

# ATTACHMENT 5

## REVISED - Comments and Responses on the Clay Street at Main Street/Cedar Ravine Realignment and Clay Street Bridge at Hangtown Creek Replacement Project Initial Study/Mitigated Negative Declaration

The comments and responses are organized as follows:

- Section 1, Summary of Comments
- Section 2, Comment Letters and Responses

This document was revised to include a letter from Mr. David Price, received by the City of Placerville on October 14, 2010.

## Section 1. Summary of Comments

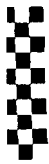
Table 1 lists the names of the individuals, organizations, and agencies that provided comments on the Initial Study/Mitigated Negative Declaration. Each comment is briefly summarized to provide an overview of the nature of the comments, concerns, or issues raised. The actual comment submissions and corresponding responses follow Table 1.

**Table 1. Summary of Comments Received on the Initial Study/Mitigated Negative Declaration**

Name	Comment No.	Comment Summary
Mitchner, Darlene	1	Considers the roundabout to be inappropriate for Placerville and concerned about the Farmers' Market
	2	Considers Clay Street Bridge historical
	3	Expresses concern that a roundabout will increase traffic congestion
	4	Expresses concern about the compatibility of the roundabout with historic districts
	5	Expresses concern about loss of parking spaces and tourist friendly atmosphere
McCaslin, Sharlene	1	Requests that the historic districts outside the project limits are discussed
	2	Considers Clay Street Bridge historical
	3	Requests that the Lincoln Highway be discussed
	4	Expresses concern about the compatibility of the roundabout with historic districts
	5	Describes other bridges that have been replaced. Concerned that the Caltrans Maintenance report which identified the bridge as not being historical was in error.
	6	Describes the bridge structure type and history; considers the bridge to be in a "Special Category";
	7	Comments on the findings of the Caltrans Bridge Inspection Report 2006.
	8	Comments the Draft Project Report
	9	Asks why the Environmental Report did not evaluate alternatives. Suggests four alternatives.
State Parks	1	Acknowledges the letter is being submitted after the comment period ended
	2	States the project would have a significant adverse impact if the Clay Street bridge is a significant historic resource
	3	Describes when an Environmental Impact Report is needed and asks for an evaluation of the significance of the bridge.
	4	Calls attention that the National Register criteria is not the appropriate regulatory framework for the purposes of CEQA. and the California Register criteria.
State Clearinghouse	1	Documents that no state agencies submitted comments during the review period and that the City has complied with the State Clearinghouse review requirements for draft environmental documents.

Name	Comment No.	Comment Summary
David Price	1	Considers the project description to be inconsistent
	2	States the purpose of the project, the problems to be solved and the benefits are not described
	3	Discusses the traffic analysis and concludes the project intensifies traffic
	4	Considers the loss of a handicapped accessible landscaped area to be significant
	5	Considers the loss of parking spaces in the Ivy House Parking Lot and on Pacific Street to be significant
	6	Considers the loss of the bridge and impacts to an historic area and streetscapes to be significant
	7	Questions the rationale for a roundabout design
	8	Raises concerns about emergency responders and large vehicle circulation patterns in the roundabout
	9	Comments about hazardous substances and/or petroleum products
	10	Comments that analysis of growth inducing impacts is missing from the document
	11	Asserts that the project will induce additional traffic
	12	Asserts the environmental document should address the cumulative impacts of the Cottonwood Park Planned Development Phases 4 & 6
	13	Asserts that the project results in massive tree removal which is not adequately mitigated and that invasive plant abatement should be discussed
	14	Discusses historic properties, including Main Street
	15	Questions the relationship of the El Dorado Trail extension with other project components
	16	Asserts the roundabout is counter to encouraging alternative forms of transportation
	17	Discusses the public involvement process
	18	Summarizes the letter and suggests building additional parking, the El Dorado Trail extension, and performing maintenance activities as an alternative to the project

## **Section 2. Responses to Comments**



Darlene J. Mitchener  
1155 Elm Avenue  
Placerville, California  
95667-4747

RECEIVED  
OCT 12 2010  
ENGINEERING DIVISION  
City of Placerville  
City of Placerville

October 11, 2010

Mr. Randy Pesses  
Public Works Director  
City of Placerville  
3101 Center Street  
Placerville, California 95667

RE: Proposed Roundabout/Clay Street Project

Dear Mr. Pesses:

I wish to express my strong opposition to the City of Placerville's plan to construct a traffic roundabout at the intersection of Cedar Ravine Road and Main Street. A roundabout is totally inappropriate in our historic town and would destroy the Ivy House Parking Lot where the citizens of this town enjoy the weekly Farmers' Market as well as public parking. I am also deeply disappointed to learn that the City plans to demolish the historical Clay Street Bridge so they can build another cookie-cutter bridge to match the other out-of-place bridges along Main Street over Hangtown Creek.

A traffic roundabout will only add to the traffic congestion. Motorists still need to stop when traveling one block either way; there are stop signs at Bedford and at Broadway. A car making a left turn into the new Castle restaurant will back up traffic into the potential roundabout.


The location of the proposed roundabout project is at the edge of the Main Street historic district and historic bed and breakfast establishments on Clay and Cedar Ravine. Is this what we want visitors to see when they come to Placerville to spend their money? The proposed project will take away much needed parking spaces, only adding to the frustration of tourists who will then go somewhere else where they will feel more welcomed. The proposed roundabout will have a negative effect on the businesses adjacent to the project, both during construction and after, due to lack of parking and unsafe pedestrian conditions.

Placerville is a small town and there is a need for traffic to slow and stop, when necessary, for foot traffic. We want to encourage people to push their strollers and walk their dogs safely downtown. We want visitors to drive slowly through and decide to stop because it looks like a great place to relax or shop.

I believe greed leads many of the recent projects and proposed plans of our city. I moved here because it was away from all the big city mess. I think the elected officials of this city have lost sight of the fact that they are public servants. They have also forgotten that tourism is the main revenue generating factor in Placerville. I am shocked and appalled by some of the recent changes. Placerville is rapidly losing its historic quality, as well as its natural beauty. The officials would do well to listen to those they serve.

I appreciate your attention to these comments. Please contact me at (530) 344-1222 if you have any questions. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Darlene J. Mitchener". The signature is written in black ink and is positioned above the printed name.

Darlene J. Mitchener

## Response: Mitchener, Darlene

### *Mitchener-1*

The City of Placerville determined that a 4-legged roundabout is an appropriate intersection for Main Street/Clay Street/Cedar Ravine when it adopted the Main Street Streetscape Design Development Plan (Hyden 2005).

