

FINAL  
MITIGATED NEGATIVE DECLARATION  
AND INITIAL STUDY

FOR THE

EL DORADO TRAIL PROJECTS:  
RAY LAWYER DRIVE TO MAIN STREET AND CLAY  
STREET TO BEDFORD AVENUE

MARCH 2013

*Prepared for:*

City of Placerville  
3101 Center Street  
Placerville, CA 95667

*Prepared by:*

De Novo Planning Group  
4630 Brand Way  
Sacramento, CA 95819  
(916) 580-9818

D e N o v o P l a n n i n g G r o u p

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A Land Use Planning, Design, and Environmental Firm





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**Mitigated Negative Declaration for the  
El Dorado Trail Projects: Ray Lawyer Drive to Main Street and Clay Street to Bedford Avenue**

**Lead Agency:** City of Placerville  
3101 Center Street  
Placerville, CA 95667

**Project Title:** El Dorado Trail Projects:  
Ray Lawyer Drive to Main Street and Clay Street to Bedford Avenue

**Project Location:** The proposed project consists of two segments of the El Dorado Trail located approximately one mile apart in the City of Placerville, El Dorado County. Segment 1 (Main Street and Ray Lawyer Drive) is located between Main Street/Forni Road and Ray Lawyer Drive along a former railroad right-of-way. Segment 2 (Clay Street and Bedford Avenue) is located between Clay Street and Bedford Avenue adjacent to Hangtown Creek. (See Figures 1 through 4 in the Initial Study)

**Project Description:** The proposed project is an extension of two segments of the El Dorado Trail. The El Dorado Trail is a concept for a trail that spans the entire length of El Dorado County from the western county line to the Lake Tahoe Basin. The El Dorado Trail currently extends from the western El Dorado County line to the Camino area just east of Placerville. Some segments are already completed with Class I Bike Paths, other segments are currently in development, open for use as a natural trail, or are proposed for improvement. An alignment east of Camino to South Lake Tahoe is yet to be determined.

Segment 1 (Main Street and Ray Lawyer Drive): This segment of the El Dorado Trail includes the construction of an approximately 4,000-foot long Class I bike path along a former railroad right-of-way. The trail is proposed to be as wide as 14-feet, which consists of a 10-foot paved trail with 2-foot shoulders. Staging areas are designated along the eastern and western limits of the project. The proposed trail corridor between Main Street and Ray Lawyer Drive is largely level but has a slight grade from the eastern terminus at Main Street up to Ray Lawyer Drive. The grade steepens near the Ray Lawyer Drive terminus, which will require a pedestrian switchback ramp to meet slope standards.

Segment 2 (Clay Street and Bedford Avenue): This segment of the El Dorado Trail includes the construction of an approximately 800-foot long Class I bike path that will be constructed to connect the existing paved trail terminus at Clay Street to the new Bike/Pedestrian overcrossing of US 50 at Bedford Avenue. The trail is proposed to be as wide as 16-feet, which consists of a 12-foot paved trail with 2-foot shoulders. Currently, the multi-use El Dorado Trail ends on the east side of Clay Street, north of Hangtown Creek. The proposed trail corridor between Clay Street and Bedford Avenue was cleared and leveled for use as a staging area for the U.S. Highway 50 Operational Improvements Project. After the construction staging was completed wood chips were placed on the ground as a temporary trail surface. A new sewer system was also constructed along the proposed trail corridor. An extension of the paved El Dorado Trail would be constructed in this leveled area. The right of way is to be relinquished to the City.

**Findings:**

In accordance with the California Environmental Quality Act, the City of Placerville has prepared an Initial Study to determine whether the proposed project may have a significant adverse effect on the environment. The Initial Study (including a Response to Comments) and Mitigated Negative Declaration reflect the independent judgment of City of Placerville staff. On the basis of the Initial Study, the City of Placerville hereby finds:

*Although the proposed project could have a significant adverse effect on the environment, there will not be a significant adverse effect in this case because the project has incorporated specific provisions to reduce impacts to a less than significant level and/or the mitigation measures described herein have been added to the project. A Mitigated Negative Declaration has thus been prepared.*

The Initial Study, which provides the basis and reasons for this determination, is attached and/or referenced herein and is hereby made a part of this document.

---

Nate Stong, P.E., City Engineer

Date

**Mitigation Measures:**

The following Mitigation Measures are extracted from the Initial Study. These measures are designed to avoid or minimize potentially significant impacts, and thereby reduce them to an insignificant level. A Mitigation Monitoring and Reporting Program (MMRP) is an integral part of project implementation to ensure that program level mitigation is properly implemented by the City of Placerville. The MMRP will describe actions required to implement the appropriate mitigation for each CEQA category including identifying the responsible agency, program timing, and program monitoring requirements. Based on the analysis and conclusions of the Initial Study, the impacts of the proposed project would be mitigated to less-than-significant levels with the implementation of the mitigation measures presented below.

**Mitigation Measure 1:** *The City of Placerville shall implement the following equipment exhaust emissions mitigation measures as outlined in the El Dorado County Air Pollution Control District (APCD) – CEQA Guide:*

- *Require the prime contractor to minimize the amount of ground being worked on at one time to less than 12 acres.*
- *Require the prime contractor to provide an approved plan demonstrating that heavy-duty (i.e., greater than 50 horsepower) off-road vehicles to be used in the construction project, and operated by either the prime contractor or any subcontractor, will achieve, at a minimum, a fleet-averaged 15 percent NOx reduction compared to the most recent CARB fleet average. Successful implementation of this measure requires the prime contractor to submit a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during the construction project. Usually the inventory includes the horsepower rating, engine production year, and hours of use or fuel throughput for each piece of equipment. In addition, the inventory list is updated and submitted monthly throughout the duration of when the construction activity occurs.*
- *Obligate the prime contractor to use aqueous emulsified fuel or an alternative fuel verified by the California Air Resources Board or otherwise documented through emissions testing to have the greatest NOx and PM<sub>10</sub> reduction benefit available, provided each pollutant is reduced by at least 15 %.*

**Mitigation Measure 2:** *The City of Placerville shall implement the following fugitive dust control mitigation measures as outlined in the El Dorado County APCD – CEQA Guide:*

- *Earth-moving (except construction cutting and filling areas)*
  - *1a. Maintain soil moisture content at a minimum of 12 percent, as determined by American Society for Testing and Materials (ASTM) method D-2216, or other equivalent method approved by the District; two soil moisture evaluations must be conducted during the first three hours of active operations during a calendar day, and two such evaluations each subsequent four-hour period of active operations; OR 1a-1. For any earth-moving which is more than 100 feet from all property lines, conduct watering as necessary to prevent visible dust emissions from exceeding 100 feet in length in any direction.*
- *Earth-moving – construction fill areas*
  - *1b. Maintain soil moisture content at a minimum of 12 percent, as determined by ASTM method D-2216, or other equivalent method approved by the District; for areas which have an optimum moisture content for compaction of less than 12 percent, as determined by*

*ASTM method 1557 or other equivalent method approved by the District, complete the compaction process as expeditiously as possible after achieving at least 70 percent of the optimum soil moisture content; two soil moisture evaluations must be conducted during the first three hours of active operations during a calendar day, and two such evaluations during each subsequent four-hour period of active operations.*

- *Earth-moving – construction cut areas and mining operations*
  - *1c. Conduct watering as necessary to prevent visible emissions from extending more than 100 feet beyond the active cut or mining areas unless the area is inaccessible to watering vehicles due to slope conditions or other safety factors.*
- *Disturbed surface areas (except completed grading areas)*
  - *2a/b. Apply dust suppression in a sufficient quantity and frequency to maintain a stabilized surface; any areas which cannot be stabilized, as evidenced by wind driven dust, must have an application of water at least twice per day to at least 80 percent of the unstabilized area.*
- *Disturbed surface areas – completed grading areas*
  - *2c. Apply chemical stabilizers within 5 working days of grading completion; OR 2d. Take action 3a or 3c specified for inactive disturbed surface areas.*
- *Inactive disturbed surface areas*
  - *3a. Apply water to at least 80 percent of all inactive disturbed surface areas on a daily basis when there is evidence of wind driven fugitive dust, excluding any areas which are inaccessible due to excessive slope or other safety conditions; OR 3b. Apply dust suppressants in sufficient quantity and frequency to maintain a stabilized surface; OR 3c. Establish a vegetative ground cover within 21 days after active operations have ceased; ground cover must be of sufficient density to expose less than 30 percent of unstabilized ground within 90 days of planting, and at all times thereafter; OR 3d. Utilize any combination of control actions 3a, 3b and 3c such that, in total, they apply to all inactive disturbed surface areas.*
- *Unpaved roads*
  - *4a. Water all roads used for any vehicular traffic at least once per every two hours of active operations; OR 4b. Water all roads used for any vehicular traffic once daily and restrict vehicle speed to 15 mph; OR 4c. Apply chemical stabilizer to all unpaved road surfaces in sufficient quantity and frequency to maintain a stabilized surface.*
- *Open storage piles*
  - *5a. Apply chemical stabilizers; OR 5b. Apply water to at least 80 percent of the surface areas of all open storage piles on a daily basis when there is evidence of wind driven fugitive dust; OR 5c. Install a three-sided enclosure with walls with no more than 50 percent porosity that extend, at a minimum, to the top of the pile.*
- *Track-out control*
  - *6a. Pave or apply chemical stabilization at sufficient concentration and frequency to maintain a stabilized surface starting from the point of intersection with the public paved surface, and extending for a centerline distance of at least 100 feet and width of at least 20*

