


CITY OF REDDING
REPORT TO THE PLANNING COMMISSION

ITEM NO.	4c(1)
MEETING DATE	4-29-10
APPROVED BY	
STAFF AUTHOR	
PLANNING MANAGER	

DATE: April 19, 2010

CODE: S-101-135/L-010-230/L-010-211-043

FROM: Jim Hamilton, Development Services Director

SUBJECT: Salt Creek Heights Subdivision/Planned
Development (S-15-07, PD-11-07, RZ-6-07)
Field Trip

BACKGROUND

In 2009, the Planning Commission was apprised of the proposed Salt Creek Heights Subdivision/Planned Development (Project) through consideration of, and the conduct of, a public hearing on a draft environmental impact report prepared for the Project. It is anticipated that the Project application will come before the Planning Commission (Commission) in May. In view of the scale of the Project, 440 residential units on 272 acres, and geography of hilly terrain above the Sacramento River and Salt Creek, a Commission field trip to the Project site has been scheduled as the last item of today's meeting. For reference while on the site, two large maps are attached: (1) an aerial photograph, with an overlay of the subdivision proposal, and (2) a topography map illustrating 20 percent slope areas, with an overlay of the subdivision proposal.

This staff report also serves as transmittal of the Final EIR prepared for the Project. Formal consideration of the Final EIR will be before the Commission at a subsequent public hearing scheduled for the Project. The Final EIR consists of an Executive Summary, Comments/Responses to the Draft EIR, an Errata containing corrections and minor revisions to the Draft and the Mitigation Monitoring Program. The Commission will recall from its review of the Draft EIR, that the document addresses the full range of environmental issues typically associated with a large residential project. The primary issues presented by Salt Creek Heights are in the area of traffic circulation, water quality and biological impacts, and fire safety. The Final EIR concludes that with practical mitigations identified in the document, all potential impacts to the environment associated with the Project will be below a level of significance. These mitigations are delineated in Section 8 of the Final EIR.

ISSUES

The main purpose of the field trip is to provide the Commission a clear picture of the physical characteristics of the Project site as a basis for considering the proposed subdivision design and related issues. The field trip is not a public hearing, although the applicant will be present and members of the public may attend. The Commission will not take a vote or make any decisions. Therefore, discussion should be kept to a minimum, and the Commission should not provide insights concerning its potential decision on the project. However, staff can answer questions to clarify the project design or issues.

In particular, staff will point out the location of what staff is identifying as "outpads," which are twelve lots isolated to varying degrees from the main body of the development and primarily surrounded by open space. The outpads are numbered as Lots 333 through 344 on the tentative map.

Focus is placed on these lots, since, in staff's opinion, they present an issue of conformance with General Plan "Greenway" policy. Basic background on the issue is provided below.

GENERAL PLAN "GREENWAY"

The outpads are located in area depicted as "Greenway" on the General Plan Land Use Diagram. The General Plan defines "Greenway" as "*natural open space and includes slopes in excess of 20 percent and the 100-year floodplain of the Sacramento River and its tributary creeks and streams.*" The definition goes on to state that ". . . *Because of the inherent dangers to life and property and irrevocable damage to the natural environment, these natural land and water areas should not be urbanized or significantly altered. . . These natural areas are an important local resource and serve as places in which flora or fauna can be maintained in its natural state . . . provide relief from urbanization, reduce siltation from excessive grading, buffer various land use activities, and . . . are an important visual resource. . . .*"

The "Greenway" General Plan classification has been in existence since 1970 and, in general, has been applied to limit development on steep slopes (defined as being in excess of 20 percent) and in floodplains. Since 1970, creation of lots entirely within a steep-slope greenway has not been supported by the staff or the Commission. Some amount of grading on 20 percent slopes has been approved to facilitate practical or efficient subdivision design. This typically has occurred in small isolated pockets of steep slope at the head of ravines or the outer edge of narrow ridgetops. Such minor encroachments have been permitted to accommodate installation of infrastructure, provide efficient lot layout, ensure proper drainage, balance cut and fill, or as an alternative to protect larger, more contiguous open-space areas. More simply stated, preservation of small areas of steep slope which are not contiguous to a larger area of "significant" greenway would be impractical and counterproductive to meeting other General Plan goals. Alternately, development of areas that are less than 20 percent, otherwise surrounded by greenway, diminishes the value of greenway preservation.

