robson, Tehama County Planning Director, Tehama County General
Plan Review Committee, Tehama County Planning Staff, PMC

Subject: Review of the Tehama County Administrative Draft General Plan.

The following represents my review of the Administrative Draft General Plan.
Please review these comments for incorporation into the final document to be
presented to the Tehama County Board of Supervisors.

2.0 Land Use

Page 2-12, Section 2.7 Land Use Designations,
Valley Floor Agriculture, **corrections and proposed additions**

The Valley Floor Agricultural classification is intended to be applied to all lands which are suited for and are appropriately retained for the production of orchard and field crops. This classification includes lands having present or future significant potential for agricultural production, *availability of water, and on which* ~~and~~ contiguous or intermixed smaller parcels ~~on which~~ having non-compatible uses could jeopardize the agricultural use of agricultural lands. Permitted non-agricultural uses, to the greatest possible extent should not occur on lands that could otherwise be devoted to agriculture.

Page 2-31 Implementation Measure LU-2.2

Require the establishment of a 100-foot buffer zone between any new residential subdivision developments and existing agricultural lands, agricultural processing facilities, or industrial lands.

Require the establishment of a ~~100~~ 300 foot buffer zone between any new residential subdivision developments and existing agricultural lands, and agricultural processing facilities,

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~~or~~ **and a minimum 100 foot buffer zone** from industrial lands.

Background, 100 feet is not enough to safely use orchard spray equipment or aerial chemical application.

Page 2-34 Policy LU-6.1

This policy should also include small minor land divisions which have a cumulative impact on the surrounding area, and its districts. An implementation measure needs to be added to address this.

Page 2-37, Policy CI-5.4

The County recognizes the Community Services District in the Los Molinos, ~~and~~ Gerber-Los Flores area **and the El Camino Irrigation District.**

3.0 Circulation

Page 3-7 Local/Minor

The roads are characterized as having a 25 M.P.H. I believe this to be inaccurate. Most of the roads are not posted and there is a safety issue in many places.

Page 3-14 Implementation Measure CIR 1.4c

Investigate the feasibility of **the development** of traffic calming design features in future residential developments and in areas with traffic issues. **Adopt a program of speed limit signs for roads classified as local minor.**

Background. Unsafe speeds on narrow (22-24) ft wide roads in all areas of the County are common. The County faces potential legal action for not posting when accidents occur, especially when traffic studies are not required for all new land divisions. Such a lawsuit used almost half of the Nevada County Road Budget several years ago.

6.0 Open Space and Conservation

Page 6-5, Implementation Measure OS-1.1d **Proposed addition**

Recognize the existing Groundwater Management Plan of the El Camino Irrigation District on file with the Department of Water Resources.

Background: The Tehama County Environmental Health Department routinely refers individuals desiring a well permit to the District for approval, this OS-1.1d. The Groundwater Management Plan is the authority.

Page 6-5, Implementation Measure OS-1.2a

Require all water supply agencies and companies in the county to identify and use water supply sources other than groundwater, if feasible, **with the exception of the El Camino Irrigation District which has its own Groundwater Plan recognized by the State of California.**

Page 6-6, Policy OS-1.3
Implementation Measure OS-1.3bf

Proposed Addition
Drainage plans shall be required of all land divisions.

Implementation Measure OS-1.3g

Proposed Addition
Prohibit the construction of permitted structures within existing public drainage, and inundation easements unless the approved by the owner of the easement.

Page 6-7
Implementation Measure OS-1.4a

Proposed Addition

- The Development Policies of the water District.

FISH AND WILDLIFE RESOURCES

Page 6-11, Policy OS-3.1
Implementation Measure OS-3.1a

A Biological Site Inventory shall be requires for all Land Divisions.

Background: The Open Space Implementation Measures as written, do not reflect the necessity of a Biological Inventory. This is the basis for conditioning all developments. Most of the environmental sensitivities will never be known unless a Biologist conducts a field review.

Page 6-17, Policy OS-6.1
Implementation Measure OS-6.1d

An archaeological survey should be conducted for all subdivisions as is the case in our neighboring counties. This should be a County requirement without CEQA. There is no way to know what is appropriate without this.

8.0 Safety

Fire Protection
Page 8-11, Policy SAF-3.1
Implementation Measure SAF-1g

Proposed Addition

Require all home or manufactured home replacements to comply with current fire suppression requirements, including electrical wiring components.

Background: Tehama County bears the same obligation to protect the owners or tenants attempting to replace mobile and manufactured housing with newer units from fire as the owners or tenants of any newly constructed residential structure. We are not making the Fire Department's job any easier with present policy. Lower income people deserve the same protection as higher income people.