*feet; OR 6b. Pave from the point of intersection with the public paved road surface, and extending for a centerline distance of at least 25 feet and a width of at least 20 feet, and install a track-out control device immediately adjacent to the paved surface such that exiting vehicles do not travel on any unpaved road surface after passing through the track-out control device.*

**Mitigation Measure 3:** *The City of Placerville shall implement the following measures to avoid and minimize environmental effects to special-status aquatic amphibians and reptiles:*

- *A preconstruction survey for special-status aquatic amphibians and reptiles will be conducted within 48 hours prior to the start of construction activities adjacent to the riparian and aquatic habitat in the project area. A qualified biologist will be present during grubbing and clearing activities adjacent to the riparian and aquatic habitat in the project area. If special-status aquatic amphibians and/or reptiles are observed in the construction area, construction will cease until a qualified biologist determines that aquatic amphibians and reptiles are not in the construction zone, or the special-status species can be safely moved to an alternative location by a qualified biologist.*
- *Environmental awareness training will be conducted prior to onset of project work for construction personnel to brief them on how to recognize aquatic amphibians including California Red-Legged Frog (CRLF), Foothill Yellow-Legged Frog (FYLF), and Northwestern Pond Turtle (NWPT).*
- *If CRLF is encountered in the work area, construction shall stop and the U.S. Fish and Wildlife Service contacted for guidance.*
- *The City of Placerville will implement best management practices to protect water quality and control erosion. A spill prevention and clean-up plan will be prepared.*

**Mitigation Measure 4:** *The City of Placerville shall install orange construction barrier fencing to identify environmentally sensitive areas around the sensitive habitat areas (creeks/drainages/riparian and montane hardwood-conifer forest). Before construction, the contractor shall work with the project engineer and qualified biologist to identify the locations for the barrier fencing, and place stakes around the sensitive resource sites to indicate these locations. The fencing shall be installed before construction activities are initiated and shall be maintained throughout the construction period. The following paragraph shall be included in the construction specifications:*

- *The Contractor’s attention is directed to the areas designated as “environmentally sensitive areas.” These areas are protected, and no entry by the Contractor for any purpose will be allowed unless specifically authorized in writing by the City of Placerville. The Contractor will take measures to ensure that Contractor’s forces do not enter or disturb these areas, including giving written notice to employees and subcontractors.*

*Temporary fences around the environmentally sensitive areas will be installed as the first order of work. Temporary fences will be furnished, constructed, maintained, and removed as shown on the plans, as specified in the special provisions, and as directed by the project engineer. The fencing will be commercial-quality woven polypropylene, orange in color, and at least 4 feet high (Tensor Polygrid or equivalent). The fencing will be tightly strung on posts with a maximum 10-foot spacing.*

**Mitigation Measure 5:** *If construction is scheduled to begin between February 1 and August 31 a qualified biologist shall conduct a preconstruction survey for active nests in the project area and within a 250-ft radius of the project area from publicly accessible areas within 30 days prior to construction. If no active nest of a bird of prey or Migratory Bird Treaty Act (MBTA) bird is found, then no further action is necessary.*

*If an active nest of a bird of prey or MBTA bird is found, then the biologist shall determine the size of an Environmentally Sensitive Area (ESA) around the nest. The ESA size shall be subject to City approval. The size of suitable nest buffers depends on the species of bird, the location of the nest relative to the project, project activities during the time the nest is active, and other situation specific conditions.*

*No construction activity shall be allowed in the ESA until the biologist determines that the nest is no longer active.*

**Mitigation Measure 6:** *Prior to final design and improvement plan approval, the Public Works Department shall coordinate with the Police Department to ensure that the design and improvement plans, including any shrub removal, tree thinning, limbing, and removal, accommodates adequate sightlines for trail user safety. In addition, the Public Works Department shall coordinate with the Fire Department to ensure that the design and improvement plans, including any shrub removal, tree thinning, limbing, and removal, accommodates adequate fire hazard control. If the plans will require tree removal, such removal shall be evaluated and documented in a report prepared by a certified arborist or registered professional forester. Any tree removal shall include replacement of the same tree species at a 3:1 ratio.*

**Mitigation Measure 7:** *To minimize the risk of introducing additional non-native species into the area, weed-free erosion control applications shall be used. No dry-farmed straw will be used and certified weed-free straw shall be required where erosion control straw is to be used. In addition, hydro-seed mulch or any other erosion control application must also be certified weed-free. If a revegetation seed mix is to be used, the mix shall also be certified weed-free and contain native species appropriate for the project area.*

*All off-road equipment to be cleaned of potential noxious weed sources (mud, vegetation) before entry onto the construction area, to help ensure noxious weeds are not introduced into the project area. The contractor shall employ whatever cleaning methods (typically with the use of a high-pressure water hose) as necessary to ensure that equipment is free of noxious weeds. Equipment shall be considered free of soil, seeds, and other such debris when a visual inspection does not disclose such material. Disassembly of equipment components or specialized inspection tools is not required.*

**Mitigation Measure 8:** *If cultural resources (i.e., prehistoric sites, historic sites, and isolated artifacts and features) are discovered work shall be halted immediately within 50 meters (165 feet) of the discovery, the City of Placerville shall be notified, and a qualified archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology shall be retained to determine the significance of the discovery.*

*The City of Placerville shall consider mitigation recommendations presented by the professional archaeologist for any unanticipated discoveries and shall carry out the measures deemed feasible and appropriate. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures.*

**Mitigation Measure 9:** *If human remains are discovered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to their origin and disposition pursuant to Public Resource code Section 5097.98. If the Coroner determines that no investigation of the cause of death is required, and if the remains are of Native American origin, the Coroner will notify the Native American Heritage Commission, which in turn will inform a most likely descendent. The descendent will then recommend to the landowner appropriate disposition of the remains and any grave goods.*

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## INITIAL STUDY CHECKLIST

### PROJECT TITLE

El Dorado Trail Projects:  
Ray Lawyer Drive to Main Street and Clay Street to Bedford Avenue

### LEAD AGENCY NAME AND ADDRESS

City of Placerville  
3101 Center Street  
Placerville, CA 95667

### CONTACT PERSON AND PHONE NUMBER

Nathan Stong, P.E., City Engineer  
City of Placerville Development Services Dept.  
3101 Center Street  
Placerville, CA 95667  
(530) 642-5526

### PROJECT SPONSOR'S NAME AND ADDRESS

City of Placerville  
3101 Center Street  
Placerville, CA 95667

### PROJECT LOCATION AND SETTING

The proposed project is located in the City of Placerville, El Dorado County (Figure 1). The proposed project consists of two segments of the El Dorado Trail located approximately one mile apart (Figure 2 and 3). Figure 4 provides an aerial view of the two segments. The location of each segment is described below:

**Segment 1 (Main Street and Ray Lawyer Drive):** This segment of the El Dorado Trail is located in the City of Placerville between Main Street/Forni Road and Ray Lawyer Drive along a former railroad right-of-way (Figure 4a). U.S. Highway 50 occurs to the north, the intersection of Forni Road/Main Street occur to the east, Forni Road occurs to the south, Ray Lawyer Drive occurs to the west. There are a few small businesses located on Forni Road at the intersection with Main Street. Residential housing occurs to the south along Forni Road at a very low density. The main physical features in the project area include: paved surfaces along Main Street, Forni Road, Placerville Drive, and Ray Lawyer Drive; a dirt/gravel surfaced former railroad right-of-way (El Dorado Trail); and the headwaters of a natural drainage that ultimately flows into Hangtown Creek located to the north of the proposed El Dorado Trail. The natural drainage is culverted under Forni Road from the east at the Forni Road/Main Street intersection. Elevation in the project area ranges from approximately 1,850 to 1,900 ft above sea level.