Attachment "D" illustrates how past practice of allowing slope encroachments may apply to the Salt Creek Heights proposal by depicting those areas within lot boundaries (not including the outpads) that have 20 percent slope or greater. The total area of steep-slope encroachment for the project is in excess of five acres, and facilitates the development of approximately 75 lots and some number of apartments.

GREENWAY POLICY INTERPRETATION 2001-3

The 2000 General Plan update reaffirmed the importance of the "Greenway" classification and the manner in which it had been historically applied through the inclusion of several policies in the Community Development and Design Element and Natural Resource Element. The backbone of the policy directive is found in Policy CDD3A as follows:

*Policy CDD3A: Prohibit development in natural floodplains or on hillsides with slope areas exceeding 20 percent. **Minor** (emphasis added) encroachments into these areas for new developments may be authorized without a General Plan amendment if necessary to facilitate installation of infrastructure, provide emergency-access opportunities, or otherwise facilitate construction of the project as approved by the City.*

This policy clearly provides for encroachment into steep-slope areas to: (1) provide appropriate flexibility for varying development constraints and scenarios and (2) reflect the practical application of the "Greenway" restrictions as they have been applied since 1970.

In 2001, the Planning Commission adopted General Plan Policy Interpretation 2001-3, *Permissible Grading and Development on Slopes Exceeding 20 Percent* (Attachment "B"), to provide greater guidance as to acceptable development practices in steep-slope areas under the "minor encroachment" language of Policy CDD3A. After describing the background for encroachments into steep slopes to support development infrastructure and overall design, the policy focuses on the circumstances where steep-slope encroachment can be allowed to facilitate creation of lots. Three lot scenarios are addressed: (1) *Greenway Lots Prohibited*, (2) *Combination Lots*, and (3) *Pad Grading*.

The Salt Creek Heights outpads fall under the *Combination Lot* type. These lots are 80-foot by 80-foot building envelopes containing some amount of land area both less than, and in excess of, 20 percent slope. The policy interpretation provides specific criteria under which approval of such combination lots would be appropriate. The key elements of the criteria are:

- Each lot should have a minimum developable area (less than 20 percent slope) of 2,500 square feet.
- The developable area should have an average depth of 30 feet and a width of 60 feet.
- The developable area shall be in reasonable proximity to the street and should not require access across lands with slopes in excess of 20 percent.
- The building floor area encroaching into areas of 20 percent slope should not exceed 30 percent of the building.
- Stem wall or similar construction shall be utilized for any portions of the structure that will encroach onto 20 percent slopes.

Policy 2001-3 emanated from development proposals under review at the time that either: (1) proposed fill on the sides of narrow ridgetops to create lots on both sides of a street running down the middle of the ridge (Country Heights Subdivision) or (2) proposed grading on the edges of large pockets of developable area surrounded by steep slopes in order to concentrate lot development and avoid disturbance of other smaller and scattered developable areas (Bel Air Estates). The Salt Creek Heights outpads represent a significantly more aggressive encroachment into the greenway area than these scenarios.

OUTPAD ANALYSIS

To assess the Salt Creek Heights outpads in light of the guidance provided by the Commission-adopted policy interpretation, staff developed the attached matrix evaluating each pad's consistency with the policy criteria for a combination lot (Attachment "B").

In summary, it is staff's opinion that the "Greenway" Policy **may support** six of the outpads (**Lots 333, 334, 340, 342, 343, and 344**), and **does not support** six others, **Lots 335, 336, 337, 338, 339, and 341**. As demonstrated by the matrix, to varying degrees all the outpads fall outside strict application of one or another criteria of Policy Interpretation 2001-3. For example, all of the outpads require driveway grading across areas of 20 percent slope, and it could be argued that none are in reasonable proximity to the streets. However, the language of the policy is inherently flexible to allow the approving body some discretion in evaluating specific project conditions and the reasonableness of the request. Staff's lack of support for the six outpads noted above is based upon the extent of deviation from the policy criteria and what staff believes is a direct lack of conformance with the definition and purpose of the "Greenway" designation as presented in the General Plan.

