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SHASTA COUNTY
CLERK'S OFFICE

Good afternoon,

Thank you for hearing my objections to the proposed new building and addition for Golden Eagle Charter School

I did not participate in the first two planning commission meetings, presuming that the impacts of such a large building would be thoroughly considered and evaluated. Being intimately familiar with the site and neighborhood and reading the transcripts that included significant misinformation from the staff and consultants, I changed my mind. I'm not an attorney, a planning specialist, or an academic. I've have had a 45-year career as a general engineering and building contractor, mostly in the public sector, employing between fifteen and thirty full time positions and multiple subcontractors. Having designed, planned, and constructed multiple projects for public agencies and municipalities over the years, as both the General Contractor and as an owner, for multiple reasons I feel this project deserves further review. I've also had the honor of serving as a Trustee on the Mt. Shasta Union School District Board for four years, the Mt. Shasta Recreation and Parks District Board for eight years, the Mt. Shasta Trail Association for eighteen years and a co-founder, and the North Coast Cooperative Board of Directors for six years. I've contracted as a private consultant, construction manager, construction finance and budgeting, and numerous appointments to city and district advisory committees. I have some sense of how public schools operate, how the public review process works, and the nuisances of public service. I can also appreciate that these decisions can be complicated and sometimes difficult.

PUBLIC NOTIFICATION and PROCEDURE:

I must object to some of the public noticing procedures. You've read my detailed comments, and those of others, about the lack of legal notification for the first two meetings as well as this meeting. The deputy clerk has been extremely helpful and professional, and I appreciate that. But I take issue with how the planning department has handled documents that I'm legally entitled to view. I have documentation from the county document portal that my request for documents was complete on March 27th. Without any notification, thirty-three days later on April 30th, the planning department uploaded 201 additional files. On May 1st they uploaded an additional four documents that I did receive notification of on May 2nd, only after I complained to them. I had no idea they were even there until the previous day I went to retrieve some of the original documents. If the file is considered complete, the staff must notify me of any alterations. This was not done for the 201 documents. When I emailed county counsel about this, the response was "The reason for the 4/30/2024 date is because staff internally updated a field that affected all the records, regardless of release." If that is the case, why add that many documents to the file that I must now check? Is the intention to confuse me and overload the system? With this many new documents the portal will not download them as a group. You must download them individually, which is very difficult to do. I challenged counsel to verify if he, or anyone else, had checked this for accuracy, by checking each file for duplication, but got no

response. I have also given access to numerous individuals, and they also were not able to download the documents to check for accuracy and duplication. I've also learned that the software used at the county is different than what is used on my end and set up by the county, not by me. How then, can they verify that what I'm seeing is accurate to their claim? As of today, the portal still shows that the document file was completed over a month ago, which is not true. I have a new, high-speed processor and internet connection and it's still dysfunctional. I challenge anyone in the counsel's office or planning department to try downloading the total file on a typical personal PC and see how that goes.

I've also noticed that all the documents submitted to the portal by planning staff are of high resolution, the pages all orientated vertically, the photographs are clear and easy to see. Yet, many of my comments, and those of several other individuals supporting the appeal, are scanned in very low resolution, the photographs are not legible, many of the pages are oriented ninety degrees to vertical and can't be rotated, and it's just plain difficult to read unless your head is installed parallel to your shoulders. How does this provide the same public access to these comments as compared to the staff and consultant comments? This appears to be bias or preferential treatment.

As of this morning, on the Board of Supervisor's agenda page, there is a link titled "Planning Department's documents" It's subtitled "Comments submitted after deadline for February 21, 2024, hearing. There are both pro and con comments in this section. My comment on February 20th, at 3:21 pm was emailed to the Planning Commission and the Planning Director. This date and time is accurate and it's noted correctly by the Clerk's office. It is not late; in fact, it is the day before the deadline. All other comments are dated either February 19th or 20th. How are any of these late and not considered admissible?

For the last thirty-two years I've lived about one mile north of the building site, and prior to that I lived three years immediately north of the site. We raised two children at these locations, and we were, and still are, a biking and walking family that uses W.A. Barr Road daily. Due to the multiple accidents and close calls on bikes, we eventually didn't allow our kids to bike on that road, especially south of the intersection of W.A. Barr and Ream Avenue. I have witnessed far too many accidents at that intersection and anyone who lives in the area can attest to the fact that it is the most popular place for the CHP to park and wait for people driving right through the stop signs at that intersection. I think it's reasonable to say that this is one of the most heavily traveled roads in the south county, outside of Interstate and state highways. Any person living in the vicinity could attest to the increase in traffic since 1996 primarily due to the popularity of Lake Siskiyou and the South Fork drainage. While I am not a traffic expert, my firsthand observations as a former neighbor and current bicyclist there should not casually be dismissed as immaterial because "relevant personal observations can constitute substantial evidence." (*Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 402.). Not that it's required for good judgement, but I wonder if any of you have the

personal experience of biking or walking along this stretch of road on a regular basis? It can be quite dangerous.

There have been passionate comments, both pro and con, about charter schools. Whether a person supports, does not support, or is indifferent to charter schools has no bearing on this project. Your staff report also acknowledges this on page 7, stating “evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.” I agree, those comments have no bearing on the environmental impacts. There have also been several comments about the “allowed” uses under the current C-U zoning, such as shopping centers, car dealerships, and grocery stores. Posing the argument that a school has significantly less impacts. This same comparison was also made in the staff report to minimize the possible impacts from the school. If the property was purchased for one of these uses, I’m certain the neighborhood would be in a total uproar, yet these are allowed uses. The only impacts that are relevant are the physical impacts that such a building, and its use, have to the surrounding environment.

Considering other county projects in the vicinity in recent years, that required a Mitigated Negative Declaration under CEQA review, the only one that comes to mind is the Lake Siskiyou Trail in 1999, and later the Box Canyon Trail. This was for a two to six foot wide, six-mile trail, around an artificial lake. With three-quarters of it on the existing sewer line road and the Spini/Boss irrigation ditch. I was instrumental in the layout, design, fundraising for the initial studies, and later donating to the construction, all prior to the flood district agreeing to lead the project. As some of you may remember, I was a party to the out of court settlement with the flood district that compelled the flood district to; make the tennis courts public- not private, redirect the timber receipts from the resort to the county, relocate three chalets from the lake side to across the street to allow trail alignment along the lakeshore, and to permanently preserve public access around the lake and along Box Canyon. This also prevented the County from being at risk of financial damages from the state for violating public recreational access under the Davis-Grunsky Act. The point being that all of this was done to require further environmental review resulting in a Mitigated Negative Declaration. I believe the impacts from traffic, light, and noise of that project pale in comparison to this proposed project. I hope some of you have had the opportunity to enjoy those trails and avoid the tangle of traffic that often occurs on W.A. Barr Road because of increased use of the amenities of the Mt. Shasta Resort and the Lake Siskiyou Campground and Marina.