**Segment 2 (Clay Street and Bedford Avenue):** This segment of the El Dorado Trail is located in the City of Placerville between Clay Street and Bedford Avenue adjacent to Hangtown Creek (Figure

4b). U.S. Highway 50 occurs to the north, small businesses occur along Main Street to the east and west, and small businesses and residential housing occur to the south. Paved surfaces including Clay Street, Main Street, Cedar Ravine Road, Pacific Street, Locust Avenue, the Ivy House parking lot, and the El Dorado Trail are the main physical features in the project area. Hangtown Creek flows in a westerly direction through the project area (Figure 5). The Cedar Ravine drainage flows north-northwest and joins Hangtown Creek at the Clay Street Bridge. The Cedar Ravine drainage is in an underground culvert in the project area. Elevation in the project area ranges from approximately 1,850 to 1,925 ft above sea level.

## PROJECT DESCRIPTION

The proposed project is an extension of two segments of the El Dorado Trail. The El Dorado Trail is a concept for a trail that spans the entire length of El Dorado County from the western county line to the Lake Tahoe Basin. The El Dorado Trail currently extends from the western El Dorado County line to the Camino area just east of Placerville. Some segments are already completed with Class I Bike Paths, other segments are currently in development, open for use as a natural trail, or are proposed for improvement. An alignment east of Camino to South Lake Tahoe is yet to be determined.

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**Segment 2 (Clay Street and Bedford Avenue):** This segment of the El Dorado Trail includes the construction of an approximately 800-foot long Class I bike path that will be constructed to connect the existing paved trail terminus at Clay Street to the new Bike/Pedestrian overcrossing of US 50 at Bedford Avenue. The trail is proposed to be as wide as 16-feet, which consists of a 12-foot paved trail with 2-foot shoulders. Currently, the multi-use El Dorado Trail ends on the east side of Clay Street, north of Hangtown Creek. The proposed trail corridor between Clay Street and Bedford Avenue was cleared and leveled for use as a staging area for the U.S. Highway 50 Operational Improvements Project. After the construction staging was completed wood chips were placed on the ground as a temporary trail surface. A new sewer system was also constructed along the proposed trail corridor. An extension of the paved El Dorado Trail would be constructed in this leveled area. The right of way is to be relinquished to the City.

### **OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED (E.G., PERMITS, ETC.)**

The City of Placerville will be the Lead Agency for construction of proposed project pursuant to the State Guidelines for Implementation of the California Environmental Quality Act (CEQA), Section 15050.

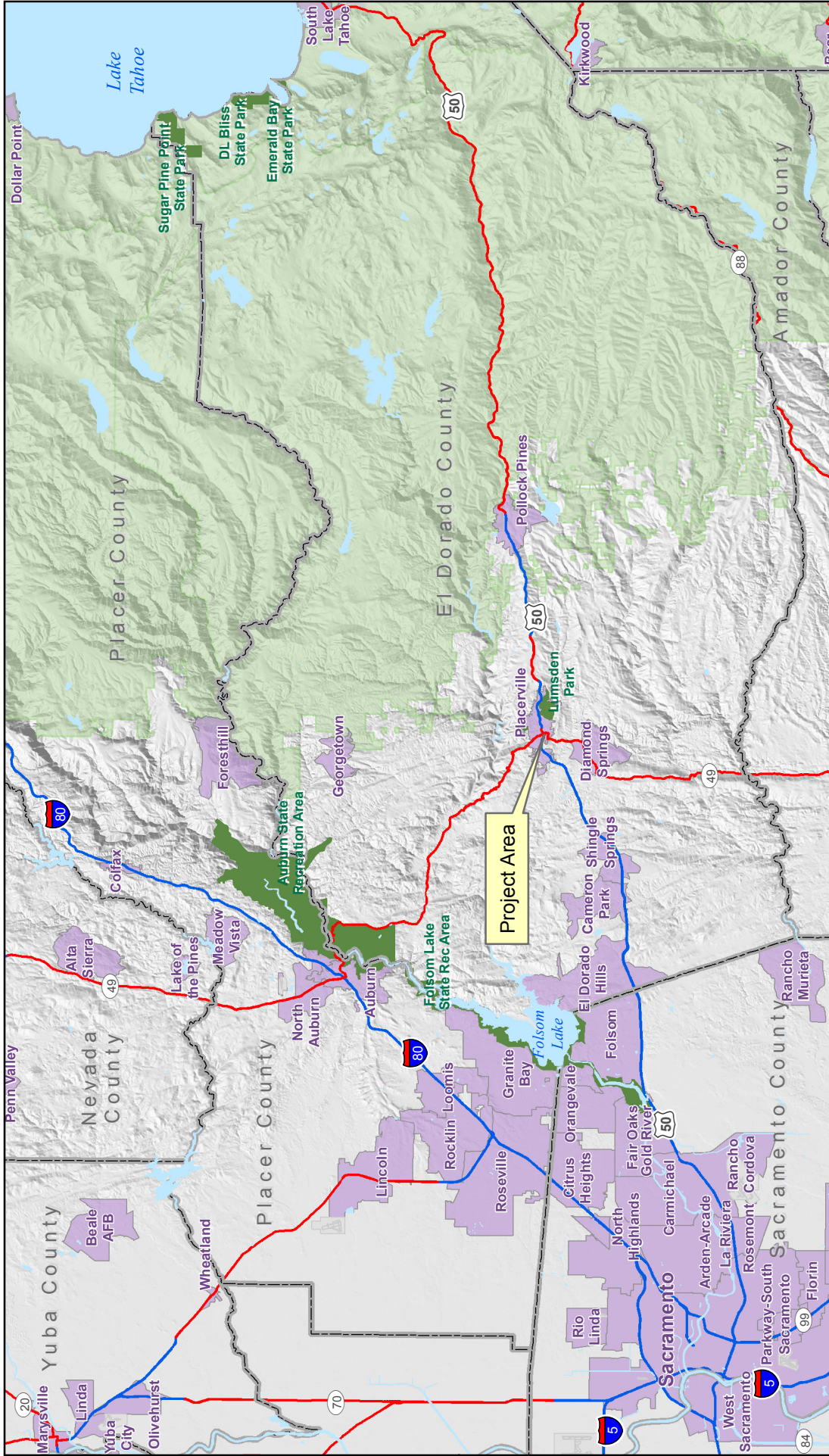
The following additional agency approvals/permits will apply proposed project:

- California Department of Transportation (Caltrans): Encroachment permit
- Central Valley Water Quality Control Board (RWQCB): NPDES permit

### **RESPONSES TO COMMENT**

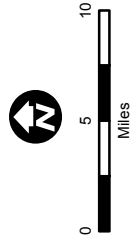
Written comments provided to the City of Placerville on the Initial Study are reproduced at the end of this Initial Study, along with responses to those comments. Where changes to the Initial Study text are warranted based on the comments, those changes are identified herein with revision marks (underline for new text, ~~strike out~~ for deleted text).

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EL DORADO TRAIL IMPROVEMENTS PROJECT

Figure 1. Regional Map



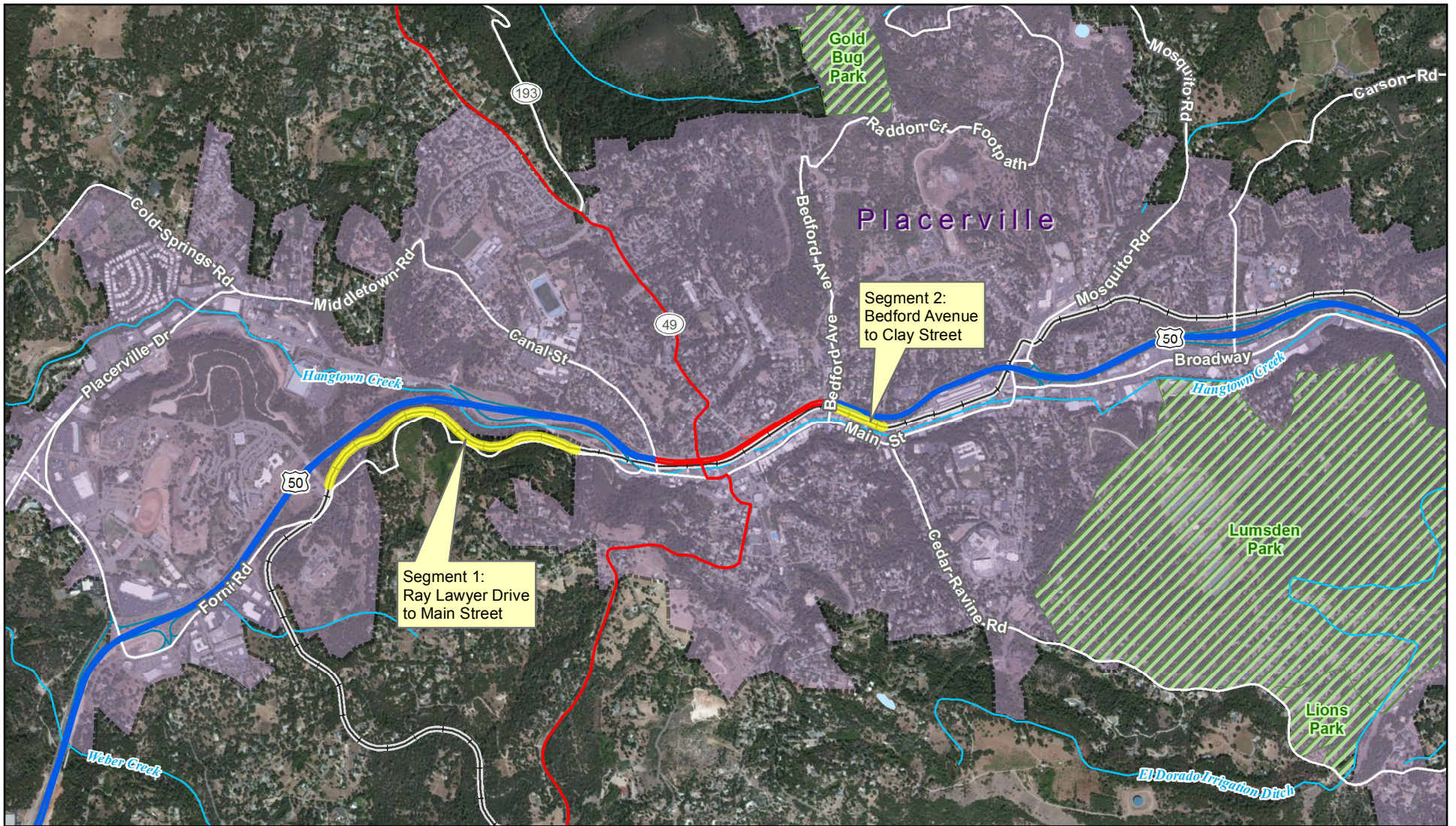
- City Areas
- State Park
- National Forest Area