Generally, these six lots are those that are located farthest away from the main area of development, and thus:

1. Encroach deep into the surrounding greenway area, diminishing the continuity benefits of uninterrupted open space.
2. Extend the required fire-fuel clearing well beyond that needed for the main body of development. Attachment "E" illustrates that these six outpads will necessitate an additional 17 acres of clearing on that portion of the site closest to Salt Creek. In fact, clearing for Lots 335, 339, and 341 extends the clearing to the creek or its main tributary. This exhibit is based upon the City's standard mitigation requiring clearing within 200 feet of the building pad; the applicant has submitted a project-specific fire-hazard study indicating that 130 feet of clearing is sufficient. The Fire Marshal has not yet concurred with the analysis. The project EIR identifies appropriate clearing techniques should clearing need to occur in close proximity to the creek.
3. The lengths of the driveways necessitate significant grading within the areas of 20 percent slope. Substantially more earth disturbance will occur to construct the driveways than to develop the pads, again diminishing the benefits of continuous open-space area. The driveways also necessitate fire-fuel clearing within 30 feet of each side. As shown in the matrix, the width of grading on 20 percent slopes necessary to construct five of the driveways ranges between 70 and 85 feet.

Staff has identified for the applicant alternate locations closer to the body of development for Lots 336, 338, and 339 that could be consistent with the policy.

In turn, the six outpads that staff believes are supported by the policy criteria are those that are:

1. In reasonable proximity to the body of development (between 230-350 feet of separation).
2. Have the greatest amount of developable area at less than 20 percent slope.
3. Propose driveway encroachment into 20 percent slope area to a degree consistent with past practice (i.e., head of a ravine, edge of ridgetop).

4. Do not necessitate excessive additional fire-fuel clearing directly above Salt Creek.
5. Of note, staff supports Lot 334 although it has a lengthy driveway including a segment through 20 percent slope. Staff's support is based upon the fact that the entire length of the driveway has already been cleared and disturbed through maintenance of the underlying power-line easement.

CONCLUSIONS AND RECOMMENDATION

When the Project is brought before the Planning Commission for consideration and recommendation to the City Council, a determination of the Project's consistency with the General Plan must be made. The above information is provided in conjunction with the field trip to allow the Commission to visualize the General Plan "Greenway" policy while "on the ground" and allow ample time for consideration. Please remember to wear sturdy shoes; we will be walking through some rocky (and perhaps wet) areas.