As your staff has stated in their report, as elected officials, and through appointments to the planning commission, these bodies are responsible for the evaluation of public safety, health, and general welfare. Here are photos of the site taken Wednesday of last week. One is showing the complete lack of shoulders looking south, the other one looking north, and the third is some students playing with a ball within 15’ of the pavement in a 35mph zone. I also didn’t see any adult supervision unless the tallest person there with her/his backed turned away from the students is one. This is quite striking in comparisons to the

two regular public-school campuses that are fully secured with fencing and locked gates and doors at all entries at all hours of operation. And, with parking areas securely locked from all entry points to buildings. What would happen if a student kicked a ball into the street and another student ran out to get it? Page 2 of the conditions of approval, paragraph 12, does require the school to install a “security system to mitigate trespassing onto the property”. This could simply be a photo electric sensor, or a fence of any height. Using the word “mitigate” allows other choices than fencing. Any fence could be trespassed around, therefore In the interest of student safety and security for the surrounding neighbors, a fencing plan should be required for the public to review. This should have the same requirements at all property boundaries, including thick woodlands. Listening to the Planning Commissions dialogue with school officials about fencing was more confusing than clarifying. It was clear that the school has no intention of a full perimeter fence. A fence can be built anywhere, under any conditions, regardless of physical obstacles. I saw no conditions of approval addressing this impact.

OCCUPANCY:

Page 4, table 1, of the staff report, calculates the prior approved total occupancy at a total of 310. And the proposed total occupancy of 260. I’m not sure how this is representative of the actual use. The prior church and associated school operated on a limited basis, as acknowledged in the Conditional Use Permit. Yet the proposed CUP would allow occupancy seven days per week. How are these figures even comparable or relevant? Occupancy is also related to frequency of use in terms of how it contributes to the physical impacts of a building this size. Assuming the prior church was used two days per week and the school five days per week, the approximate impact was 800 uses per week. Assuming the proposed use is five days per week only, which it would not be restricted to, the impact would be 1,300 uses per week. Page 4, first paragraph of the staff report states, “The proposed occupancy of UP-23-08 is lower than the approved occupancy of UP-96-03 since the proposed project will be eliminating church operations from the project site.” A fair argument can be made that this computation is incorrect and not representative of the actual proposed use requiring further mitigation.

Without further investigation into the physical impacts, many scenarios are possible. Is summer use allowed? Is weekend and evening uses allowed? Are there restrictions on the operational hours? Can the school also rent the facilities for other uses such as volleyball, basketball, ceremonies, etc. which are common practices for public schools? How will all of this be monitored if these uses are restricted? The argument frequently used by the staff and consultants is that the use by the school is limited so that it will not physically impact noise levels, light disbursement, or pedestrian and bicycle safety. This is an invalid argument if these uses are not considered. Some would argue that this is not possible, but I will only cite what has occurred for the last year on this site without the proper Conditional Use Permit in place. If the Use Permit is correct for the current uses, why is a new one being requested now? As a contractor, the clear message is to proceed without the correct permit, and then ask for forgiveness later.

PUBLIC SAFETY:

Page 11, paragraph 11, of the staff report states: “for purposes of CEQA, a traffic study by Headway Transportation was completed in April 2023. The next paragraph states that an updated study was completed in April 2023. The actual date of the second study is December 8th, 2023, not April 2023. I could not find any information related to a traffic study, such as a car count, line of sight studies, speed limit variability, lane width, shoulder width or separation, etc. The first study used discussed a 960 sf portable building and uses the exemption of less than 10,000 sf for some of the rational for exemption. The second report in December corrects this and updates the building size to 23,800 sf used by the planning commission, but not the correct 28,300sf later disclosed. The report states, page 3 paragraph 6, “CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000sf. The proposed new building exceeds this footage.

On page 7 of the staff report for the Planning Commission meeting, in the section titled Planning Response, states:

“As a charter school serving the broader community, rather than a specified zone or district immediately adjacent to the school, travel to and from the school will be primarily by vehicle mode. The absence of sidewalks and marked bicycle lanes in the project area is not a significant concern relate to this specific school operation since few students would walk or bike to this school even if those facilities were in place.”

This rational is rather ridiculous. How can this be assumed, much less enforced at a later date? There is no proposed *Condition of Use* that restricts the school from later changing their entire model and allowing transportation of the entire student population of up to 225 students and 35 staff by any mode they want. They could walk, bike, take a bus, travel by private vehicle, or by any means they want to. This is simply avoidance of the real issue by suggesting a scenario the county would have no future control of.

More importantly, the Office of Planning and Research Technical Advisory also states “of land use projects, residential, office, and retail projects tend to have the greatest influence on vehicle miles traveled. Schools are not mentioned in the VMT threshold discussions. Rather schools are mentioned in section H. In short, lead agencies can consider increasing and varied school options and new locations as a potential measure to reduce Vehicle Miles Traveled”. How can this be when the traffic consultant acknowledges that travel to/from the school will be primarily by vehicle mode? As different from regular public schools, the majority of the traffic will be by private vehicles and the traffic consultant uses, in part, this rational to dismiss the need for crosswalks, a bike/pedestrian lane, or wider shoulders. It appears to me that in comparison to regular public schools, that use buses to transport most students, that this school will increase vehicle miles traveled, not reduce it. The physical impact due to increased vehicle miles traveled from the school will not conflict with the students or staff but will instead conflict with the general public that

utilizes W.A. Barr for this purpose. Again, there is a fair argument to further analyze this physical impact.

The traffic report also uses another rationale for exemption, stating: “this project will not conflict with any multimodal transportation programs or plans. Therefore, the project would have less than significant impact on bicycle or pedestrian travel.” The staff report dismisses the most recent Mt. Shasta Mobility Plan due to the lack of jurisdiction of the City of Mt. Shasta on county lands. Though due to a lack of any recent information from the county, and the stated interest by both the county and the city of Mt. Shasta to cooperate on such matters, it should be considered as relevant. Interestingly, the staff report ignored my comment regarding the adopted *Siskiyou County 2021 Regional Transportation Plan*. The plan states: “Siskiyou County offers several recreational off-road biking and hiking trails and is striving to improve roadway bicycle and pedestrian access and safety. Constraints with bicycle and pedestrians’ facilities in the County include a transportation network that is not well connected or maintained, as well as long distances between destinations. The city of Yreka has an adopted Bicycle and Pedestrian Master Plan and Mt. Shasta is currently developing a citywide Active Transportation Plan.” It’s clear that the County has the intent to cooperate with the City of Mt. Shasta regarding common multimodal transportation plans. Most importantly, and contrary to both the staff report on and traffic study this is directly in conflict with the County Regional Transportation Plan. This should have been considered when the traffic study was done. There is a fair argument that further consideration be given by a complete traffic study.