Data sources: ESRI/StreetMap North America, California Spatial Information Library.  
 Map date: January 17, 2013.

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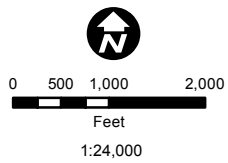
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EL DORADO TRAIL IMPROVEMENTS PROJECT

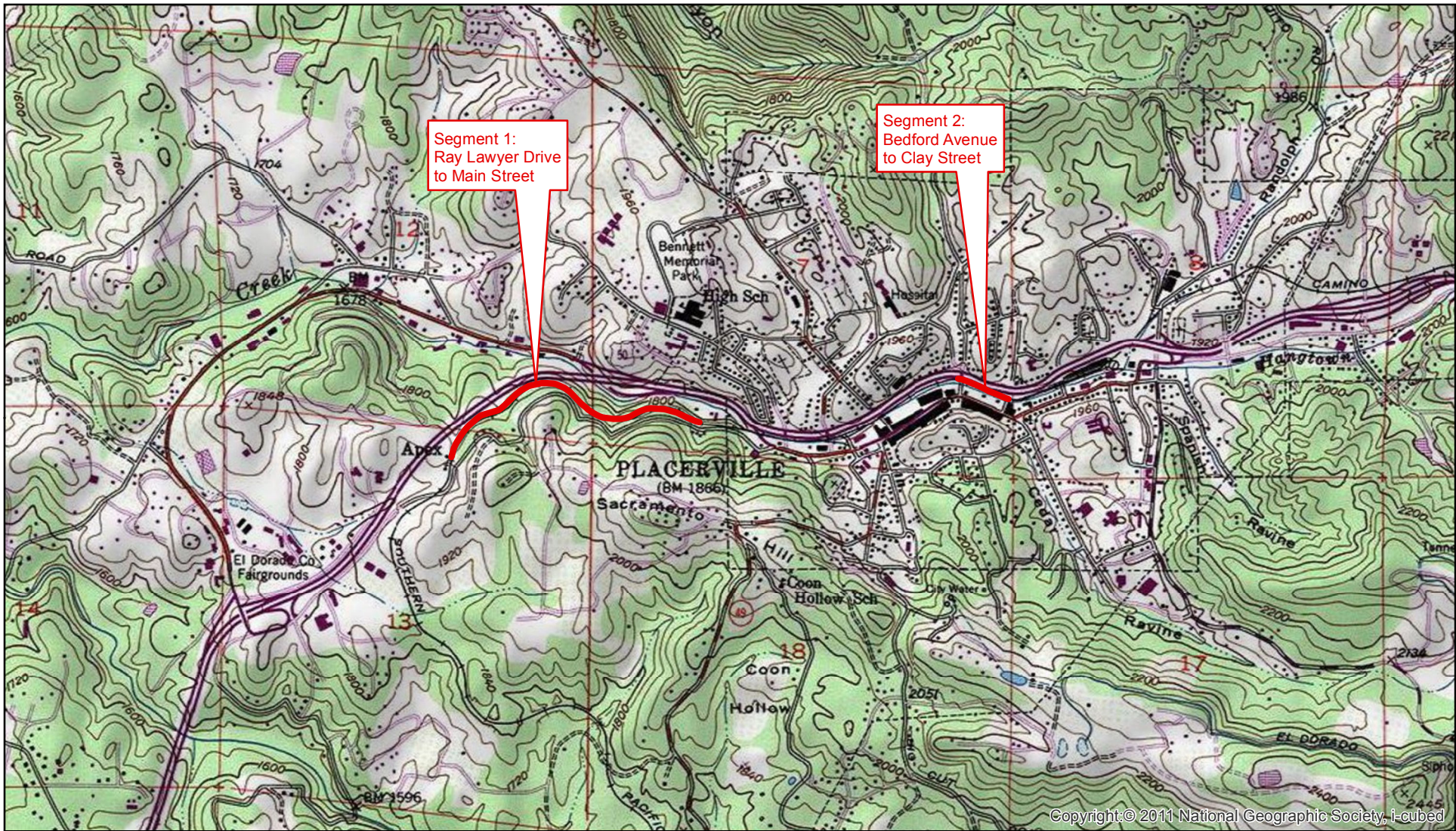
Figure 2. Vicinity Map



Data sources: ESRI StreetMap North America, ESRI Online BING Aerial Images.  
Map date: January 16, 2013.

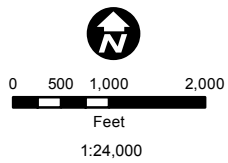
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EL DORADO TRAIL IMPROVEMENTS PROJECT

**Figure 3. USGS Map  
Placerville Quadrangle**



Data sources: ArcGIS Online USGS Topographic Map Service.  
Map date: January 11, 2013.

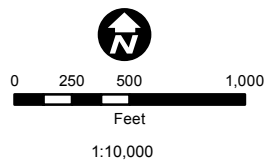
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Segment 1:  
Ray Lawyer Drive  
to Main Street

Segment 2:  
Bedford Avenue  
to Clay Street

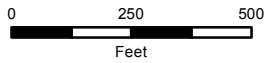
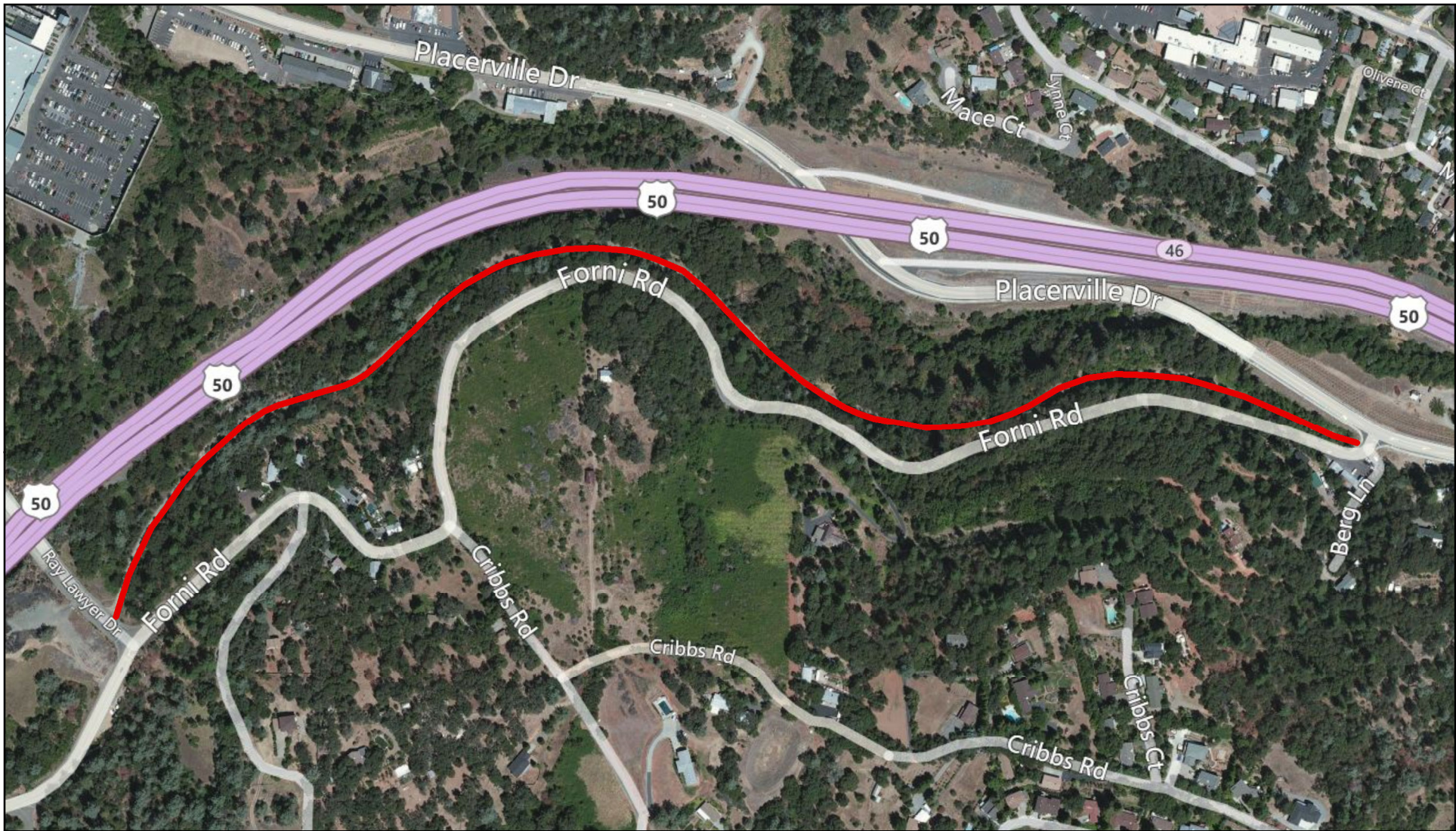