The Farmers' Market would relocate during the construction of the project. During the Planning Commission hearing on October 19, 2010, the Public Works Director stated that the loss of parking would be mitigated before construction temporarily closed the Ivy House Parking lot. The Farmers' Market could relocate to the replacement parking area.

### *Mitchener-2*

The Clay Street Bridge, though it is 70 years old having been constructed in 1940, is not an historic resource for the purposes of CEQA. To be a historic resource under CEQA, the bridge would need to be listed or eligible for listing in the California Register of Historical Resources (CEQA Guidelines 21084.1). The bridge is not eligible for listing on the California Register.

The Clay Street bridge, constructed in 1940, was past the time of significance for the development and of concrete reinforced arch bridges, which was 1890 to 1920. By 1940, the bridge type was considered obsolete. The technology for bridge designs rapidly evolved in the early 20<sup>th</sup> century to create less expensive, lighter weight, concrete reinforced bridges. As a late example of an obsolete bridge type, the Clay Street bridge does not have the potential to yield significant scientific or historical information about the evolution of reinforced, closed spandrel arch bridges.

The bridge is not listed in or determined to be eligible by the State Historical Resources Commission (CEQA Guidelines 15064.5(a)(1)). The bridge is not listed in a local register of historical resources (CEQA Guidelines 15064.5(a)(2)). The bridge is not associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage (CEQA Guidelines 15064.5(a)(3)(A)). The bridge is not associated with the lives of persons important in California's past (CEQA Guidelines 15064.5(a)(3)(B)). The bridge does not embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possesses high artistic values (CEQA Guidelines 15064.5(a)(3)(C)). The bridge has not yielded, nor is it likely to yield, information important in history (CEQA Guidelines 15064.5(a)(3)(D)).

### *Mitchener-3*

A traffic analysis was performed for the Cedar Ravine Road/ Main Street intersection that evaluated the roundabout alternatives and a conventional signalized intersection. The signalized intersection did not perform as well as the roundabout.

Should the City leave the Cedar Ravine Road/ Main Street and Clay Street/ Main Street as they are today, future traffic projections show that the Cedar Ravine Road/ Main Street intersection would attain a LOS C during AM hours and a LOS F during PM hours. The Clay Street/ Main Street intersection would attain a LOS F during both AM and PM hours.

*Mitchener-4*

The project area is not in an historic district. The City of Placerville determined that a 4-legged roundabout is an appropriate intersection for Main Street/Clay Street/Cedar Ravine when it adopted the Main Street Streetscape Design Development Plan (Hyden 2005).

*Mitchener-5*

The loss of off-street public parking capacity was identified as an impact of the project. The implementation of Mitigation Measure 6.1 mitigates the loss of parking.

**Sharlene S. McCaslin**

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916-804-4435  
sharlene.mccaslin@sbcglobal.net

October 13, 2010

RECEIVED

OCT 12 2010

ENGINEERING DIVISION  
City of Placerville

Mr. Randy Pesses  
Public Works Director  
City of Placerville  
3101 Center Street, 3<sup>rd</sup> Floor  
Placerville, CA 95667

Re: Comments on Mitigated Negative Declaration for the Clay Street Realignment, Bridge Replacement and Clay Street/Cedar Ravine/Main Street Roundabout Project

#### CLAY STREET BRIDGE AND OTHER HISTORICAL RESOURCES

This section of commentary focuses on the issues mentioned in the Mitigated Negative Declaration, Surrounding Land Uses and Setting, which states, in part, "U.S. Highway 50 occurs to the north, small business occur along Main Street to the east and west, and small businesses and residential housing occur to the south."

*What is missing from this statement is that north of Highway 50 is a locally designated residential **historic district**, **historic commercial properties** occur along Main Street to the south and west, and another locally designated residential **historic district** occurs to the south. Also missing is the fact that the Clay Street Bridge, while not listed on the California Register or the National Register of Historic Places, is nonetheless, eligible for listing, and as such, must be considered as a significant resource in the project area. In addition, the report doesn't address the fact that the Lincoln Highway is beneath Main Street and must also be protected. The Main Street overlay project was funded with preservation grant funds with the provision that the Lincoln Highway would be preserved in place.*

The Environmental report does not adequately address any of the historical and cultural resources located within or adjacent to the project area. It does acknowledge the historic Druid Monument, but goes on to state "No other historical resources would be affected by the project." According to CEQA guidelines a resource does not need to have been identified previously either through listing or survey, it only needs to be "potentially eligible," to be considered significant. The construction of a modern roundabout, realignment of Clay Street through the Ivy House Parking Lot and replacement of the historic Clay Street Bridge will create

an intrusion into and cause a significant adverse effect to this historic area and to the streetscape views.

The location of the project is adjoining two of the City's residential historic districts and the proposed downtown historic district overlay zone, and would only serve to bisect the historic areas of the City. The businesses located at the Main Street and Clay Street intersection are all housed in historic buildings, including Sweetie Pies Restaurant, Lofty Lou's Yarn Shop, Bob Darling Photography, Cozmic Café and Empress Clothing in the Pearson Soda Works Building. In fact, the original Area of Potential Effects (APE) was modified early in the process to eliminate portions of the APE located along Clay and Pacific Streets and the southwest corner of Main Street and Cedar Ravine Road "to avoid several historic period cultural resources." (Draft Archaeological Survey Report, Summary of Findings, page I, which shows intent to ignore the historical and cultural resources of the area adjacent to and surrounding the project area in violation of CEQA regulations.)

The historic Clay Street Bridge over Hangtown Creek is the last remaining old bridge connecting the historic downtown area with the historic properties north of Highway 50. When Highway 50 was constructed in the early 1950's it cut through and separated downtown Placerville from all residential and commercial properties to the north. The construction of pedestrian overcrossings allowed pedestrians to access downtown at two points, but no vehicle traffic can travel from downtown to the areas north of Highway 50 without using Highway 50's signalized intersections.

The project itself appears to be either a moving target, or a work in process. The City of Placerville Main Street Streetscape Design Development Plan states, on the very first page "preservation and enhancement of Main Street's unique character is key to Downtown's continued retail success." It goes on to list the first of three underpinning objectives as "preserve and enhance the historical character and assets of Downtown." One should note that none of the individuals who contributed to the Main Street Streetscape Design Development Plan is an historian or preservationist.

The roundabout section of the Development Plan indicates "with the additional modifications in this plan it will become a public space (for both automobile and pedestrian) that will be a source of community wealth and pride equaling the Bell Tower Plaza" and "Given the myriad of benefits from a safety, function, and aesthetic standpoint that a roundabout offers, *it is well worth the loss of two parking spaces and an area equal to an 18ft by 18 ft patch of asphalt.*" If that were true, you could very nearly fit a traffic roundabout in my front parlor!