In 2018, when Golden Eagle did hire a licensed traffic engineer for the proposed location on Pine Street, he estimated that a similar sized school, which this is, would result in an increase in vehicle mile trips, not fewer (attached and flagged). Now that Golden Eagle has hired a civil engineer, not a licensed traffic engineer, for the W.A. Barr Road location, he has determined that there will be fewer vehicle miles travelled. How could this possibly be when the W.A. Barr site is even further from the center of town and would require greater travel distance? He also noted the distinct possibility that any problem with traffic flow inside the parking areas, such as a bus stopped to unload, could cause traffic to back up onto the street during periods of high use. Under this scenario, this could cause vision impairment, making it dangerous to exit the parking lot. This is entirely possible at this location as well and merits further study. These are directly at the heart of the *Fair Argument Standard* and require more review.

LIGHTING:

I have previously submitted my comments concerning lighting and hope you have taken the time to read them. I submitted a photograph of Golden Eagle’s sign lighting with light bulbs glaring visibly at motorists on W.A. Barr Road in violation of the lighting standards in County Code section 10-6.5823. That is a fair argument of an existing, uncorrected significant lighting impact that violates our law.

I also questioned the lack of any lighting plan for the parking areas. At their proposed Pine Street location, using virtually the same building footprint and occupancy, the parking lot lighting was 4 to 8 times brighter than recommended standards. How will the proposed parking lots be lit? Certainly, the school will have occupancy at times when lights will be necessary for both pedestrian and vehicle safety. If this is not the case, why did the previous location, with essentially the same building, have a detailed lighting plan? This can't simply be deferred to the building permit process, where the public would be denied the right to comment on physical impacts that could affect them. This provides another fair argument that these physical impacts could be significant and CEQA requires further review.

NOISE:

The applicant's noise consultant, Bollard Acoustical, admitted on April 30, 2024 that the noise study that the County relied upon was inadequate in not studying construction noise impacts. Two months after the Planning Commission approved the Project, he prepared a second report that predicted construction noise could expose neighboring homes to noise levels of 70 decibels. That is strong evidence of a significant noise impact. His earlier measurements found existing daytime noise levels were about 55 decibels at the nearest home, the Mount Shasta Ranch B&B. (See Table 2, Site LT-3: 55 dBA). That evidence identifies an increase in noise levels there during construction of 15 decibels. That in turn constitutes a fair argument of a significant noise impact, because as he wrote on page 7 of his earlier report, any noise level increase greater than 5 dB is considered significant.

SUMMARY:

By recommending conditions to the project that may mitigate some impacts, the staff has acknowledged that such impacts may occur. These impacts are supported by substantial evidence from the public and some from the staff itself.

Some examples are:

- To abandon the septic system and connect to the sewer line, due to increased occupancy, to protect water quality.
- To comply with fire safe requirements to reduce a greater fire risk that has occurred since 1996.
- To limit maximum school capacity to 260 occupants, from the prior approved 60 occupants, to limit the impacts of traffic safety, lighting, and noise.
- To limit construction hours to between 6:00am and 6:00pm to mitigate noise impacts to nearby neighbors.
- To limit the speed to 25 mph, without defining the area of the zone or location of sign posting, to mitigate safety along the road.

The staff maintains that there is no evidence that the proposed project would cause any new significant environmental harm. To quote the staff report "The Planning Commission

reasonably exercised its judgment in evaluating public comments received. The vast majority of which were simply conclusory or argument.” This conclusion pertains to information received prior to February 21st but does not address comments received since then.

This implies that some of those comments, and possibly some of the comments since that date, do have evidence of physical impacts. The Planning Commission imposed some mitigation measures to reduce those impacts, labeling them as “conditions”. But an agency does not impose such measures out of some excess of caution, but rather for legitimate reasons that may cause predictable harm. The staff has already provided evidence that this project will cause some new environmental impacts regarding traffic safety, lighting, and noise. The staff attempts to justify the position to amend an existing Mitigated Negative Declaration instead of recommending a new one by arguing that these conditions are not environmental mitigations when it writes:

“The imposition of a condition of approval on a project does not trigger the need for a Mitigated Negative Declaration in itself. They reference the case *Protect Telegraph Hill versus City and County of San Francisco.* “

Reading this case the court ruled:

“We conclude no review was necessary under CEQA because the project was categorically exempt from review and no unusual circumstances exist to override the exemption on the basis the project will have a significant effect on the environment. We also conclude the city permissibly approved a conditional use authorization for the project.”

I don't see how this case is applicable. Golden Eagle is obviously not exempt from CEQA, and the staff clearly isn't suggesting that. San Francisco did not impose environmentally focused conditions like the planning commission and staff is recommending for this project. I don't see the relevancy.

By recognizing the need for the further reduction of speed in front of the school, the staff itself recognized the risk to public safety. CEQA requires that this issue be resolved before the project can be approved, not afterward. This passes the responsibility of speed reduction to some future Public Works decision. The courts have made it clear that this approach, to decide this matters after public input, is not legal. In 1988 the court decision *Sundstrom versus County of Mendocino* cleared this matter up by ruling:

“While a fair argument of environmental impact must be based on substantial evidence, mechanical application of this rule would defeat the purpose of CEQA where the local agency has failed to undertake an adequate initial study. The agency should not be allowed to hide behind its own failure to gather relevant data.”

The court also commented:

“The City’s assertion that it could find no fair argument that there would be any potentially significant environmental impacts rests, in part, in its failure to undertake an adequate environmental analysis.”

The Planning Commission’s Condition of Approval #15 states:

“A 25-mph sign shall be installed **to the satisfaction of the Public Works Department.**”
The public will not have that future opportunity, and this is exactly what the Sundstrom case prohibited.

My evidence submittal included a copy of the use permit for Evangelical Free Church of Mount Shasta UP-96-03. Condition 10 of the use permit for the Evangelical Free Church of Mount Shasta states, **“In the event church operations cease, school operations must also cease.”** It is clear to me that the property was sold by the Evangelical Free Church of Mt. Shasta in January of 2023, and that the church ceased operations some time in 2022. Therefore, the associated school allowed under the CUP also ceased operations in 2022. At that point in time no Conditional Use Permit existed and there is currently no Conditional Use Permit to amend.

I read a lot of comments while reviewing this project. The one I like the best is from Siskiyou County Senior Planner, Rachel Jereb to Nick Trover, the proponents construction project manager in July of 2023. It reads:

“Once the application is submitted, our Permit Tech will send copies of your project out to all state and local agencies who might be interested in commenting on it. After all comments are received, we will take a look at the potential environmental impact of the project as it relates to the California Environmental Quality Act (CEQA). **I expect that we will likely end up with a Mitigated Negative Declaration.**”

Though I understand this is not binding, this is the most reasonable comment I’ve read from a professional planner working on this project.