**EL DORADO TRAIL IMPROVEMENTS PROJECT**

**Figure 4. Aerial Photo**

Data sources: ArcGIS Online BING Map Service.  
Map date: January 11, 2013.

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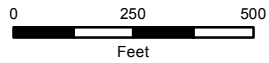
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EL DORADO TRAIL IMPROVEMENTS PROJECT

**Figure 4a. Aerial Photo**  
**Segment 1 - Ray Lawyer Drive**  
**to Main Street**

Data sources: ArcGIS Online BING Map Service.  
Map date: January 11, 2013.

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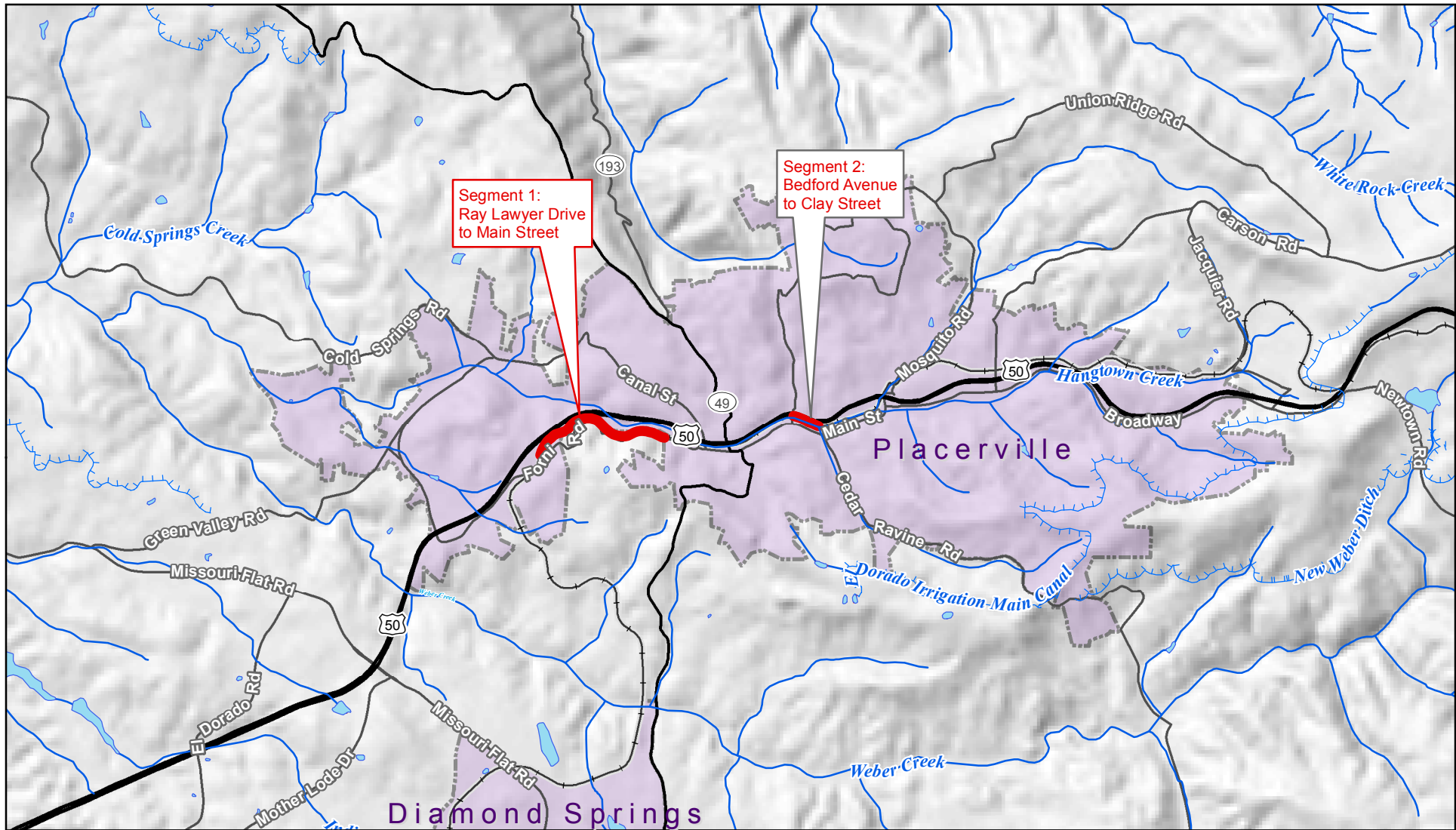
EL DORADO TRAIL IMPROVEMENTS PROJECT

Figure 4b. Aerial Photo  
Segment 2 - Bedford Avenue  
to Clay Street

Data sources: ArcGIS Online BING Map Service.  
Map date: January 11, 2013.

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Segment 1:  
Ray Lawyer Drive  
to Main Street

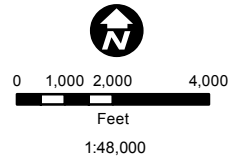
Segment 2:  
Bedford Avenue  
to Clay Street

Placerville

Diamond Springs

EL DORADO TRAIL IMPROVEMENTS PROJECT

Figure 5. Hydrology Map



Data sources: USGS National Hydrography Data Set, ESRI StreetMap North America, California Spatial Information Library. Map date: January 17, 2013.

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## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

	Aesthetics		Agriculture Resources		Air Quality
	Biological Resources		Cultural Resources		Geology /Soils
	Hazards & Hazardous Materials		Hydrology / Water Quality		Land Use / Planning
	Mineral Resources		Noise		Population / Housing
	Public Services		Recreation		Transportation/Traffic
	Utilities / Service Systems		Mandatory Findings of Significance		

## DETERMINATION:

On the basis of this initial evaluation:

	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
X	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

## EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significant.

## ENVIRONMENTAL CHECKLIST

This section of the Initial Study incorporates the most current Appendix "G" Environmental Checklist Form, contained in the CEQA Guidelines. Impact questions and responses are included in both tabular and narrative formats for each of the 17 environmental topic areas.

### I. AESTHETICS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

### RESPONSES TO CHECKLIST QUESTIONS

**Response a-c):** Views of scenic resources, including water resources, natural habitat/plant communities, and scenic highways are available from/to both proposed trail segments. The proposed project would not change the view to the middle ground or background elements of the broad viewshed, or remove the visually important trees, rocks, or historic buildings in the foreground. The proposed project would maintain open space in the project area, and the only permanent changes that would be visible would be surficial improvements (i.e. paved path). Implementation of the proposed project will have a **less than significant** impact relative to this issue.

**Response d):** The proposed project would not create substantial new sources of light and glare near sensitive receptors. There are no nighttime features proposed as part of the project, and there are no new structures proposed that would include reflective surfaces that could increase daytime glare in the project area. The project may lead to increased use of the area by pedestrians and bicycles, but these uses would not substantially increase daytime glare. Implementation of the proposed project will have a **less than significant impact** relative to this issue.