It is important to note that bridges that are within or near historic districts have the potential to gain significance, beyond the significance level identified when considering the bridge alone, and to be a contributing element of the historic district and/or historic landscapes. A new roundabout and bridge, built in the proposed Main Street Streetscape Design style, which is in no way historic looking, would introduce a "new intrusion" in this historic area of Placerville, and would no longer convey a sense of the historic environment.

The old bridges at Canal Street, Spring Street and Bedford Avenue were all recently demolished and rebuilt during the Highway 50 Operational Improvement Project. The bridge at Blairs Lane is also scheduled for demolition. The bridge at Locust Avenue has lost integrity due to the damage it has sustained. The Clay Street Bridge over Hangtown Creek was built in 1940, making it 70 years old, well beyond the 50 year age where most structures and properties fall into the historic category. The Clay Street Bridge was coded 5 when the original statewide survey was done in 1986-88, indicating it was not eligible for the National Register of Historical Properties. The bridge was identified as not being historical because at the time it was less than 50 years old, and the code has simply remained on the CalTrans Maintenance report since that time.

According to CalTrans' Structures Maintenance & Investigations, there are only 5 Local Agency Bridges in El Dorado County (out of 91) designated as having Historical Significance. The bridges on the Agency's list of those bridges located in the City of Placerville numbered only 9 structures, including the Canal Street, Bedford Avenue and Lower Main off-ramp bridges, all of which are gone. This short list also includes the Blairs Lane Bridge (slated for demolition,) and the bike path over Schnell School Road. This dwindling list is likely due to the State's aggressive bridge replacement program.

The Clay Street Bridge over Hangtown Creek, structure #25C0117, located 150 feet north of Main Street, is unique in that it is a reinforced concrete, double arch deck bridge with filled spandrels and an integrated culvert, built in 1940. Closed spandrel arch bridges are the most basic of reinforced concrete bridge types in that they mimic the appearance of masonry arch bridges. Closed spandrel means that the area between the deck and the arch ring was filled in. The barrel arch design is more likely to be found on older and smaller bridges with a short span length such as the Clay Street Bridge.

Closed (or filled) spandrel bridges date from the earliest use of reinforced concrete, generally from the 1890s through the 1920s. They are not as common as many of the standardized bridge types built during the same era. This arch bridge, built in 1940, was certainly not very common by that time, and was probably built in this style because it required less formwork to construct, and was extremely durable due to the retaining wall effect of the fill material and the large amount of concrete that went into the bridge. While State Departments of Transportation had developed standardized bridge types such as concrete slab and girders, the City was probably still building bridges in the style that had previously been common.

The present single lane bridge was built by the City of Placerville as a replacement for the previous bridge that was "removed at Clay and Union Streets and 18 feet 20 inch pipe laid," as reported in a July 16, 1936, Mountain Democrat article. The article recaps the "immense amount of work...to put the streets into really first class shape," including "28 feet 6 inch drain pipe laid at the Ivy House," and mentions "graded Union Street from Clay to Locust." (Union Street is the street where Highway 50 was built in the early 1950s; only small sections remain, including one west of Bedford Avenue and north of Highway 50.)

Because closed spandrel concrete arch bridges are not as common, they fall into the “Special Category” and they are significant in the context of the evolution of concrete technology and should, therefore, be preserved. In addition, the Bedford Avenue-Clay Street Residential Historic District’s period of significance is circa 1849-1940, and the 1940s Clay Street Bridge adjacent to the Historic District also depicts this time period.

The Clay Street Bridge is characterized as “functionally obsolete,” simply due to one factor, the narrowness of the structure, and is not considered “structurally deficient.” A functionally obsolete bridge is one that was built to standards that are not used today. These bridges are not automatically rated as structurally deficient, nor are they inherently unsafe. Functionally obsolete bridges are those that do not have adequate lane widths, shoulder widths, or vertical clearances to serve current traffic demand, or those that may be occasionally flooded.

The CalTrans Bridge Inspection Report from July, 2006, stated the following under “Condition of Structure” for the Clay Street Bridge:

The top of the left concrete rail has spalled along 25% of the length.

There is a 75 mm (3”) dip in the left sidewalk over Pier 2. It appears that the fill material between the arches has compressed because there are no indications of problems in the substructure. There are moderate size cracks at other locations on the sidewalk.

The arches remain in good condition.

The only work recommendations in the report were to place a bridge number on the face of the right barrier at Abutment 1, and to repair the sidewalk; none of this work was ever done. The date of the CalTrans report was prior to the Highway 50 Operational Improvement Project where the sewer lines were removed from Hangtown Creek at Clay Street.

To be considered significant, filled spandrel arches should have integrity through the retention of their character-defining features, which include the arch ring, barrel, spandrel wall, railing or parapet, end posts, piers and/or abutments and wing walls. The Clay Street Bridge has all of these features, in good condition as indicated in the 2006 inspection report, including reinforced concrete railings in a window design, angled wing walls and a smooth cap. As mentioned earlier, the wall cap has some spalling that needs to be repaired.

Page 3 of the Draft Project Report states “the bridge across Hangtown Creek is considered Functionally Obsolete, funding was made available through the HBP program *to evaluate the alternatives to bring the bridge up to standard.*” The report then goes on to state, on page 11, Rejected Structure Alternatives, Widening the existing bridge, “A widening alternative was considered, however was *immediately eliminated due to the new alignment requirements.*” One can only wonder how much HBP funds were required for thirty seconds consideration.

The Environmental Report did not offer any options to bridge replacement, except for the “No Project” alternative. It is interesting to note that a traffic analysis was performed for the Cedar Ravine/Main Street intersection utilizing a conventional signalized intersection “*to satisfy alternatives analysis requirements under CEQA,*” but no analysis was done to consider a three-way stop at Clay Street, or to make Clay Street one way, or to make the stop at Main Street a right turn only, instead of realignment and bridge replacement. Shouldn’t these options have been included “*to satisfy alternatives analysis requirements under CEQA*”?

The project has an obligation to avoid, minimize or mitigate any harm to historic resources, including the Clay Street Bridge. Rehabilitation of the bridge would make more sense in light of its location and the impact to the nearby historic districts and to the historic properties along Main Street. Perhaps the following alternatives might be considered:

Leave the bridge in place, complete the recommended repairs and put up signs to notify traffic of a one-way bridge ahead, or erect a stop sign or a yield sign in one direction.

The bridge could be left as a monument or pedestrian/bicycle bridge, and a bypass bridge could be designed.

The Clay Street Bridge could be maintained as one-half of a traffic pair, with one-way traffic on each bridge.