At the core of my appeal is whether substantial evidence has been brought forward, using the *Fair Argument Standard*, to require further review under CEQA. While listening to the audio recording of the Planning Commission’s meeting on February 21st, at minute 28, there is a conversation between Mr. Carroll, Assistant County Counsel, and Commissioner Hart. This is what I heard Mr. Carroll say:

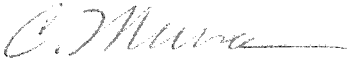
*Yes, at this stage where we have a CEQA addendum, and we don't have a Mitigated Negative Declaration, or EIR. The question can be is there a fair argument, not whether, as you just said, Commissioner Hart, **whether who's right or who's wrong or who has the better argument doesn't matter? If there are two competing opinions and one of the***

opinions is supported by fact, and indicates there could be a significant environmental impact and really the next stage is if there's a fair argument and CEQA would normally dictate that we go to a mitigated negative declaration rather than an Addendum, Mr. LaForest's letter comes in at the last minute after public hearings have been closed on an issue that the planning Commission didn't explicitly ask to be heard. So, you know, it's a little bit tricky. But you're, you're generally correct. Where there's two competing arguments, then we normally go to a Mitigated Negative Declaration or an EIR.

This sounds like solid legal advice to me. I'm not taking this out of context and it directly addresses my contention that there is substantial new evidence, supported by fact, that I have presented. In this case, I have brought forward facts and information that support a fair argument under CEQA to require a Mitigated Negative Declaration, at a minimum.

I respectfully request that this project be sent back to planning for further CEQA review.

Thank you for your consideration,



Chris Marrone





Traffic Impact Study

FOR

Golden Eagle Charter School

Mount Shasta, CA

May 29, 2018

PREPARED FOR:

Golden Eagle Charter School

PREPARED BY:



YOUR QUESTIONS ANSWERED QUICKLY

Why did you perform this study?

This Traffic Impact Study evaluates the potential traffic impacts associated with the proposed Golden Eagle Charter School project in Mount Shasta, CA. This study of potential transportation impacts was undertaken for planning purposes and to determine what traffic controls or other mitigations may be needed to reduce potential impacts, if any are identified.

What does the project consist of?

The project consists of a charter school serving Kindergarten through 12th Grade with approximately 350 students and 30 staff. However, due to intentional scheduling only 200 students and 15 staff will be on site at any one time. The analysis is based on the latter numbers.

How much traffic will the project generate?

The project is anticipated to generate 496 Daily, 162 AM peak hour, and 116 Afternoon peak hour (when school is dismissed) trips.

Are there any traffic impacts?

There are no significant traffic impacts.

Are any improvements recommended?

In order to provide adequate sight triangles for vehicles exiting the full access driveway on Pine Street, the project proposes to prohibit on-street parking 55 feet north of the driveway and 35 feet south of the driveway (see **Exhibit 2** on page 10).

Cedar Street is currently approximately 15 feet wide where the project would connect, which is adequate for an emergency access, but if the roadway were to become a full access connection in the future, half-street improvements would be needed to widen the roadway for two-way travel.

A school zone should be created on Pine Street in accordance with *California Manual on Uniform Traffic Control Devices (MUTCD)* standards.

LIST OF FIGURES

1. Project Location
2. Site Plan
3. Existing Lane Configurations, Controls, and Traffic Volumes
4. Project Trip Distribution and Assignment
5. Existing Plus Project Lane Configurations, Controls, and Traffic Volumes

LIST OF APPENDICES

- A. Existing LOS Calculations
- B. Existing Plus Project LOS Calculations

INTRODUCTION

This report summarizes the results of a Traffic Impact Analysis completed to assess the potential impacts to the local roadway network associated with the development of the Golden Eagle Charter School project in Mount Shasta, California. This Traffic Impact Study has been prepared to describe existing traffic conditions, identify potential impacts on all modes of transportation, document findings, and make recommendations to mitigate impacts, if any are found.

Study Area and Evaluated Scenarios

The proposed project is located east of Interstate 5 (I-5) between Pine Street and Cedar Street and across from Mount Shasta Mercy Hospital. The project location is shown on **Figure 1** and the project site plan is shown on **Figure 2**.

The following intersections are included in the analysis:

- Cedar Street / W. Ivy Street
- Pine Street / W. Ivy Street
- Pine Street / W. Lake Street
- Pine Street / South School Driveway (Plus Project Conditions only)
- Pine Street / School Drop-Off Entrance (Plus Project Conditions only)

The existing study intersection lane configurations and traffic controls are shown on **Figure 3**, attached.

This study includes analysis of the weekday AM peak hour and weekday Afternoon peak hour of school traffic (when school is dismissed) as these are the periods of time in which the project is expected to generate the most traffic. The evaluated development scenarios are:

- Existing Conditions (no project)
- Existing Plus Project Conditions

Future year scenarios have not been evaluated at this time due to very low levels of growth anticipated in the 20 year horizon. City staff is not aware of any significant planned development projects in the study area. Lacking other growth in the area, future (cumulative) conditions would not likely be substantially different than the Existing Plus Project scenario presented in this report.

ANALYSIS METHODOLOGY

Level of service (LOS) is a term commonly used by transportation practitioners to measure and describe the operational characteristics of intersections, roadway segments, and other facilities. This term equates seconds of delay per vehicle at intersections to letter grades "A" through "F" with "A" representing optimum conditions and "F" representing breakdown or over capacity flows.

Intersections

Intersection level of service methodology is established in the Highway Capacity Manual (HCM), 2010, published by the Transportation Research Board. The methodology for unsignalized (side-street stop controlled) intersections determines the level of service by comparing the average control delay for the worst movement/approach to the delay thresholds in **Table 1**.

Table 1: Level of Service Definition for Intersections

Level of Service	Brief Description	Average Delay (seconds per vehicle)
		Unsignalized Intersections
A	Free flow conditions.	< 10
B	Stable conditions with some affect from other vehicles.	10 to 15
C	Stable conditions with significant affect from other vehicles.	15 to 25
D	High density traffic conditions still with stable flow.	25 to 35
E	At or near capacity flows.	35 to 50
F	Over capacity conditions.	> 50

Source: Highway Capacity Manual (2010), Chapters 19, 20, and 21

Level of service calculations were performed using the Synchro 9 software package with results reported in accordance with the current HCM 2010 methodology.