**II. AGRICULTURE AND FOREST RESOURCES**

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			X	
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?			X	
d) Result in the loss of forest land or conversion of forest land to non-forest use?			X	
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			X	

**RESPONSES TO CHECKLIST QUESTIONS**

**Response a):** The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Implementation of the proposed project would have a **less than significant** impact relative to this issue.

**Response b):** The proposed project would not conflict with the zoning for agricultural use or a Williamson Act Contract. Implementation of the proposed project would have a **less than significant** impact relative to this issue.

**Response c-d):** The proposed project does not include improvements on forest lands or areas under timber production. Implementation of the proposed project would have a **less than significant** impact relative to this issue.

**Response e):** The proposed project does not involve changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use, or conversion of forest land to non-forest use. The proposed project will have a **less than significant** impact on agricultural or forest lands or operations.

*III. AIR QUALITY*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		X		
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?		X		
d) Expose sensitive receptors to substantial pollutant concentrations?		X		
e) Create objectionable odors affecting a substantial number of people?			X	

*RESPONSES TO CHECKLIST QUESTIONS*

**Responses a):** Air quality management plans are based on land use and growth assumptions evaluated in the regional and community planning documents. The proposed project is programed within the latest El Dorado County Regional Transportation Plan, which has been determined to be in conformance with the State Implementation Plan. Because it was evaluated for, and included in, the latest conforming El Dorado County Regional Transportation Plan, the project would not conflict with or obstruct implementation of the applicable air quality plan. This is considered a **less than significant** impact.

**Responses b-d):** El Dorado County is currently in nonattainment status for the 8-hour ozone national ambient air quality standard (NAAQS). The County is also in nonattainment status for the ozone and PM<sub>10</sub> California ambient air quality standards (CAAQS). The El Dorado County Air Quality Management District (AQMD) administers the state and federal Clean Air Acts in accordance with state and federal guidelines. The AQMD regulates air quality through its district rules and permit authority. It also participates in planning review of discretionary project applications and provides recommendations. The following District rules apply to the proposed project:

- Rule 223 Fugitive Dust – General Requirements
- Rule 223-1 Fugitive Dust – Construction Requirements
- Rule 223-2 Fugitive Dust – Asbestos Hazard Mitigation
- Rule 224 – Cutback and Emulsified Asphalt

The proposed project is a non-motorized transportation project and would not result in long-term operational emissions. However, construction activities have the potential to result in short term

air quality impacts during the construction phase of the proposed project. Construction emissions could result from Equipment Exhaust and Worker Commute Trips, Fugitive Dust, and Asphalt Paving. The El Dorado County AQMD's *Guide to Air Quality Assessment, Determining Significance of Air Quality Impacts Under the California Environmental Quality Act* (February 2002) provides methodologies for assessing construction related air quality impact associated with each of these categories. The following assessment is consistent with the El Dorado County AQMD's recommendations:

**Screening of Equipment Exhaust Emissions:** The El Dorado County AQMD's *Guide to Air Quality Assessment, Determining Significance of Air Quality Impacts Under the California Environmental Quality Act* (February 2002) provides that "Based on its experience with construction activities, and taking into account the temporary and non-continuous nature of construction emissions, ROG and NOx emissions during construction may be assumed to be not significant if...the project encompasses 12 acres or less of ground that is being worked at one time and at least one of the mitigation measures relating to such pollutants described in Section 4.4.1 of this chapter (or an equivalent measure) is incorporated into the project..." The El Dorado County AQMD also states that "If ROG and NOx mass emissions are determined to be not significant under the provisions above, then it can be assumed that exhaust emissions of other air pollutants from the operation of equipment and worker commute vehicles are also not significant." The following mitigation measure incorporates the AQMD's recommended mitigation measures for control of equipment exhaust emissions and ensures that equipment exhaust emissions and worker commute trip emissions are **less than significant**.

**Mitigation Measure 1:** *The City of Placerville shall implement the following equipment exhaust emissions mitigation measures as outlined in the El Dorado County APCD – CEQA Guide:*

- *Require the prime contractor to minimize the amount of ground being worked on at one time to less than 12 acres.*
- *Require the prime contractor to provide an approved plan demonstrating that heavy-duty (i.e., greater than 50 horsepower) off-road vehicles to be used in the construction project, and operated by either the prime contractor or any subcontractor, will achieve, at a minimum, a fleet-averaged 15 percent NOx reduction compared to the most recent CARB fleet average. Successful implementation of this measure requires the prime contractor to submit a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during the construction project. Usually the inventory includes the horsepower rating, engine production year, and hours of use or fuel throughput for each piece of equipment. In addition, the inventory list is updated and submitted monthly throughout the duration of when the construction activity occurs.*
- *Obligate the prime contractor to use aqueous emulsified fuel or an alternative fuel verified by the California Air Resources Board or otherwise documented through emissions testing to have the greatest NOx and PM<sub>10</sub> reduction benefit available, provided each pollutant is reduced by at least 15 %.*

**Screening of Fugitive Dust Emissions:** The El Dorado County AQMD's *Guide to Air Quality Assessment, Determining Significance of Air Quality Impacts Under the California Environmental*

*Quality Act* (February 2002) provides that “Mass emissions of fugitive dust PM<sub>10</sub> need not be quantified, and may be assumed to be not significant, if the project includes mitigation measures that will prevent visible dust beyond the project property lines, in compliance with Rule 403 of the South Coast AQMD...” The following mitigation measure incorporates the AQMD’s recommended mitigation measures and ensures that fugitive dust emissions are **less than significant**.

**Mitigation Measure 2:** *The City of Placerville shall implement the following fugitive dust control mitigation measures as outlined in the El Dorado County APCD – CEQA Guide:*

- *Earth-moving (except construction cutting and filling areas)*
  - *1a. Maintain soil moisture content at a minimum of 12 percent, as determined by ASTM method D-2216, or other equivalent method approved by the District; two soil moisture evaluations must be conducted during the first three hours of active operations during a calendar day, and two such evaluations each subsequent four-hour period of active operations; OR 1a-1. For any earth-moving which is more than 100 feet from all property lines, conduct watering as necessary to prevent visible dust emissions from exceeding 100 feet in length in any direction.*
- *Earth-moving – construction fill areas*
  - *1b. Maintain soil moisture content at a minimum of 12 percent, as determined by ASTM method D-2216, or other equivalent method approved by the District; for areas which have an optimum moisture content for compaction of less than 12 percent, as determined by ASTM method 1557 or other equivalent method approved by the District, complete the compaction process as expeditiously as possible after achieving at least 70 percent of the optimum soil moisture content; two soil moisture evaluations must be conducted during the first three hours of active operations during a calendar day, and two such evaluations during each subsequent four-hour period of active operations.*
- *Earth-moving – construction cut areas and mining operations*
  - *1c. Conduct watering as necessary to prevent visible emissions from extending more than 100 feet beyond the active cut or mining areas unless the area is inaccessible to watering vehicles due to slope conditions or other safety factors.*
- *Disturbed surface areas (except completed grading areas)*
  - *2a/b. Apply dust suppression in a sufficient quantity and frequency to maintain a stabilized surface; any areas which cannot be stabilized, as evidenced by wind driven dust, must have an application of water at least twice per day to at least 80 percent of the unstabilized area.*
- *Disturbed surface areas – completed grading areas*
  - *2c. Apply chemical stabilizers within 5 working days of grading completion; OR 2d. Take action 3a or 3c specified for inactive disturbed surface areas.*
- *Inactive disturbed surface areas*
  - *3a. Apply water to at least 80 percent of all inactive disturbed surface areas on a daily basis when there is evidence of wind driven fugitive dust, excluding any areas which are inaccessible due to excessive slope or other safety conditions; OR 3b. Apply dust suppressants in sufficient quantity and frequency to maintain a stabilized surface; OR 3c. Establish a vegetative ground cover within 21 days after active operations have ceased; ground cover must be of sufficient*

*density to expose less than 30 percent of unstabilized ground within 90 days of planting, and at all times thereafter; OR 3d. Utilize any combination of control actions 3a, 3b and 3c such that, in total, they apply to all inactive disturbed surface areas.*

- *Unpaved roads*
  - *4a. Water all roads used for any vehicular traffic at least once per every two hours of active operations; OR 4b. Water all roads used for any vehicular traffic once daily and restrict vehicle speed to 15 mph; OR 4c. Apply chemical stabilizer to all unpaved road surfaces in sufficient quantity and frequency to maintain a stabilized surface.*
- *Open storage piles*
  - *5a. Apply chemical stabilizers; OR 5b. Apply water to at least 80 percent of the surface areas of all open storage piles on a daily basis when there is evidence of wind driven fugitive dust; OR 5c. Install a three-sided enclosure with walls with no more than 50 percent porosity that extend, at a minimum, to the top of the pile.*
- *Track-out control*
  - *6a. Pave or apply chemical stabilization at sufficient concentration and frequency to maintain a stabilized surface starting from the point of intersection with the public paved surface, and extending for a centerline distance of at least 100 feet and width of at least 20 feet; OR 6b. Pave from the point of intersection with the public paved road surface, and extending for a centerline distance of at least 25 feet and a width of at least 20 feet, and install a track-out control device immediately adjacent to the paved surface such that exiting vehicles do not travel on any unpaved road surface after passing through the track-out control device.*

**Asphalt Emissions:** ROG emissions are released from the evaporation of solvents contained in asphalt paving materials. The El Dorado County AQMD’s *Guide to Air Quality Assessment, Determining Significance of Air Quality Impacts Under the California Environmental Quality Act* (February 2002) provides a formula for calculating asphalt emissions (Emissions = Emissions Factor (lbs/acre/day) x Acres (Acres paved per day)). The emissions factor is established by the AQMD as 2.62 lbs/acre/day of ROG. The threshold of significance for ROG is established as 82 pounds per day.