The bridge could be widened to two lanes, retaining the existing culvert, and repairing the side rails for pedestrian safety.

Why were none of these alternatives included in the Environmental Report “*to satisfy alternatives analysis requirements under CEQA*”?

The above comments clearly provide a fair argument for the preservation of the historic Clay Street Bridge. It is in the public interest to do so; therefore, the bridge *must not* be demolished.

Respectfully,



Sharlene McCaslin

## Response: McCaslin, Sharlene

### *McCaslin-1*

The project area is not in an historic district. The Bedford Avenue-Clay Street Residential Historic District is located north of U.S. 50. The Cedar Ravine Residential Historic District is located south of the Main Street/Cedar Ravine intersection.

### *McCaslin-2*

See the Response to Comment Mitchener-2.

### *McCaslin-3*

The Sierra Nevada Southern Route of the Lincoln Highway goes through Placerville, generally following the route of Main Street. The Lincoln Highway was constructed as a 12-foot wide concrete road. Portions of the concrete underlay Main Street. After its redesignation in 1925 as U. S. Highway 50, its route through Placerville continued to be along Main Street.

Nearly one hundred years of road reconstruction, asphalt overlays, and installation of underground utilities have affected the Lincoln Highway in Placerville. In the Main Street/Cedar Ravine intersection, underground utilities include a 10-inch sewer line, a 6-inch water line, at least two telephone lines, cable television, electrical lines, and the Cedar Ravine drainage culvert. Any remaining portions of the original concrete would lack integrity, and not be eligible for listing on the California Register of Historic Places. The "Archaeological Survey Report and Historic Study Report for the Placerville Operational Improvements Project" prepared by Caltrans in March 2000 states: "The routes of both the Old Placerville Road and the Lincoln Highway pass through Placerville as well, but none of the original roads remains today."

The Upper Main Street Rehabilitation project was funded with Federal Regional Surface Transportation Program (RSTP) and Transportation Development Act (TDA) funds. Neither of these funding sources are preservation grants. The project milled the existing asphalt and resurfaced the street. The work included replacement of some underground utilities in Main Street.

### *McCaslin-4*

See the Response to Comment Mitchener-4.

### *McCaslin-5*

In 2004, Caltrans completed a re-evaluation of 203 concrete arch bridges constructed before 1960. The Clay Street bridge was over 50 years old at the time. Caltrans determined that the bridge was not eligible for listing on the National Register of Historic Places because the bridge lacked significance under the federal criterion "C".

### *McCaslin-6*

See the Response to Comment Mitchener-2.

*McCaslin-7*

The Caltrans Bridge Inspection Report from July 2006 does not evaluate the historic significance of the bridge. See the Response to Comment McCaslin-5.

*McCaslin-8*

Clay Street will be realigned into a 4-legged intersection with Main Street and Cedar Ravine to improve the level of service for traffic. Widening the Clay Street bridge at its current location does not facilitate this project objective. Widening the bridge does not solve the existing hydraulic capacity problems.

*McCaslin-9*

CEQA requires that alternatives be analyzed in an Environmental Impact Report (EIR) when the proposed project has a *significant effect* on the environment. The CEQA Guidelines (15126.6) require a reasonable range of alternatives to be evaluated in an EIR. The CEQA Guidelines (15070) do not require the evaluation of alternatives for a Negative Declaration.

The letter suggested the consideration of four specific alternatives for preserving the bridge. The suggested alternatives are listed below, followed by a response.

*[A] Leave the bridge in place, complete the recommended repairs and put up signs to notify traffic of a one-way bridge ahead, or erect a stop sign or a yield sign in one direction.*

Retaining the existing bridge leaves a bridge that does not pass 50 or 100-year flows. The conversion of Clay Street into a one-way road is not consistent with the City's circulation plans. It would not be possible to realign Clay Street into a 4-legged intersection with Main Street and Cedar Ravine while retaining the existing bridge.

Two-lanes are required by current federal and state standards based on existing traffic volumes. As traffic volumes increase, maintaining a one lane bridge on a two way street results in increased congestion and a reduced the level of service.

*[B] The bridge could be left as a monument or pedestrian/bicycle bridge, and a bypass bridge could be designed.*

The Clay Street underpass at Highway 50 is the controlling point for road alignments. There is not enough space to provide a new two lane bridge and leave the existing bridge as a pedestrian bridge. Construction of the north abutment would conflict with the existing north bridge foundation. Any roadway alignment leaving the bridge in place and constructing a new, two-lane bridge upstream introduces a reverse "S"-curve with non-standard and undesirable alignment geometry.

*[C] The Clay Street Bridge could be maintained as one-half of a traffic pair, with one-way traffic on each bridge.*

Retaining the existing bridge and adding another bridge on the upstream side does not resolve the existing hydraulic capacity problems. Clay Street would remain on the existing alignment. It would preclude the realignment of Main Street/Clay Street/Cedar Ravine. It would not address the inadequate Level of Service projected for the intersection of Clay Street at Main Street. It would not solve the existing hydraulic capacity problems.

*[D] The bridge could be widened to two lanes, retaining the existing culvert, and repairing the side rails for pedestrian safety.*

It is costly and difficult construction to widen an earth filled arch bridge. Widening the existing bridge to current engineering standards would change the look of the bridge. The width of the existing bridge is 19 feet (17.5 feet clear). The new bridge will be 42 feet wide. It is unlikely that the original railings would be preserved. Clay Street would remain on the existing alignment. It would preclude the realignment of Main Street/Clay Street/Cedar Ravine. It would not address the inadequate Level of Service projected for the intersection of Clay Street at Main Street. It would not solve the existing hydraulic capacity problems.

**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

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October 14, 2010

Randy Pesses  
Director of Public Works  
City of Placerville  
City Hall, Third Floor  
3101 Center Street  
Placerville, CA 95667

- sent via email and United States Postal Services -

Clay Street at Main Street/Cedar Ravine Realignment and Clay Street Bridge (25C-0117) at Hangtown Creek Negative Declaration

Dear Mr. Pesses:

The State Office of Historic Preservation (OHP) has broad responsibility for the implementation of federal and state historic preservation programs in California. We thank you for the opportunity to comment on the above Clay Street at Main Street/Cedar Ravine Realignment and Clay Street Bridge (25C-0117) at Hangtown Creek Negative Declaration (ND). We understand that the public comment period for the above document is closed on October 12, 2010 but still intend to submit our letter with its concerns regarding the issues at hand. Our comments are concerned solely with CEQA requirements and are not intended to address any other federal or state preservation regulations.