Level of Service Policy

Siskiyou County

The 2016 Siskiyou County Regional Transportation Plan includes the following objectives and policies related to level of service:

Objective 3.3.1.2: *Maintain regionally significant roadways at acceptable safety standards and acceptable Level of Service.*

Policy 3.3.1.2.1: *Identify and eliminate unsafe conditions on State highways in coordination with Caltrans.*

Objective 3.3.1.3: *Maintain a target LOS at the transition between LOS C and LOS D or better for average daily conditions on designated State highways.*

Policy 3.3.1.2.1: *The traffic impacts of proposed land uses shall be evaluated and mitigated in relation to stated goals, objectives, and policies of the RTP.*

City of Mount Shasta

The *City of Mount Shasta 2007 General Plan* includes the goals, policies, and implementation measures related to level of service:

Goal C1-1: *Ensure that land development does not exceed road capacities.*

Policy C1-1.1: *Level of service shall be the standard for judging whether a road has adequate remaining capacity for average daily traffic generated by a proposed project.*

Policy C1-1.2: *Level of service "C" shall be the minimum acceptable service level during normal conditions. Peak-hour reduction to level of service "D" may be permitted provided there are plans in place to make improvements required to improve the level of service.*

Implementation Measures:

CI-1.2(a): *Public Works, in cooperation with Caltrans and Siskiyou County, shall regularly monitor traffic volume on roads that presently have levels of service of C or D. Average Daily Trips (ADT) shall be determined and made available to the Planning Department for review of development proposals.*

CI-1.2(b): *When a road segment or intersection is found to be approaching Level of Service C (defined as ADT being within ten percent of the highest LOS C traffic volume threshold), or to have significant safety issues related to the volume of use, the City shall initiate plans for improvements designed to increase capacity, and/or to improve other operational features of the roadway or intersection to improve the LOS and traffic safety.*

CI-1.2(c): *The improvements shall be designed to be initiated by the time traffic volume is approaching Level of Service D. This may result in the generation of impact fees as a means of accumulating funds for the improvements caused by private development.*

CI-1.2(d): *The City shall require traffic analysis to be conducted for all projects that will generate sufficient traffic to use ten (10) percent or more of the capacity of the roadway at LOS C as shown in Table 4-2. When a project will potentially impact a state highway, consideration will be given to the Caltrans Guide for the Preparation of Traffic Impact Studies to determine when and how a related traffic study should be completed.*

CI-1.2(e): *Projects that will impact streets and/or intersections that currently, or are projected to operate, at below LOS C, shall prepare a traffic analysis to determine the extent to which they impact the streets and/or intersections. For facilities that are (short-term conditions), or will be (cumulative condition), operating at unacceptable Levels of Service without the project, an impact is considered significant if the project: 1) increases the average delay at intersections by more than five seconds, or 2) increases the volume-to-capacity ratio by 0.05 or more on a roadway segment.*

CI-1.2(f): *If a street and/or intersection is impacted by a project for short-term conditions, and the project's pro-rata share is equal to or above twenty five (25) percent, then the project shall be required to construct the necessary improvements to maintain an acceptable level of service.*

CI-1.2(g): *If a street and/or intersection is impacted by a project for cumulative conditions, and the project's pro-rata share is below twenty five (25) percent, then the project shall be required to pay their pro-rata share of the cost of constructing these improvements.*

CI-1.2(h): *The City shall regulate truck travel as appropriate for the transport of goods, consistent with circulation, air quality, noise, and land use goals.*

CI-1.2(i): *The City may install, or require to be installed, traffic calming measures on existing and future streets.*

LOS C was used as the threshold (i.e. minimum acceptable level of service) for this analysis.

Parking Requirements

The *Mount Shasta Municipal Code* includes the following parking space requirements for Educational Facilities:

- Public, Private, or Parochial Elementary: 1 space per 500 square feet of floor area PLUS 1 space per employee PLUS adequate space for loading/unloading of students
- High School or College: 1 space per 10 students PLUS 1 space per employee PLUS adequate space for loading/unloading of students

EXISTING TRANSPORTATION FACILITIES

Roadway Facilities

A brief description of the key roadways in the study area is provided below.

Pine Street is a two-lane Arterial roadway from Lassen Lane to Lake Street. The roadway runs in a northwest-southeast direction and has a posted speed limit of 25 mph from Lake Street to Alma Street and 30 mph from Alma Street to Lassen Lane. Pine Street crosses over Interstate 5 (I-5) and is called Lassen Lane west of I-5.

Lake Street is a four-lane Arterial roadway with left-turn pockets from Morgan Way (west of Pine Street) to Pine Street. East of Pine Street, Lake Street has one-lane in the eastbound direction and two-lanes in the westbound direction. East of Maple Street, Lake Street is a two-lane roadway with one lane in each direction. Lake Street has a posted speed limit of 25 mph in the project area.

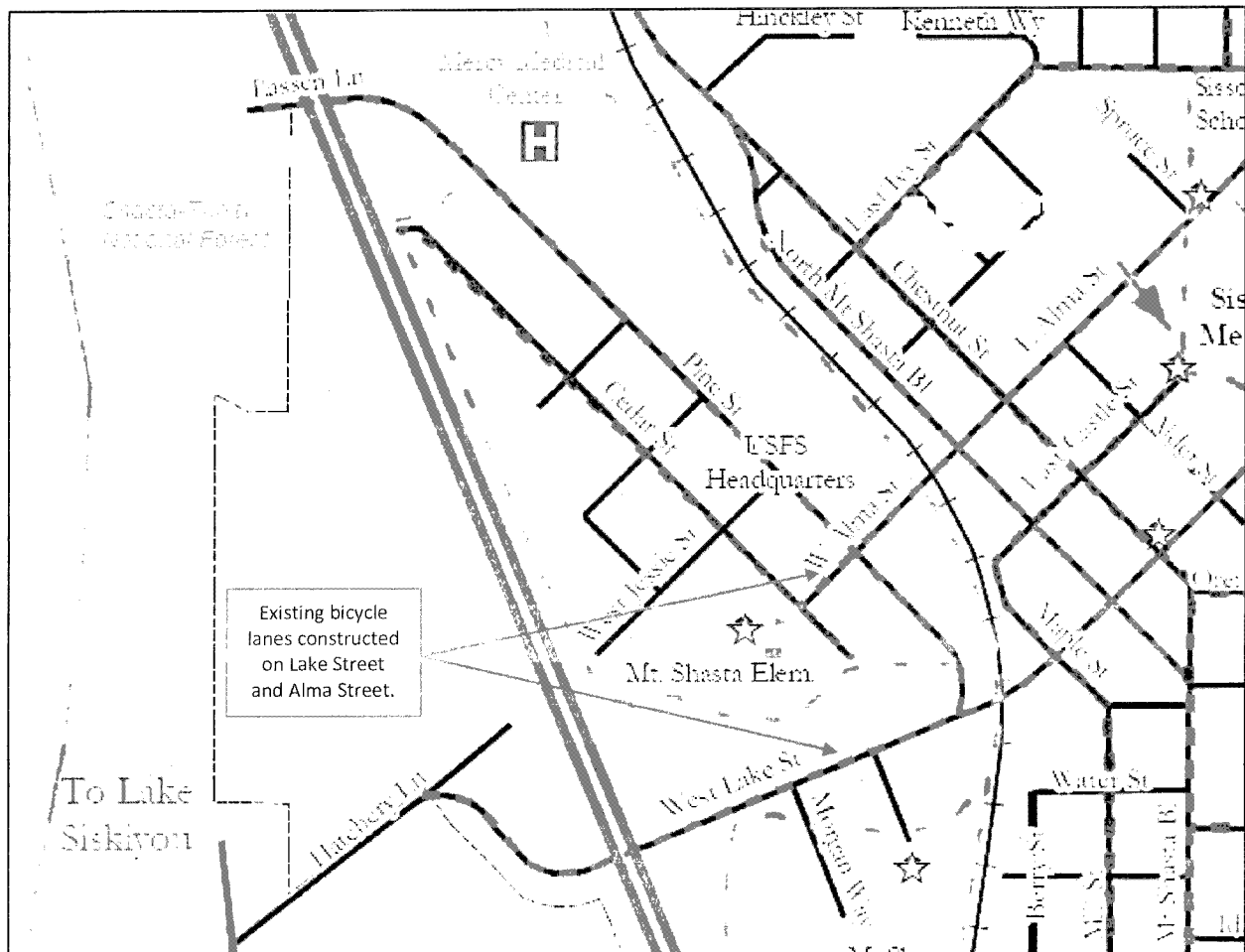
Cedar Street is a two-lane local roadway that runs parallel to Pine Street. Cedar Street primarily serves residential uses, as well as Mount Shasta Elementary School at its south end. Cedar Street will serve as a secondary emergency access roadway to the project site at its north end.