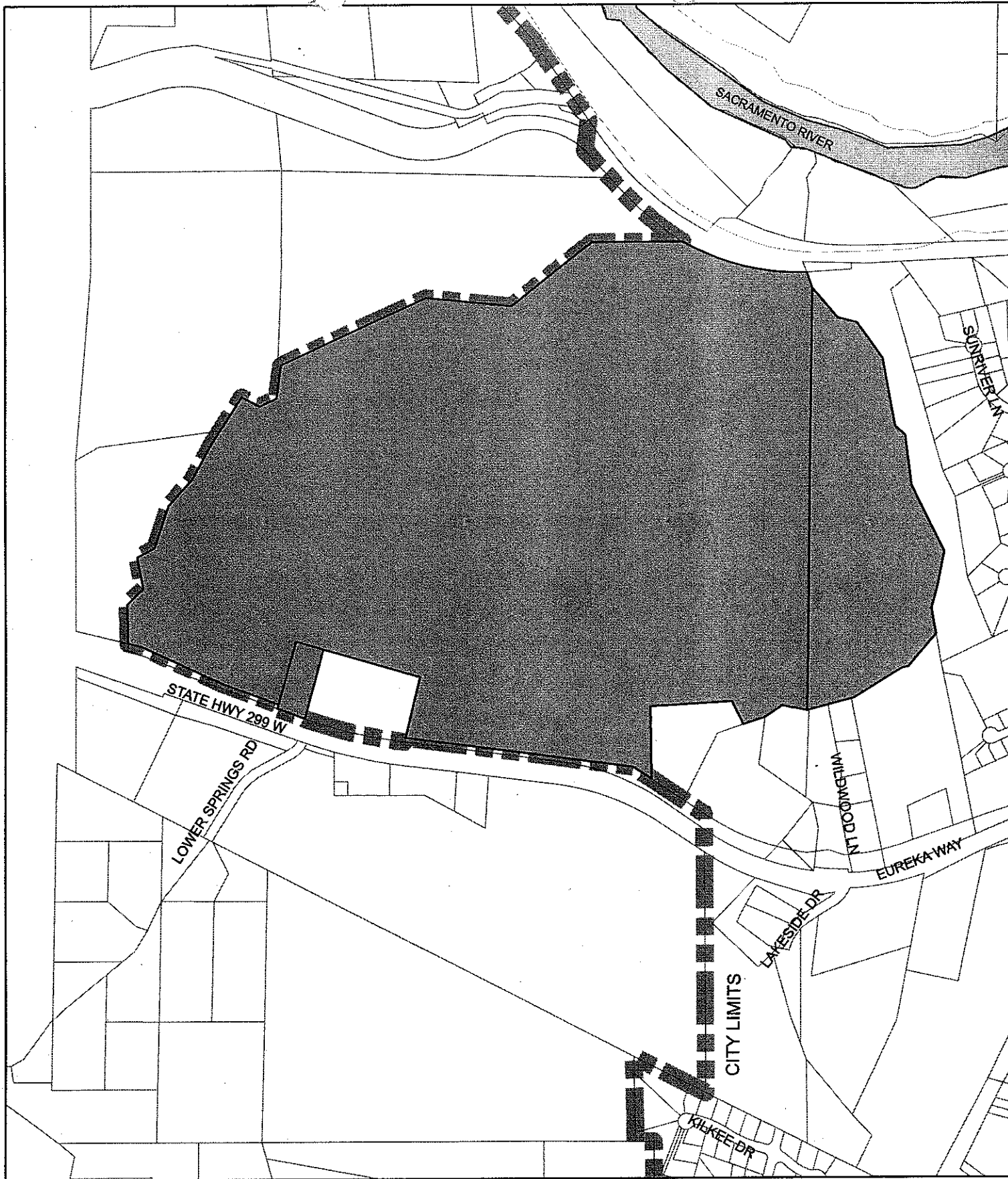
ATTACHMENTS

- A. Location map
- B. General Plan Policy Interpretation 2001-3
- C. General Plan Policy Interpretation 2001-3 matrix
- D. 20 percent slope encroachments
- E. Fire fuel-clearing boundary
- F. Tentative map/aerial
- G. Tentative map/topography
- H. Final EIR

DD:el

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c: Gary Blanc, Sierra Pacific Industries



	GIS DIVISION DEVELOPMENT SERVICES DEPARTMENT	LOCATION MAP S-15-07 \ PD-11-07 \ RZ-06-07 SALT CREEK HEIGHTS SUBDIVISION 4402, 4350 & 4504 EUREKA WAY AP# 204-030-036, 027 & 023	MTG. DATE: 4-29-10
	DATE PRODUCED: MAY 7, 2008		ITEM: 4c(1)
		ATTACHMENT: A	
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**CITY OF REDDING, CALIFORNIA
PLANNING COMMISSION INTERPRETATION**

SUBJECT	INTERPRETATION NUMBER	DATE OF ACTION	PAGE
GENERAL PLAN — PERMISSIBLE GRADING AND DEVELOPMENT ON SLOPES EXCEEDING 20 PERCENT	2001-3	10-23-01	1 of 2

BACKGROUND

The General Plan includes several policies that address development on slopes exceeding 20 percent and the need to provide well-designed and logical infrastructure systems. These slope areas are defined as "Greenway," and the General Plan indicates that they should be altered only in limited circumstances. The General Plan does not provide specific guidance on what constitutes "significant" alteration of slope areas, nor does it specifically address creation of lots that are partially or entirely encumbered by slopes of more than 20 percent. As the City continues to grow, there will be increasing pressure to develop on the difficult terrain found in West Redding and the Quartz Hill Road area as well as other locations. Development in such terrain inevitably requires some alteration of steep-slope areas to facilitate street construction and installation of utilities. As this grading occurs, there will be opportunities to grade additional areas to facilitate lot grading and reduce construction costs. Clarification of General Plan policy is needed to provide guidance to the public prior to preparation of development plans on areas encumbered by steep slopes. For purposes of this interpretation, "developable area" means that portion of a property that slopes less than 20 percent.

PURPOSE

Since an update of the Zoning Ordinance and Subdivision Ordinance has not been completed, an interpretation of General Plan policies is necessary to clarify the circumstances under which the creation of lots and/or grading may occur in steep-slope areas which meet the General Plan definition of "Greenway."