The project consists of the demolition of the existing Clay Street Bridge that could be a significant historic resource. However, there is no indication within the ND that the possible significance of the bridge has been addressed. Therefore, per the CEQA definition, the above project which proposes to demolish the bridge could be a project with a significant adverse impact to an historical resource. (Public Res. Code 21080(d); CEQA Guidelines § 15064.5(b))

The California Appellate courts have held that a demolition is an adverse impact that cannot be mitigated below a level of significance. *League for Protection of Oakland's Architectural and Historical Resources v. City of Oakland* (1<sup>st</sup> Dist. 1997) 52 Cal. App. 4<sup>th</sup> 896 [60 Cal. Rptr. 2d 821]. Further, when an Initial Study identifies an impact that cannot be mitigated below a level of significance, the Lead Agency is required to prepare an Environmental Impact Report (EIR) (Public Res. Code 21080(d); CEQA Guidelines § 15064). Hence, it is possible that a Negative Declaration (ND) may not be used for this project and an EIR is required. The EIR must consider feasible mitigation measures that truly reduce or avoid adverse impacts and consider project alternatives.

We strongly advise the City to properly evaluate the potential significance of the bridge and adopt feasible mitigation measures which avoid or reduce all adverse impacts to the potential historical resource.

Moreover, we want to call to your attention that the National Register criteria are not the appropriate regulatory framework to be applied when determining whether an historical resource is an historical resource for purposes of CEQA. The benchmark to be used for CEQA is the California Register of Historical Resources. A resource might not qualify for the National Register but still be eligible for the California Register. Thus an evaluation using the inappropriate criteria could lead to wrong results compromising CEQA findings by a Lead Agency.

Again, we thank you for the opportunity to comment on the above project. Please understand that our comments herein are specifically related to the environmental review process and adequacy of documents prepared for the environmental review purposes. We do not take positions in support of or against projects, but rather focus on the environmental review process itself.

If you have any further questions, please don't hesitate to contact Ronald Parsons, Historian I, CEQA Coordinator Local Government Unit at (916) 653-5099 or at [rparsons@parks.ca.gov](mailto:rparsons@parks.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Milford Wayne Donaldson". The signature is fluid and cursive, with a large initial "M" and "W".

Milford Wayne Donaldson, FAIA  
State Historic Preservation Officer

## Response: State Parks

### *State Parks-1*

Comment noted. The letter was received by the City of Placerville after the end of the CEQA comment period.

### *State Parks-2*

See the Response to Comment Mitchener-2.

### *State Parks-3*

See the Response to Comment Mitchener-2.

### *State Parks-3*

The City of Placerville used the California Register criteria in its evaluation.



STATE OF CALIFORNIA  
 Governor's Office of Planning and Research  
 State Clearinghouse and Planning Unit



Arnold Schwarzenegger  
 Governor

Cathleen Cox  
 Acting Director

October 13, 2010

RECEIVED

00118

Randy Pesses  
 City of Placerville Public Works Engineering  
 City Hall  
 3101 Center Street, Third Floor  
 Placerville, CA 95667

RECEIVED  
 City of Placerville

Subject: Clay Street at Main Street / Cedar Ravine Realignment and Clay Street Bridge (25C-0117) at Hangtown Creek Replacement Project  
 SCH#: 2010092031

Dear Randy Pesses:

The State Clearinghouse submitted the above named Negative Declaration to selected state agencies for review. The review period closed on October 12, 2010, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
 Director, State Clearinghouse

**Response: State Clearinghouse**

*State Clearinghouse-1*  
Comment noted.

October 13, 2010

Mr. Randy Pesses  
Director of Public Works  
City of Placerville  
3101 Center Street  
Placerville, CA 95667

Re: INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Dear Mr. Pesses:

This comment letter is written on behalf of Friends of Old Hangtown ("Friends") concerning the MND for the Clay Street Realignment, Clay Street Bridge Replacement and Main Street/Cedar Ravine Roundabout Project ("Project.") "Friends" is composed of a diverse group of concerned community members in and around the area of the proposed project. For many of us the project would directly and, as planned, adversely affect our homes, businesses and sense of place.

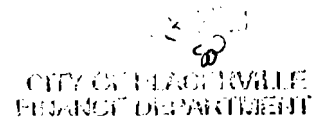
Our specific comments are set out below. We are focusing only on those aspects of the Project MND which are most dramatically flawed and out of compliance with the California Environmental Quality Act (CEQA) and the regulations promulgated by the State to establish the requirements for CEQA compliance.

The Project Description is Misleading and Inaccurate:

At the heart of CEQA is the statutory requirement that a "project description" be both complete and completely accurate, and that the project description not be changed over the course of or in different parts of the environmental analysis represented by the MND. Guideline 15124 requires, among other requirements, that a project description needs to set forth project objectives, which in the present case are wholly lacking insofar as there is no description of the physical development, and its environmental results that will occur as a result of using the described project to improve traffic conditions in Placerville.

The CEQA court decisions are unanimous in requiring a complete and accurate description of a "project" in an MND. See e.g. County of Inyo v. City of Los Angeles (1977), 71 Cal. App. 3d 185; Dusek v. Anaheim Redevelopment Agency (1986), 173 Cal App. 3d 1029; and Santiago Water District v. County of Orange (1981), 13 Cal App. 4<sup>th</sup> 31.

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ENGINEERING DIVISION  
City of Placerville

The present Project is misdescribed in the MND in several different ways throughout the document. The Project is labeled as one proposed to “redesign the Main Street/Clay Street and Main Street/Cedar Ravine Road intersections, replace the existing Clay Street Bridge at Hangtown Creek, and construct an extension to the multi-use El Dorado Trail. The project area, including the bridge replacement, intersection reconstruction, El Dorado Trail extension and replacement parking areas is 7.332 acres.”

There is no indication of the real purpose of the project, no problem description of what the issues are to be resolved, why the project was proposed in the first place, and what benefits are expected from the completion of the project. Describing the projected Level of Service in the year 2025 is misleading in the extreme, because any traffic improvements in the immediate project area would only lead to congestion and delays in all areas adjacent to and just outside the project area. The stated purpose of the design to “control vehicle speeds and to maximize safety” have no basis in reality, since vehicle speeds and safety have not been demonstrated to be problems in the past, currently or projected to be problems in the future.

The MND declares, “The project is intended to provide improved traffic conveyance in *downtown Placerville* and *enhanced recreational opportunities...*” (Mandatory Findings of Significance, page 20.) However, the Clay Street Draft Project Report contradicts the purpose by stating “The purpose of this project is to *improve roadway safety, reduce congestion meet current and future traffic needs.*” The MND justifies the need for the project to alleviate current traffic congestion and to provide for projected deterioration in levels of service. We submit the project, instead, suggests future traffic intensification. This anticipated reduction in level of service has the cumulative effect of traffic intensification throughout the city.