West Ivy Street is a local, residential roadway that connects Pine Street and Cedar Street, and serves residential uses.

Bicycle and Pedestrian Facilities

Existing bicycle facilities near the project site are limited. There are existing bicycle lanes on Lake Street and Alma Street. The City of Mount Shasta *Bicycle, Pedestrian, and Trails Master Plan 2009* (Alta Planning and Design) includes proposed Class II bicycle lanes on Pine Street from Lake Street to Lassen Lane, and a Class III bicycle route on Cedar Street. The Plan also proposes a Class I bicycle path that would border the west side of the project site and make a loop from the north end of Pine Street to the south end of Pine Street (shown in green on **Exhibit 1** below).

Exhibit 1: Proposed Bikeway System



Source: Map 3 - Mount Shasta Bicycle, Pedestrian, and Trails Master Plan (February 2009)

Existing pedestrian facilities are more readily available near the project site, with sidewalks along at least one side of Pine Street for its entire length between Lake Street and Lassen Lane. Sidewalks also exist along both sides of Lake Street east of Morgan Way in the project area. Sidewalks are intermittent along Cedar Street and Ivy Street. Crosswalks are available at most of the intersections on Pine Street and Lake

Street, however there are no crosswalks at the Cedar Street / W. Ivy Street and Pine Street / W. Ivy Street intersections.

Transit Facilities

The Siskiyou Transit and General Express (STAGE) provides transit service throughout Siskiyou County. STAGE provides service in Mount Shasta with a stop on Pine Street at Mercy Hospital, directly across from the proposed project site. Service is provided Monday through Friday from approximately 6:30 AM to 7:30 PM.

EXISTING CONDITIONS

Traffic Volumes

Existing AM (7:00 AM to 9:00 AM) and Afternoon (2:00 PM to 4:00 PM – when school is dismissed) peak hour turning movement volumes were collected at the study intersections on a mid-week day in March 2018 when schools were in full session. **Figure 3** shows the existing intersection turning movement volumes at the study intersections.

Note, the traffic volumes at the Cedar Street / Ivy Street intersection are very low (with multiple movements with zero volume). Synchro analysis software is not able to analyze intersections with zero volume movements, therefore the movements with zero volume were changed to 1 vehicle for analysis purposes.

Intersection Level of Service Analysis

Existing conditions intersection level of service analysis was performed using Synchro 9 software, with reports based on *HCM 2010* methodology. The peak hour factors (PHF) from the existing counts were used in the analysis. A default heavy vehicle percentage of 2 percent was also used in analysis. The level of service results are presented in **Table 2** and the calculation sheets are provided in **Appendix A**, attached.

Table 2: Existing Conditions Intersection Level of Service

Intersection	Control	AM		PM	
		Delay ¹	LOS	Delay ¹	LOS
Cedar St/Ivy St	Side-Street STOP				
Eastbound Approach		8.8	A	9.0	A
Westbound Approach		8.7	A	8.7	A
Northbound Left		7.2	A	7.2	A
Southbound Left		7.2	A	7.2	A
Pine St/Ivy St	Side-Street STOP				
Eastbound Approach		9.7	A	10.8	B
Westbound Approach		12.3	B	12.2	B
Northbound Left		7.6	A	7.7	A
Southbound Left		7.7	A	0	A
Lake St/Pine St	Side-Street STOP				
Southbound Approach		10.4	B	11.7	B
Eastbound Left		8.0	A	8.5	A

Notes: 1. Delay is reported in seconds per vehicle for the worst approach/movement for side-street stop controlled intersections.

Source: Traffic Works, 2018

As shown in the table, the existing study intersections currently operate at acceptable levels of service during the AM and PM peak hours.

PROJECT CONDITIONS

Project Description

The proposed project consists of a charter school serving Kindergarten through 12th Grade with approximately 350 students and 30 staff. However, due to intentional scheduling only 200 students and 15 staff will be on site at any one time. The analysis is based on the latter numbers. The project site is located on a vacant parcel west of Pine Street and east of Cedar Street, and across from Mount Shasta Mercy Hospital.

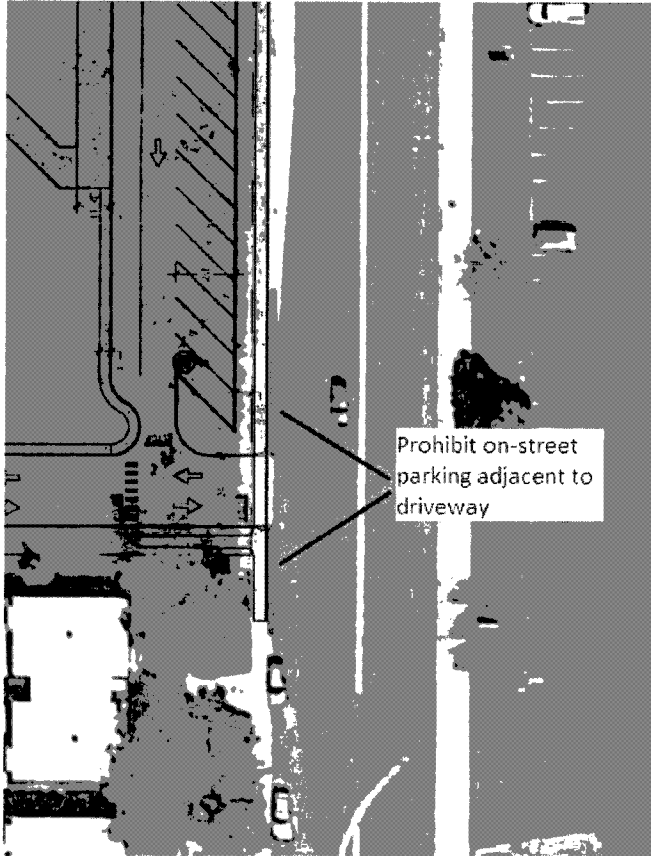
Project Access

As shown on the project site plan (**Figure 2**), the proposed project includes one full access driveway and one drop-off entrance on Pine Street, as well as an emergency access only driveway on Cedar Street. The full access driveway on Pine Street would also serve as the exit for the student drop-off zone.