INTERPRETATION

The General Plan allows encroachment into "Greenway" areas ". . . as necessary to facilitate installation of infrastructure, provide emergency-access opportunities, or otherwise facilitate construction of the project as approved by the City" (Policy CDD3A). This suggests that certain flexibility is inherent in project design, approval, and construction. However, it is also clear that a "Greenway" ". . . should not be urbanized or significantly altered" ("Greenway" land use classification definition). As such, the following should be applied as a guide in development on slopes exceeding 20 percent.

Greenway Lots Prohibited

No lot shall be created whose land area is totally encumbered by slopes of more than 20 percent except when approved by the Planning Commission pursuant to Chapters 17.04, *General Provisions*, and 17.44, *Modifications of Provisions*, of the Subdivision Ordinance.

Combination Lots

Lots that are partially encumbered by slopes of 20 percent or greater may be created provided that the minimum area and configuration criteria below are met.

1. *Minimum Developable Area.* Each new lot created should have a minimum developable area of 2,500 square feet. The developable area of a lot should have an average depth of 30 feet and a width of 60 feet, as measured perpendicular to the property lines. Said area shall be in reasonable proximity of the street and should not require driveway access across lands with slopes in excess of 20 percent.

**CITY OF REDDING, CALIFORNIA
PLANNING COMMISSION INTERPRETATION**

SUBJECT	INTERPRETATION NUMBER	DATE OF ACTION	PAGE
GENERAL PLAN — PERMISSIBLE GRADING AND DEVELOPMENT ON SLOPES EXCEEDING 20 PERCENT	2001-3	10-23-01	2 of 2

INTERPRETATION (continued)

2. *Construction Techniques.* Stem wall or similar construction shall be utilized for any portions of the structure that will encroach on slopes of 20 percent or greater.
3. *Maximum Encroachment—Floor Area Limitation.* The maximum building floor area encroaching into areas of 20 percent slope or greater should not exceed 30 percent of the building.
4. *Compliance with Applicable Standards.* Buildings encroaching into steep-slope areas shall comply with all applicable development standards.

Pad Grading Provisions

Subdivision grading activities intended solely to create a pad for lot development are not permitted on slopes in excess of 20 percent except when approved by the Planning Commission pursuant to Chapters 17.04, *General Provisions*, and 17.44, *Modifications of Provisions*, of the Subdivision Ordinance and the following criteria can be satisfied:

- ▶ The placement of fill material (if any) will reduce the environmental impacts associated with disposing of the material at another location off site or within the project area.
- ▶ The visual impact of the grading from public streets or surrounding properties is minimized through contour grading, stepped slopes with plantings, or other appropriate techniques.
- ▶ The fill/cut area is necessary as part of an approved parcel map, subdivision map, or infrastructure improvement necessary to support an approved development.
- ▶ The depth of fill or height of cut necessary to create a building pad shall be the minimum necessary to meet the requirements of these criteria and all applicable development standards.