Item VI-a, of the MND then contradicts itself again by stating “The project will not result in an increase in vehicle trips or traffic congestion, or a decrease in level of service.” This is the very argument cited as the need for the project in the first place. So, which is it?

The Determination, on page xi of the MND states “the proposed project could have a significant effect on the environment,” yet it does not provide a compelling argument there will be any improvements at the completion of the project to justify these significant effects. The imagined benefits do not justify the following impacts:

- 1 Reduce or eliminate a handicapped accessible landscaped area overlooking Hangtown Creek.
- 2 Eliminate 34 parking spaces in the Ivy House Parking Lot as well as an undisclosed number of spaces on Pacific Street.
- 3 Demolish a historic bridge and visually impact an historic area and historic streetscapes.

## Roundabout Issues

The Clay Street Draft Project Report states “there are currently no published ‘design standards’ for roundabouts, and goes on to cite an FHWA publication, Roundabouts, an Informational Guide, under the chapter entitled Safety, states:

“Roundabouts may improve the safety of intersections by eliminating or altering conflict types, by reducing speed differentials at intersections, and by forcing drivers to decrease speeds as they proceed into and through the intersection.”

Under I, Land Use and Planning, b, the MND discussion section states: “The City of Placerville adopted the Main Street Streetscape Design Development Plan which calls for a 4-legged roundabout as the preferred intersection for Main Street/Clay Street/Cedar Ravine.” Selecting a roundabout as a design element for the streetscape plan by a committee doesn’t seem to be sufficient justification to construct a roundabout at this location, considering the degree of negative impacts.

The roundabout is designed to accommodate “the largest emergency response vehicle” and “large emergency vehicles would mount the truck apron adjacent to the central island to complete some turning movements,” according to the MND. It also states “emergency response times are not expected to be *significantly reduced* when compared to No Project conditions” and “*may improve.*” How will traffic “move to the right and pull over” when emergency vehicles approach? In the confusing surrounding of a roundabout how will drivers know how to move out of the way without causing an accident? This is of major concern due to the roundabout being on the thoroughfare to the hospital. Also it is unclear in the report as to the ability for emergency fire engines or other large vehicles to navigate this radius.

## Hazardous and Toxic Materials

The discussion on the REC’s identifies the Ivy House retaining wall failure repair of November, 1994. The MND should describe that failure in detail and describe the necessary steps that will be taken to make sure the events that led to this failure will not happen again. The past failure only impacted a parking lot. If this were to occur again it would stop the traffic flow causing a significant impact on the traffic circulation of Placerville. This issue has not been properly addressed to comply with CEQA requirements.

Tabor found evidence of hazardous substances and /or petroleum products within the project area during the ISA investigation that qualifies as recognized environmental conditions. The MND identifies the former gasoline service station is considered a REC and anticipated to be a source likely to affect the project area. Soils within the project area may contain naturally occurring asbestos. Hydrocarbon odors were also identified during geologic investigations, but no mitigation measures were offered. These conditions have the potential to cause significant negative impacts that must be adequately addressed to comply with CEQA. The City is taking on the liability of the completion of the project without knowing

the full and potential ramifications and associated costs. To continue with this project before identifying the actual extent of the hazardous and toxic material present is reckless and irresponsible.

#### Cumulative Effects and Growth Inducement

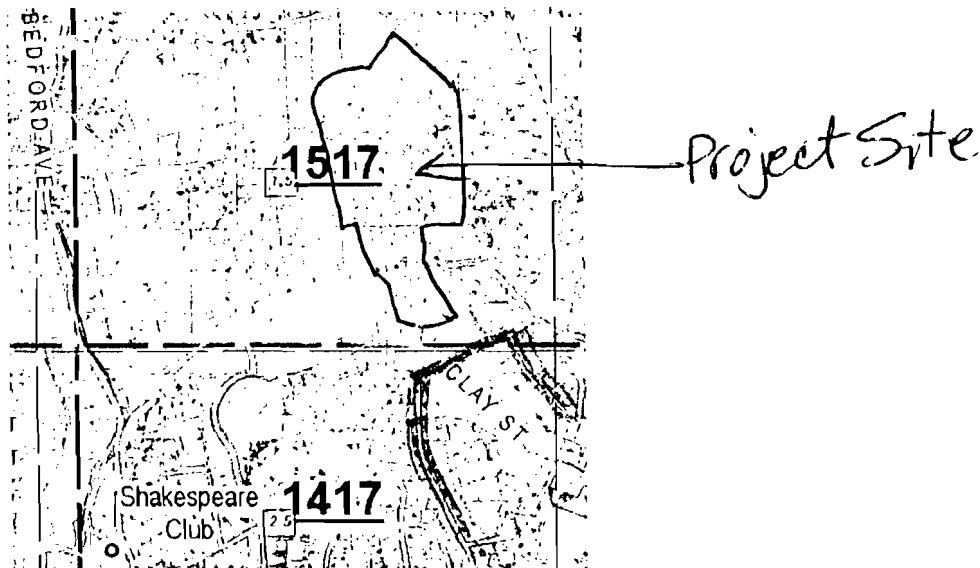
CEQA requires that the “growth inducing” impacts of any project be thoroughly analyzed in the MND. Public Resource Code section 21100(b)(5) and Guideline 15126, *Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001), 91 Cal App 4<sup>th</sup> 342. This analysis is totally missing from the present MND.

The final sentence of the MND states “The project will result in no cumulatively considerable impacts.” (Mandatory Findings of Significance, page 20.) CEQA compliance requires cumulative impacts to consider the effects of past projects, the effects of other current projects and the effects of probable future projects. Cumulative effects must be addressed due to this project creating and allowing for additional traffic capacity and more growth in the near future.

In fact, the realignment of Clay Street and the replacement of the Clay Street Bridge are for the express purpose of assisting residential developments north of and accessed by way of Clay Street, and will certainly contribute to increased growth. Item II b of the MND states “the project...will not extend public infrastructure into an undeveloped area.” While that statement may be technically correct, this project will by default support the extension of new roads into currently undeveloped areas, and will indirectly induce growth in the nearby neighborhoods.

The MND states on page 6, Issues (and Supporting Information Sources,) “The project will not generate additional traffic on Clay Street...” and “the project will not result in an increase in vehicle trips or traffic congestion.” The project *will* induce additional growth in the areas north of Clay Street, because post-project Clay Street will be able to support additional traffic.