On-street parking is currently allowed on both sides of Pine Street adjacent to the project site. To provide adequate site triangles for vehicles exiting the full access (south) driveway on Pine Street, it is recommended that parking be prohibited on the north and south sides of that driveway. The American Association of State Highway and Transportation Officials (ASHTO) *Geometric Design of Highways and Streets 2004 (Green Book)* provides standards for determining adequate sight triangles for vehicles entering a major street from a stop sign based on the major street speed limit. The posted speed limit on

Pine Street is 30 mph. As shown on **Exhibit 2**, on-street parking should be prohibited for at least 55 feet north of the driveway and at least 35 feet south of the driveway.

Exhibit 2: Site Access Recommendations



Cedar Street north of W. Field Street (dirt road north of Ivy Street) narrows to approximately 15 feet wide (as shown on **Exhibit 3**), which can only accommodate one-lane of traffic. This is adequate for an emergency access, but if the roadway were to become a full access connection in the future, half-street improvements would be needed to widen the roadway for two-way traffic.

Emergency access would be adequately provided with multiple points of ingress and egress to the site.

Exhibit 3: Cedar Street at W. Field Street



Parking

The minimum number of parking spaces required was calculated based on the parking standards presented in the Analysis Methodology section above. The standards include requirements for an elementary school and a high school. This analysis assumes 31 percent of the students are high school students (assuming an even number of students per grade and 4 high school grades divided by a total of 13 grades). **Table 3** shows the parking requirements for the project.

Table 3: Parking Requirements

	Size ¹	Spaces Required	Number of Parking Spaces
Elementary School (69% of students attending)	24,504 s.f. (69% of total square footage)	1 space per 500 square feet	49
High School (31% of students attending)	62 students (31% of total students)	1 space per 10 students	6
Employees	15 employees	1 space per employee	15
Total Spaces			70

Notes: 1. Based on a total school square footage of 35,513 square feet, and 200 total students on campus at any given time.
Source: Traffic Works, 2018

As shown in **Table 3**, a minimum of 70 parking spaces are needed to adequately accommodate the project. As shown on **Figure 2**, the project would include 83 parking spaces for staff and students, more than the minimum required.

Trip Generation

Trip generation estimates for the proposed project were calculated based on average trip rates presented in the Institute of Transportation Engineers' (ITE) *Trip Generation Manual, 10th Edition*. The ITE land use 536 – Private School (K-12) was used, as this use best represents the proposed project with private automobile being the primary source of student arrival/departure. **Table 4** provides the Daily, AM, and Afternoon peak hour trip generation estimates for the proposed project. The Afternoon peak hour is between 2:00 PM and 4:00 PM when school is dismissed.

Table 4: Trip Generation Estimates

Land Use (ITE Code)	Size	Trips ¹						
		Daily	AM	AM In	AM Out	Afternoon	Afternoon In	Afternoon Out
Private School, K-12 (536)	200 students	496	162	99	63	116	49	67

Notes: 1. Based on the following trip generation rates presented in the Institute of Transportation Engineers' (ITE) *Trip Generation Manual, 10th Edition*: Daily – 2.48 trips per student; AM – 0.81 trips per student; PM – 0.58 trips per student
2. The Afternoon peak hour is between 2:00 PM and 4:00 PM when school is dismissed.

Source: Traffic Works, 2018

As shown in the table, the project would generate approximately 496 Daily, 162 AM peak hour, and 116 Afternoon peak hour trips.

Trip Distribution

Project generated traffic was distributed to the surrounding roadway network based on the location of the project in relation to complimentary land uses, major activity centers, and local roadway connections. The following trip distribution percentages were used:

- 20% to/from north on Pine Street
- 10% to/from east on Alma Street
- 30% to/from west on Lake Street
- 40% to/from east on Lake Street

The project trip distribution and assignment are shown on **Figure 4**.

EXISTING PLUS PROJECT CONDITIONS

Traffic Volumes

Existing Plus Project traffic volumes were developed by adding the project generated trips (**Figure 4**) to the existing traffic volumes (**Figure 3**) and are shown on **Figure 5**, attached.

Intersection Level of Service Analysis

Existing Plus Project intersection level of service analysis was performed using Synchro 9 software. The Existing Plus Project traffic volumes shown on **Figure 5**, as well as the existing peak hour factors were used in the analysis. **Table 5** shows the level of service results and the calculations sheets are provided in **Appendix B**.

Table 5: Existing Plus Project Conditions Intersection Level of Service

Intersection	Control	Existing				Existing Plus Project							
		AM		PM		AM		PM					
		Delay ¹	LOS	Delay ¹	LOS	Delay ¹	LOS	Delay ¹	LOS				
Cedar St/Ivy St	Side-Street STOP	No traffic added to this intersection under this scenario											
Eastbound Approach										8.8	A	9.0	A
Westbound Approach										8.7	A	8.7	A
Northbound Left										7.2	A	7.2	A
Southbound Left										7.2	A	7.2	A
Pine St/Ivy St	Side-Street STOP	9.7	A	10.8	B	10.3	A	11.6	B				
Eastbound Approach		12.3	B	12.2	B	14.2	B	13.5	B				
Westbound Approach		7.6	A	7.7	A	7.8	A	7.8	A				
Northbound Left		7.7	A	0	A	7.9	A	0	A				
Southbound Left													
Lake St/Pine St	Side-Street STOP	10.4	B	11.7	B	11.5	B	12.8	B				
Southbound Approach		8.0	A	8.5	A	8.2	A	8.7	A				
Eastbound Left													
Pine St/ South School Dwy	Side-Street STOP	NA				10.2	B	9.9	A				
Eastbound Approach						7.7	A	7.6	A				
Northbound Left													
Pine St/ School Drop-Off Entrance	Side-Street STOP												
Northbound Left		NA				7.7	A	7.5	A				

Notes: 1. Delay is reported in seconds per vehicle for the worst approach/movement for side-street stop controlled intersections.