Under a worst-case scenario (i.e. entire segment paved in one day), Segment 1 would emit 38.2 lbs of ROG and Segment 2 would generate 4.7 lbs of ROG. Assuming both segments are paved on the same day, the collective ROG emissions from asphalt paving would be 42.9 lbs which is below the 82 lbs per day threshold. Nevertheless, the paving operations will require compliance with District Rule 224 as it relates to asphalt materials. Implementation of the proposed project would have a **less than significant** impact related to asphalt paving.

**Response e):** The proposed project will not create any objectionable odors during operation. During the construction phase of the project there will be short term and temporary odors associated with typical construction activities (diesel exhaust, asphalt paving, etc). These odors are not anticipated to be noticeable beyond the boundaries of the construction areas, and would be short term and temporary. This is considered a **less than significant** impact.

*IV. BIOLOGICAL RESOURCES*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?		X		
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		X		
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		X		
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

*BACKGROUND*

Segment 1 (Main Street and Ray Lawyer Drive) was surveyed by Steve McMurtry on January 5, 2013. The reconnaissance-level survey included traversing the project limits on foot and performing a windshield survey for the area within an approximately two-mile radius of the project limits. The purpose of the survey was to verify the biological conditions within the project limits and vicinity. Aerial photographs of the project limits were also examined to assess any changes that have occurred from historical aerial photos.

Segment 2 (Clay Street and Bedford Avenue) has been surveyed multiple times dating back to 2007. Steve McMurtry performed a reconnaissance-level survey on January 5, 2013. Jeffery Little conducted reconnaissance site visits on July 11, 2007 and October 12, 2007. Chuck Hughes, M.S., and Jessica Easley conducted a general biological survey on December 8, 2008 and Mr. Hughes conducted a general biological survey on April 15, 2009. Mr. Hughes and Ms. Easley conducted a

general biological survey and fieldwork for the jurisdictional delineation and biological survey on August 25, 2009 and Mr. Hughes collected additional GPS data for the jurisdictional delineation on August 31, 2009.

In addition to the surveys performed on Segment 2 identified above, protocol CRLF surveys were conducted at Clay Street at Hangtown Creek under the USFWS 2005 guidelines in 2006 and 2007 for a project located in the City of Placerville. In 2006, daytime field surveys were conducted on 1 and 13 March and 27 September. The 2006 nighttime surveys were conducted on 13 and 29 March, 5 and 13 April, and 27 September. In 2007, daytime field surveys were conducted on 17 May and 5 July. The 2007 nighttime surveys were conducted on 17, 24, and 31 May, 7 June, and 5 July. Additional CRLF surveys were conducted under the USFWS 1997 and 2005 guidelines along Hangtown Creek and within a 2.5-mile radius of the BSA.

### *RESPONSES TO CHECKLIST QUESTIONS*

#### **Response a):**

#### **Invertebrate Species:**

There are no documented or observed special status invertebrates within the BSA. Implementation of the proposed project would have a **less than significant** impact relative to this issue.

#### **Fish Species:**

There are no documented or observed special status fish within the BSA. Implementation of the proposed project would have a **less than significant** impact relative to this issue.

#### **Plant Species:**

There are no documented or observed special status plants within the BSA. Implementation of the proposed project would have a **less than significant** impact relative to this issue.

#### **Mammal Species:**

There are no documented or observed special status mammals within the BSA. Implementation of the proposed project would have a **less than significant** impact relative to this issue.

#### **Amphibian and Reptile Species:**

***California Red-Legged Frog (CRLF; *Rana draytonii*)***: CRLF is listed as Threatened by the federal Endangered Species Act. Based on the biological studies which include documentation of protocol California red-legged frog surveys conducted in the project area and several miles up- and downstream of the project, a U.S. Fish and Wildlife Service biologist concurred during a field review with Caltrans, that the project is not likely to adversely affect CRLF.

***Foothill Yellow-Legged Frog (FYLF; *Rana boylei*)***: FYLF is a State species of special concern. This species occurs in woodland and forest areas near streams and rivers, especially near riffles where there are rocks (Stebbins 2003). FYLF require permanent streams in which to reside (Verner and

Boss 1980). FYLF were not observed in the project area during the reconnaissance surveys, general biological survey, the delineation fieldwork, or during the protocol California red-legged frog surveys conducted in the project area and within a 2.5 mi radius of the project.

**Northwestern Pond Turtle (NWPT; *Actinemys marmorata marmorata*):** NWPT is a State species special of concern. NWPT are associated with permanent or nearly permanent water in a wide variety of habitat types, which include ponds, lakes, streams, irrigation ditches or permanent pools along intermittent streams (Zeiner et al. 1988). NWPT was not observed in the project area during surveys at Hangtown Creek. Hangtown Creek provides potential habitat for NWPT. Cedar Ravine culvert in the BSA is unsuitable habitat, as is the small drainage at the eastern terminus of Segment 1.

Implementation of the following mitigation measure would ensure avoidance of special-status aquatic amphibians and reptiles and that potential impacts are reduced to a **less than significant** level.

**Mitigation Measure 3:** *The City of Placerville shall implement the following measures to avoid and minimize environmental effects to special-status aquatic amphibians and reptiles:*

- *A preconstruction survey for special-status aquatic amphibians and reptiles will be conducted within 48 hours prior to the start of construction activities adjacent to the riparian and aquatic habitat in the project area. A qualified biologist will be present during grubbing and clearing activities adjacent to the riparian and aquatic habitat in the project area. If special-status aquatic amphibians and/or reptiles are observed in the construction area, construction will cease until a qualified biologist determines that aquatic amphibians and reptiles are not in the construction zone, or the special-status species can be safely moved to an alternative location by a qualified biologist.*
- *Environmental awareness training will be conducted prior to onset of project work for construction personnel to brief them on how to recognize aquatic amphibians including California Red-Legged Frog (CRLF), Foothill Yellow-Legged Frog (FYLF), and Northwestern Pond Turtle (NWPT).*
- *If CRLF is encountered in the work area, construction shall stop and the U.S. Fish and Wildlife Service contacted for guidance.*
- *The City of Placerville will implement best management practices to protect water quality and control erosion. A spill prevention and clean-up plan will be prepared.*

**Mitigation Measure 4:** *The City of Placerville shall install orange construction barrier fencing to identify environmentally sensitive areas around the sensitive habitat areas (creeks/drainages/riparian and montane hardwood-conifer forest). Before construction, the contractor shall work with the project engineer and qualified biologist to identify the locations for the barrier fencing, and place stakes around the sensitive resource sites to indicate these locations. The fencing shall be installed before construction activities are initiated and shall be maintained throughout the construction period. The following paragraph shall be included in the construction specifications:*

- *The Contractor's attention is directed to the areas designated as "environmentally sensitive areas." These areas are protected, and no entry by the Contractor for any purpose will be allowed unless specifically authorized in writing by the City of Placerville. The Contractor will take measures to ensure*

*that Contractor's forces do not enter or disturb these areas, including giving written notice to employees and subcontractors.*

*Temporary fences around the environmentally sensitive areas will be installed as the first order of work. Temporary fences will be furnished, constructed, maintained, and removed as shown on the plans, as specified in the special provisions, and as directed by the project engineer. The fencing will be commercial-quality woven polypropylene, orange in color, and at least 4 feet high (Tensor Polygrid or equivalent). The fencing will be tightly strung on posts with a maximum 10-foot spacing.*

### **Migratory Birds and Birds of Prey**

Fish and Game Code 3503.5 protects all birds in the orders Falconiformes and Strigiformes (collectively known as birds of prey). Birds of prey include raptors, falcons, and owls. Migratory birds are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703-711). The MBTA makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed in 50 CFR Part 10 including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). All migratory bird species are protected by the MBTA. The MBTA applies to construction activities and construction-related disturbance. Foraging and nesting habitat occurs in the project area for birds of prey and migratory birds. Although no nests were observed during surveys, a nest could become established in or near the project area before construction begins.