The Cottonwood Park Planned Development Phases 4 & 6 are already in progress involving 39 single-family residential parcels and the completion of the project will most certainly generate additional traffic. The Cottonwood project involves the “continuation of Constellation Drive between Clay Street and Poverty Hill Road/Roddan Court” and “The project also is designed to facilitate a future connection to an undeveloped parcel located to the east.” (Community Development Department Planning Commission Staff Report, Cottonwood Park Planned Development Phases 4 & 6, September 7, 2010.) In addition, the Cottonwood Development Plan includes a propane farm which will cause propane delivery trucks to utilize Clay Street for access. The MND needs to measure and calculate the cumulative impacts that these future residential developments will create, and it has not done so.



Cottonwood Phases 4 & 6, north of Clay Street

#### Tree Replacement as Mitigation

The replacement ratio for removed mature trees does not, in fact, mitigate the adverse effects caused by the massive tree removal contemplated by the project. As anyone cognizant of the slow growth of trees can attest, the planting of 1-gallon size trees, and then requiring only 27 of the 40 to survive to be deemed “success” is ludicrous, and will change for years the visual aesthetics of the area. The project report also itemizes a number of non-native, invasive plants in the project area, but doesn’t even suggest abatement of these plants. The City of Placerville Plant List details a list of plants that should be removed when properties are developed including the Tree of Heaven and Vinca, among others. At the very least, invasive plant abatement should be included in any mitigation plan.

#### Historical Resources

The Draft Clay Street Realignment and Bridge (25C0117) Replacement ASR, page 1, states “An historic feature, the Druid Monument, was recorded.” It goes on to state, “No additional resources were found directly within the APE. Adjacent to the APE, are several historical resources, including two standing structures, two adits, and two rock retaining walls.” Page 23 of the above referenced document, under Study Findings and Conclusions, indicates “The Lincoln Highway/Central Overland Stage/Pony Express route(s) followed the portion of Main Street *present within the current project area...*” and “the roadway *probably* is categorically excluded from consideration as a historic property...” and concludes with “*it was decided not to record the portion of Main Street present within the project APE as a historic period*”

*archaeological site.*" This project will receive federal funding and is, therefore, subject to review under 106. This review has not yet been provided to the public for review.

#### El Dorado Trail Extension and Walkable Communities

Item VI-f of the MND describes the City of Placerville Non-Motorized Transportation Plan and related the project plans for the mixed use El Dorado Trail and the proposed Class 1 bike path. Completing the El Dorado Trail between Clay Street and Bedford is a great idea, but what does it have to do with the Clay Street Bridge Replacement, Clay Street Realignment and the construction of a modern roundabout? There are a number of logistical issues with the proposed El Dorado Trail Extension that were totally ignored in the MND. The report goes on to tout the Placerville Pedestrian Circulation Plan, but then finishes with the observation that none of the identified pedestrian improvements will be part of the project.

Studies have shown that narrower streets slow down traffic, encourages alternative forms of transportation and lead to a more walkable community. What could be more attractive and appealing than a stroll along a picturesque one-lane bridge over a beautiful, natural creek, or resting in a shady park to view the scenery? The roundabout project encourages people to use their cars rather than other forms of transportation. We, therefore, assert these improvements are counter to the stated purpose of the project and to the intent of CEQA.

#### Community Interaction

The initial public meeting in November 2007 was well attended by community members, the majority of whom were strongly opposed to the roundabout project. After the public meeting the only response from the project team was to fine tune the roundabout details, something the project engineers should have already done, and further analyze the need for replacement parking. This response from the City disregarded the very real objections and concerns of the community.

A second public meeting held a full two years after the first provided no new information and instead informed the public that this was not the time to voice their objections. The public again strongly opposed the project and in fact suggested the project be stopped before any addition money was invested. Meeting attendees were told the time to voice their concern was "after the environmental report is completed." Again the wishes of the community were downplayed, minimized or outright ignored.

Documents related to the project and the environmental impact were completed and piling up at the City office and yet none of the public were informed as to their existence until the MND was issued. When asked to view the public records citizens were faced with a number of project file folders in disarray. Documents were not available on-line nor were copies available at the public library. Community members who wished to review the reports were allowed to sit at the counter and read

When asked to view the public records citizens were faced with a number of project file folders in disarray. Documents were not available on-line nor were copies available at the public library. Community members who wished to review the reports were allowed to sit at the counter and read them during the four days a week the City office was open or were charged to make copies. Clearly these obstruction techniques were an attempt to hinder the public in becoming informed about this project.

We strongly suggest City staff work more closely with community members and not simply schedule public meetings because it is a requirement of a project. We also recommend they take the public's concerns seriously and work together to solve the issues.

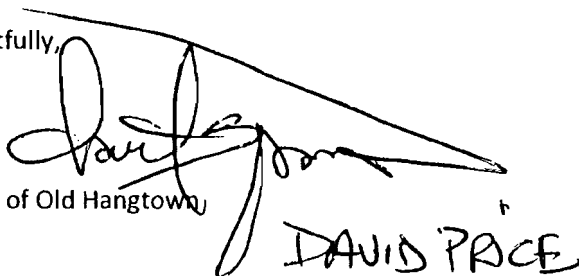
### Summary

The MND consistently underplayed the negative impacts of the proposed project and offered mitigation measures that were in no way sufficient to make up for the intrusion, loss of character and destruction of our historic, biological culture. Planting trees, installing part of the trail and creating a new parking lot do little to make up for what will be lost. The purported benefits of this project do not live up to its promise. The proposed project would have negative impacts on: scenic vistas, biological resources and historic resources and streetscapes.

We recommend the City build an additional public parking lot at the Locust Street south of Highway 50 location, complete the extension of the El Dorado Trail between Clay Street and Bedford, and perform the neglected maintenance on the streets, sidewalks, landscaping, parking lot and bridge. The people of Placerville would derive more benefit from this solution to a problem that doesn't exist than that proposed by the Clay Street Realignment and Bridge Replacement and Roundabout at Main Street/Cedar Ravine/Clay Street Project.

We request that the City withdraw the present MND from further processing at this time until the issues raised above have been satisfactorily resolved.

Respectfully,



DAVID PRICE

Friends of Old Hangtown

## Response: Price, David

### *Price-1*

The Initial Study provides a complete project description. The project has several components, namely the realignment of Clay Street into a four-legged intersection with Main Street and Cedar Ravine as a roundabout. The project includes the replacement of the existing Clay Street Bridge at Hangtown Creek, construction of a section of the El Dorado Trail, and construction of parking mitigation.

### *Price-2*

See Mitchner-3. Item 8 of the Initial Study Checklist, page iv, identifies the traffic problems that will be addressed by the implementation of the project. The project descriptions in the ISMND and the Draft Project Report are consistent and identify the all of the different project components. The project does not result in an increase of vehicle trips. The roundabout minimizes traffic congestion.