Source: Traffic Works, 2018

As shown in the table, the study intersections and project driveways are expected to operate at acceptable levels of service under existing plus project conditions.

Cedar Street Access Alternative

If Cedar Street were to become a full access connection in the future, traffic volumes would change or increase at the Cedar Street / Ivy Street and Pine Street / Ivy Street intersections. Intersection level of service analysis was performed for this scenario assuming approximately 10 percent of vehicles would use Cedar Street instead of Pine Street. **Table 6** shows the level of service results for the Cedar Street / Ivy Street and Pine Street / Ivy Street intersections. Traffic volumes and level of service at the Lake Street / Pine Street intersection would not change, and volumes at the Pine Street driveway intersections would decrease, and therefore were not included the table.

Table 6: Existing Plus Project Conditions Intersection Level of Service

Intersection	Control	Existing				Existing Plus Project			
		AM		PM		AM		PM	
		Delay ¹	LOS	Delay ¹	LOS	Delay ¹	LOS	Delay ¹	LOS
Cedar St/Ivy St	Side-Street STOP								
Eastbound Approach		8.8	A	9.0	A	8.9	A	9.1	A
Westbound Approach		8.7	A	8.7	A	8.6	A	8.7	A
Northbound Left		7.2	A	7.2	A	7.2	A	7.2	A
Southbound Left		7.2	A	7.2	A	7.2	A	7.3	A
Pine St/Ivy St	Side-Street STOP								
Eastbound Approach		9.7	A	10.8	B	10.1	A	11.2	B
Westbound Approach		12.3	B	12.2	B	14.4	B	13.7	B
Northbound Left		7.6	A	7.7	A	7.8	A	7.8	A
Southbound Left		7.7	A	0	A	7.9	A	0	A

Notes: 1. Delay is reported in seconds per vehicle for the worst approach/movement for side-street stop controlled intersections.

Source: Traffic Works, 2018

As shown in the table, the Cedar Street / Ivy Street and Pine Street / Ivy Street intersections are expected to operate at acceptable levels of service if full access were provided to the project site via Cedar Street.

CEQA TRANSPORTATION IMPACT EVALUATION

The CEQA *Appendix G Environmental Checklist Form* was used to develop significance criteria for determining potential transportation impacts. The questions and answers below address the CEQA standard questions and other transportation related questions commonly asked in the review process.

Would the project:

Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

- The proposed project is not expected to conflict with any applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The study intersections are expected to operate at acceptable levels of service under Existing Plus Project conditions. This is considered a *less than significant impact*.

Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

- There is no congestion management program applicable to the study area roadways or intersections. The study intersections are expected to operate at acceptable levels of service under Existing Plus Project conditions. Therefore, this is considered a *less than significant impact*.

Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

- The project would not result in a change to air traffic patterns or a change in location for air traffic. Therefore, there would be *no impact*.

Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

- The project would include one full access driveway and one drop-off entrance on Pine Street, as well as an emergency access only connection on Cedar Street. Existing on-street parking on Pine Street would inhibit visibility for vehicles exiting the full access driveway. Therefore, the project proposes to construct red curb to prohibited parking 55 feet north of the driveway and 35 feet south of the driveway (see **Exhibit 2** on page 10). With this improvement, the project would have a *less than significant impact* regarding safety.

Result in inadequate emergency access?

- The project would include one full access driveway and one drop-off entrance on Pine Street, as well as an emergency access only connection on Cedar Street. Emergency access would be adequately provided with multiple points of ingress and egress to the site. Therefore, this impact is *less than significant*.

Conflict with adopted policies, plans, programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

- The project site is currently served by public transit with a stop on Pine Street at Mercy Hospital directly across from the project site. The study intersections, including the project driveways, are expected to operate at acceptable levels of service under Existing Plus Project conditions and therefore would not significantly impact transit service. Sidewalks are available throughout the majority of the project area and would not change with the project. The project is not expected to interfere with existing or planned multi-modal facilities. Therefore, this impact is *less than significant*.

Conflict with adopted parking standards?

- The question of adequate parking has been removed from the CEQA environmental checklist with recent CEQA revisions, as availability or lack of convenient parking is generally no longer considered an “environmental impact.” However, the project must still meet applicable City of Mount Shasta Code as a matter of project entitlement and permitting. The project would provide adequate parking supply in accordance with *Mount Shasta Municipal Code*. Therefore, this impact is considered *less than significant*.

Conflict with adopted policies regarding Vehicle Miles Travelled (VMT)?

- The City of Mount Shasta does not have any specific thresholds or significance criteria related to VMT at this time. Generally speaking, the City and State of California have goals of reducing VMT and Green House Gas emissions. The project would increase travel and therefore can be expected to increase VMT to some degree. VMT is simplistically calculated by multiplying the number of daily trips by the trip lengths. Since Mount Shasta does not have a travel demand model, it is difficult to ascertain or quantify the trip lengths to/from the proposed project relative to the trips and their length made to existing schools. The trip lengths may be shorter, longer, or very similar. To be conservative, it should be assumed that an increase in VMT is probable with the project. Since no threshold values have been adopted by the City related to VMT, this impact is considered *less than significant*.

CONCLUSIONS & RECOMMENDATIONS

The following is a list of key findings and recommendations:

Proposed Project: The project consists of a charter school serving Kindergarten through 12th Grade with approximately 350 students and 30 staff. However, due to intentional scheduling only 200 students and 15 staff will be on site at any one time. The analysis is based on the latter numbers.

Project Trips: The project is anticipated to generate 496 Daily, 162 AM peak hour, and 116 Afternoon peak hour (when school is dismissed) trips.

Project Access: The proposed project includes one full access driveway and one drop-off entrance on Pine Street, as well as an emergency access only connection on Cedar Street. The full access driveway on Pine Street also serves as the exit for the student drop-off zone. Existing on-street parking on Pine Street would inhibit visibility for vehicles exiting the full access driveway; therefore, the project proposes to prohibit parking 55 feet north and 35 feet south of the south driveway by painting red curb to provide adequate sight lines (see **Exhibit 2** on page 10). Additionally, Cedar Street is currently approximately 15 feet wide where the project would connect, which is adequate for emergency access, but if the roadway were to become a full access connection in the future, half-street improvements would be needed to widen the roadway for two-way travel.

Existing Level of Service: The study intersections currently operate at acceptable levels of service during the AM and Afternoon peak hours.

Existing Plus Project Level of Service: The study intersections and project driveways are expected to operate at acceptable levels of service with project generated traffic during the AM and Afternoon peak hours.

School Zone: The project proposes to implement a “school zone” in accordance with the Chapter 7 of the CA MUTCD.

Impact Evaluation: The project is not anticipated to cause any significant traffic impacts.