Permit Required

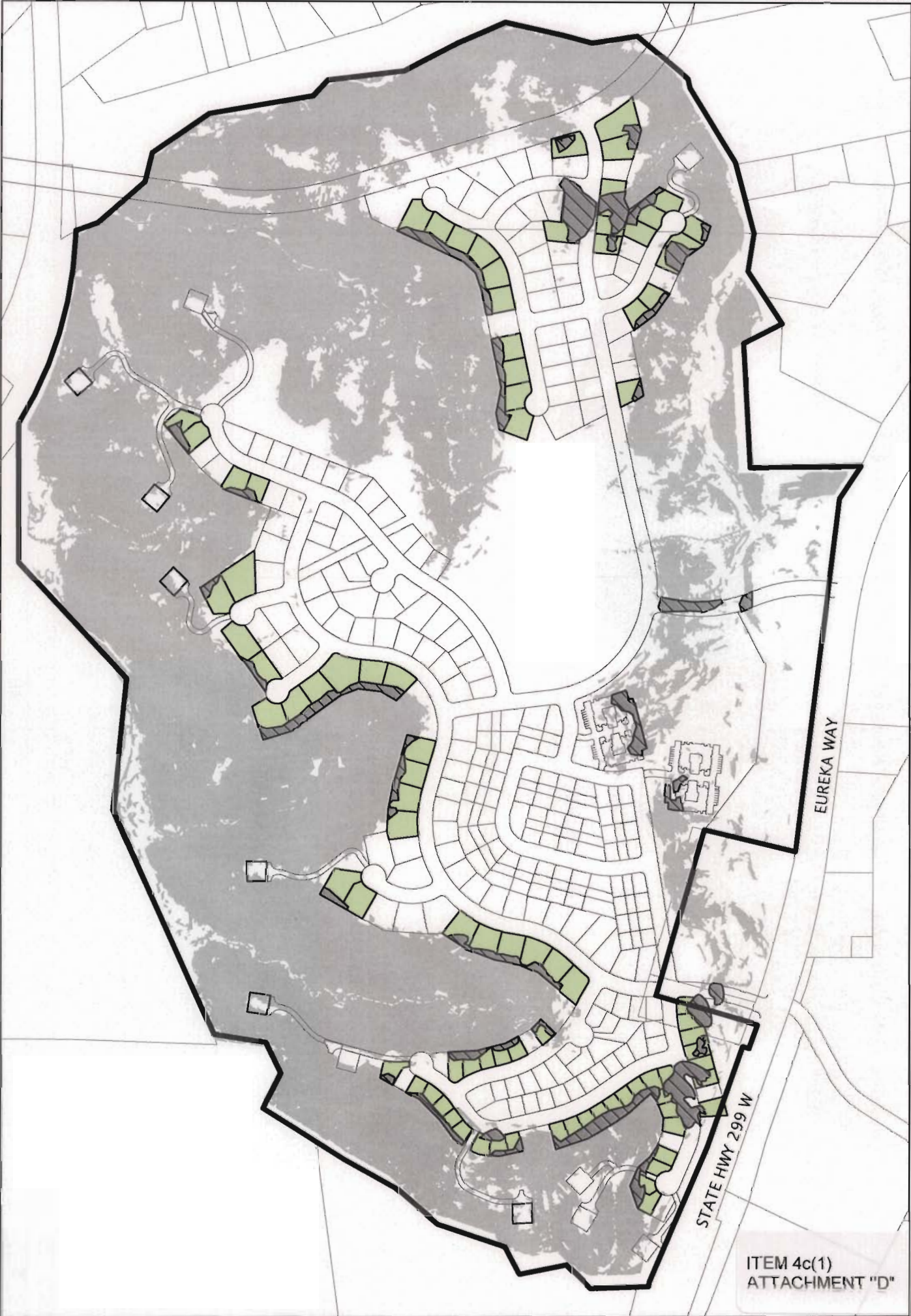
All permits and other approvals required by the Zoning Ordinance and Subdivision Ordinance shall be obtained prior to the commencement of construction or grading.

GREENWAY IMPACT MATRIX OUT PAD ANALYSIS

Out Pad	Area of Pad Less Than 20%	Driveway Grade	Driveway Length	Lineal Feet of 20%+ Slope Disturbed by Driveway	Width of 20%+ Slope Disturbance From Driveway Cut & Fill (At Widest Point)	Distance of Out Pad From Street	Elevation Difference From Street	Setback From Salt Creek/Gold Run Creek	Supported By Policy CCD 3A
333	3,840	10%	330'	130'	55'	170'	25'	N/A	YES
340	4,400	11%	240'	240	40'	205'	25'	225	YES
342	6,300	10%	280'	170	55'	248'	6'	* 290'	YES
343	5,600	10%	350'	150'	50'	265'	8'	* 170	YES
344	4,800	10%	230'	10'	10'	185'	12'	* 90	YES
334	3,600	12%	530	135'	100	365'	60	215	YES
335	4,400	18%	630	185	72	455'	102	230'	NO
336	3,200	10%	515	150'	70	270	48	490'	NO
337	2,400	12%	350'	190	75	210'	39	370'	NO
338	4,160	12%	450	100'	80	385	52	390'	NO
339	2,800	15%	610	570	85	610	84	110	NO
341	4,800	12%	500	160	50'	285	35'	* 110	NO

■ Represents being one of the top 6 lots having the most intensive impact within the subject category.