### *Price-3*

The Initial Study Checklist, page v, states: “This new El Dorado Trail segment would provide handicapped accessible viewing opportunities of the creek corridor to help offset the loss of the handicapped accessible overlook at the north edge of the Ivy House parking lot. Extension of the El Dorado Trail in this area would contribute to the long-term goal of establishing a continuous trail corridor stretching from the western end of the County to the eastern end.”

### *Price-4*

See Mitchner-5.

### *Price-5*

See Mitchner-4.

### *Price-6*

The Draft Project Report explains that the FHWA’s “Roundabouts: An Informational Guide” provides national guidance on the geometric features of roundabouts. The Main Street Streetscape Design Development Plan (Hyden 2005) identified a roundabout as a solution to improving circulation patterns at this location. The traffic analysis confirmed that a four-legged roundabout performed better than a signalized intersection.

### *Price-7*

The project has been designed to accommodate the largest emergency response vehicle likely to pass through the study area. The traffic study determined that “emergency response times are not expected to be significantly reduced when compared to No Project conditions. Emergency response circulation may improve through the study area commensurate with the expected reduction in overall intersection delay.” The Draft Project Report states: “A “California Legal” design vehicle was selected for through movements on Main Street which is a truck tractor-

semitrailer with a maximum length of 65 feet and width of 8.5 feet. A bus/fire truck is the design vehicle for Clay Street movements.”

California Vehicle Code section 21806 requires, upon the immediate approach of an emergency vehicle sounding a siren and flashing a red light, that the driver of a vehicle yield the right-of-way and immediately drive to the right-hand edge or curb, clear of any intersection, stop, and remain stopped until the emergency vehicle has passed. Whether the intersection is stop-sign controlled, signalized, or a roundabout, vehicles do not stop in the middle of the intersection to yield to emergency vehicles but pull over as soon as possible.

#### *Price-8*

The bridge and associated retaining walls that will be constructed as part of the project would be designed to withstand design year flows (statistical 100-year storm). The proposed intersection is located far enough away from Hangtown Creek that any unexpected failure of the existing creek bed and bank structures would not affect traffic circulation at the intersection or on Main Street. The Ivy House Parking Lot which will be reconfigured on both sides of the realigned Clay Street, will still be located between Hangtown Creek and the Main Street/Cedar Ravine intersection.

The technical studies found evidence of hazardous substances and/or petroleum products within the project area and characterized them as recognized environmental conditions (RECs). The City of Placerville owns the Ivy House Parking Lot and the existing road rights-of-way. The City is not acquiring property with an unknown liability. The Initial Study Checklist includes a series of avoidance and minimization measures to address the RECs. These measures reduce the potential exposing people to potential health hazards to less than significant. A “Phase II” investigation will be performed during final engineering design of the project to identify the cost of the activities required to address the RECs.

#### *Price-9*

The Initial Study Checklist documents that the project will not result in cumulatively considerable impacts. The project addresses identified circulation problems and is not “for the express purpose of assisting residential developments north of and accessed by way of Clay Street.”

The traffic study for the Clay Street project was prepared using forecasts developed using the El Dorado travel demand forecasting (TDF) model. The traffic study forecasts cumulative traffic conditions. The TDF model was created for the City of Placerville Traffic Impact Fee Study. The Traffic Impact Mitigation Fee Program adopted by the City Council in 1998, estimated the anticipated future development to occur within the City until 2015. It determined the various roadway improvements necessary to accommodate the traffic increases associated with that development, and estimated the costs to construct those various improvements.

#### *Price-10*

The Cottonwood Park Planned Development Phases 4 & 6 are the final phases of a development that began in 1988. The City of Placerville adopted a mitigated negative declaration for Phases 4 & 6 in 2006. Phases 4 and 6 have a circulation system that provides two access points by extending Constellation Drive and connecting Clay Street with Roddan Court and Poverty Hill

Road. The development facilitates a future connection to an undeveloped parcel located to the east off Utah Drive. The City determined that Phases 4 and 6 did not have significant effects or cumulatively significant impacts to traffic or on the environment.

#### *Price-11*

The project will result in the removal of up to 21 native and 6 non-native trees. If potential parking along the El Dorado Trail extension is not constructed, six Valley oaks and a large Coast redwood could be retained. A five-year success criteria for a minimum of 1:1 replacement is part of the project. The monitoring activities include the control of invasive weeds.

Most of the project area is currently paved and will be resurfaced as part of the project construction. A native plant seed mix is included in the Natural Environment Study for revegetating disturbed ground. The Natural Environment Study states: "Weed control, as specified in Section 20-4.08, shall be performed as required. Weeds removed shall be disposed of in conformance with provisions in Section 7-1.13 of the Caltrans Standard Specifications."

#### *Price-12*

See Mitchner-2, Mitchner-4, and McCaslin-3.

#### *Price-13*

The City determined it was appropriate to include the El Dorado Trail Clay to Bedford extension in the design contract because it is physically proximate to the Clay Street Bridge. The bridge design, the realignment of Clay Street, and the evaluation of replacement parking influences the design of the Trail crossing at Clay Street.

The CEQA Checklist question for Transportation/Circulation asks if the project conflicts with adopted policies supporting alternative transportation. It is not the intent of the CEQA Checklist question to require the implementation of all potential plans. The Clay Street/Main Street roundabout project does not conflict with the Placerville Pedestrian Circulation Plan (Ped Plan) which proposes the construction of new sidewalks along Cedar Ravine and Thompson Way.

#### *Price-14*

The City of Placerville's Main Street Streetscape Design Development Plan (Hyden 2005) identified the roundabout as an appropriate intersection for a walkable community. It identifies pedestrian safety improvements for traversing the roundabout, as compared with unsignalized intersections. It considers the roundabout to be second "only in importance to the tower plaza area from a public image and spatial organization standpoint" in meeting the plan's three objectives, which are:

1. Preserve and enhance the historical character and assets of Downtown.
2. Improve the pedestrian shopping experience.
3. Develop a plan that is aesthetically cohesive and economically viable, a plan that can be implemented through a multi-phase and multi-year effort.

#### *Price-15*

The history of the public involvement and planning for the roundabout began prior to 2007. The Main Street Streetscape Design Development Plan completed in 2005 states that it "is a synthesis

of previous plans and ideas for the Main Street streetscape developed over the last twelve years. As such, it does not break new ground or take a new direction in the vision of what the Main Street streetscape should be.” The City, with its reduced work week and its existing information technologies infrastructure, strives to increase public availability of documents. This project followed regular procedures for making documents available at the counter and on the web.

*Price-16*

Summary comments noted.