* Tributary to Salt Creek



ITEM 4c(1)
ATTACHMENT "D"

- Legend**
- 20% Slope
 - Proposed lots which include 20% slope area
 - 20% Slope within lot/street area (6 acres +/-)
 - Outpads
 - Property line

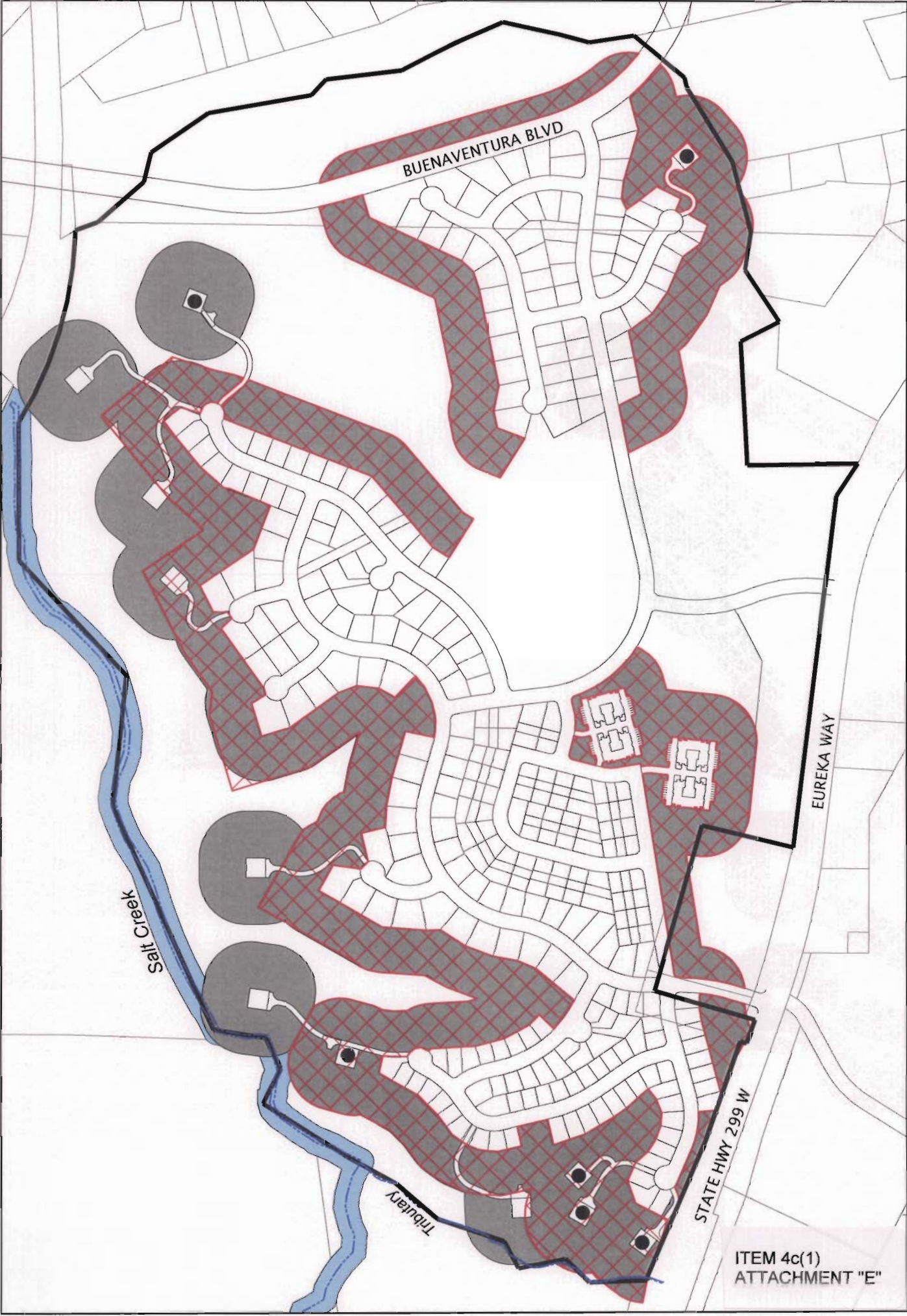
Salt Creek Heights

20 Percent Slope

April 21, 2010

Features and boundaries depicted are approximate only.

0 250 500 Feet



Fuel Management Clearing

- Policy supported outpads
- ▨ 70 acres - Policy supported clearing
- 87 acres - Total clearing
- Property line
- Salt creek corridor
- ▬ Salt creek corridor setback

Salt Creek Heights
Fire Fuel Reduction

ITEM 4c(1)
ATTACHMENT "E"

February 16, 2010
Features and boundaries depicted are approximate only.

0 250 500 Feet