If construction begins outside the February 1 to August 31 breeding season, there will be no need to conduct a preconstruction survey for active nests. If a nest becomes active after construction has started, then the bird is considered adapted to construction disturbance. An active nest is one with eggs or unfledged young.

Implementation of the following mitigation measure would ensure that the potential impacts to migratory birds and birds of prey are reduced to a **less than significant** level.

***Mitigation Measure 5:** If construction is scheduled to begin between February 1 and August 31 a qualified biologist shall conduct a preconstruction survey for active nests in the project area and within a 250-ft radius of the project area from publicly accessible areas within 30 days prior to construction. If no active nest of a bird of prey or MBTA bird is found, then no further action is necessary.*

*If an active nest of a bird of prey or MBTA bird is found, then the biologist shall determine the size of an Environmentally Sensitive Area (ESA) around the nest. The ESA size shall be subject to City approval. The size of suitable nest buffers depends on the species of bird, the location of the nest relative to the project, project activities during the time the nest is active, and other situation specific conditions.*

*No construction activity shall be allowed in the ESA until the biologist determines that the nest is no longer active.*

**Responses b):** There is riparian habitat in the drainage that is immediately adjacent to the eastern terminus of Segment 1. There is also riparian habitat along Hangtown Creek, which is adjacent to entire length of Segment 2. The design of both segments avoid direct disturbance to the riparian habitat or the associated drainage/creek.

There is montane hardwood-conifer forest habitat along the entire length of Segment 1, and in a few remnant patches along Segment 2. The original design of both segments avoid direct disturbance to the montane hardwood-conifer forest habitat. However, comments received during the 30-day public review period note that the many young trees and brush that have overgrown the edge of the rail bed along this Segment 1 poses a risk to public health and safety due to the fact that an attacker could easily hide at arms-length, without being seen in time to avoid or defend against the attacker. Comments indicated that this is a long and isolated section, with numerous homeless camps along the route, which also must be dealt with by the City. These comments warrant design modifications and enhancements by the City to ensure public health and safety is maintained to the greatest extent feasible along Segment 1. Such design modifications and enhancements include thinning, limbing and cutting of trees along Segment 1 in order to gain an improved line of sight and an increased sense of security for trail users. Additionally, design modifications and enhancements require the elimination of the switchback ADA ramp at the western end of Segment 1 and the replacement of a direct/straight route with an ADA compliant grade/slope that will require additional fill and removal of some trees to accommodate the fill. These design modifications and enhancements have the potential to cause an impact to trees; however, with the implementation of a mitigation measure the potential impact is reduced to a less than significant level.

Implementation of Mitigation Measure 4 (previously presented) and Mitigation Measure 6 would ensure that the potential impact to riparian forest and montane hardwood-conifer forest habitat is reduced to a **less than significant** level.

**Mitigation Measure 6:** Prior to final design and improvement plan approval, the Public Works Department shall coordinate with the Police Department to ensure that the design and improvement plans, including any shrub removal, tree thinning, limbing, and removal, accommodates adequate sightlines for trail user safety. In addition, the Public Works Department shall coordinate with the Fire Department to ensure that the design and improvement plans, including any shrub removal, tree thinning, limbing, and removal, accommodates adequate fire hazard control. If the plans will require tree removal, such removal shall be evaluated and documented in a report prepared by a certified arborist or registered professional forester. Any tree removal shall include replacement of the same tree species at a 3:1 ratio.

**Responses c):** The proposed project includes construction activities that are adjacent to creeks/drainages including Hangtown Creek and a tributary. The design of both segments avoid direct disturbance to these waterways. A previously identified mitigation measure would ensure that the limits of construction will be marked with temporary fencing to avoid impacts to these waterways during construction. Implementation of a previously presented mitigation measure would ensure that the potential impact to protected waters is reduced to a **less than significant** level.

**Response d):** There are not any documented wildlife corridors or wildlife nursery sites on or adjacent to the BSA for Segment 1 or Segment 2. Furthermore, the field survey did not reveal any corridor or nursery sites. Implementation of the proposed project will have **no impact** relative to this issue.

**Response e):** On February 3, 1999, President Clinton signed Executive Order (EO) 13112 that directs federal agencies to expand and coordinate their efforts to combat the introduction and spread of plants and animals not native to the United States. The EO prohibits federal agencies from authorizing, funding, or carrying out actions that are likely to cause or promote the introduction or spread of invasive species unless all reasonable measures to minimize risk of harm have been analyzed and considered.

The FHWA issued the *Federal Highway Administration Guidance on Invasive Species* (FWHA, 1999), which was developed to implement the EO. The guidance document provides a framework for preventing the introduction of and controlling the spread of invasive plant species on highway rights-of way. The guidance notes that federal aid and Federal Highway Program funds cannot be used for construction, revegetation, or landscaping activities that purposely include the use of known invasive species. The guidance document requires the consideration of invasive species in NEPA documents including:

- Identification of any invasive terrestrial or aquatic animal or plant species that could do harm to native habitats within the project study area
- Likelihood of introducing or spreading invasive species
- Description of measures implemented to minimize their potential harm

Construction activities and soil disturbance from improvements could result in the introduction and spread of noxious weeds and other invasive plants, as could inappropriate erosion control measures. Erosion control measures such as the use of straw bales and seed can also result in the inadvertent introduction of invasive plants within the BSA and beyond. Implementation of the following mitigation measure would reduce the impact to a **less than significant** level by ensuring that equipment and vehicles are weed free before entry into the project area, and that weed free erosion control measures are in place by the fall of the final construction season.

**Mitigation Measure 6Z:** *To minimize the risk of introducing additional non-native species into the area, weed-free erosion control applications shall be used. No dry-farmed straw will be used and certified weed-free straw shall be required where erosion control straw is to be used. In addition, hydro-seed mulch or any other erosion control application must also be certified weed-free. If a revegetation seed mix is to be used, the mix shall also be certified weed-free and contain native species appropriate for the project area.*

*All off-road equipment to be cleaned of potential noxious weed sources (mud, vegetation) before entry onto the construction area, to help ensure noxious weeds are not introduced into the project area. The contractor shall employ whatever cleaning methods (typically with the use of a high-pressure water hose) as necessary to ensure that equipment is free of noxious weeds. Equipment shall be considered free of soil, seeds, and other such debris when a visual inspection does not disclose such material. Disassembly of equipment components or specialized inspection tools is not required.*

**Response f):** The proposed project is not subject to an adopted HCP or NCCP. Implementation of the proposed project will have **no impact** relative to this issue.

*V. CULTURAL RESOURCES*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?		X		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?		X		
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		
d) Disturb any human remains, including those interred outside of formal cemeteries?		X		

*BACKGROUND*

The North Central Information Center of the California Historical Resources Information System conducted a record search for Segment 1 (Main Street and Ray Lawyer Drive) on January 7, 2013. No known or previously recorded prehistoric or historic cultural resources were noted within the project APE. A field survey of this segment was performed on January 10, 2013, by Robert Gerry of Peak & Associates. No known or previously recorded prehistoric or historic cultural resources were noted within the project APE.

Segment 2 (Clay Street and Bedford Avenue) was included in a records search performed on August 1, 2007, by North Central Information Center of the California Historical Resources Information System. No known or previously recorded prehistoric or historic cultural resources were noted within the project APE. A field survey of this segment was performed on June 8, 2009 by John Lopez and Kim Tremaine. No known or previously recorded prehistoric or historic cultural resources were noted within the project APE.

*RESPONSES TO CHECKLIST QUESTIONS*

**Response a-c):** Records searches and field surveys have not revealed any evidence of historical, archaeological, or paleontological resources on Segment 1 (Main Street and Ray Lawyer Drive) or Segment 2 (Clay Street and Bedford Avenue). Segment 1 was previously disturbed in association with the construction of the railroad, as well as the decommissioning of the railroad for its current use. Segment 2 was previously disturbed in association with the Highway 50 Ops project. There was no evidence of historical, archaeological, or paleontological resources in association with these disturbance activities. The following mitigation measure addresses actions required in the event that previously unknown cultural resources are encountered during construction activities. This mitigation measure would ensure that this impact to **less than significant**.

**Mitigation Measure 78:** *If cultural resources (i.e., prehistoric sites, historic sites, and isolated artifacts and features) are discovered work shall be halted immediately within 50 meters (165 feet) of the discovery, the*

*City of Placerville shall be notified, and a qualified archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology shall be retained to determine the significance of the discovery.*

*The City of Placerville shall consider mitigation recommendations presented by the professional archaeologist for any unanticipated discoveries and shall carry out the measures deemed feasible and appropriate. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures.*

**Responses d):** Indications from historical records searches and archaeological discoveries indicate that humans have occupied many regions of California for thousands of years and it is not always possible to predict where human remains may occur outside of formal burials. Therefore, excavation and construction activities, regardless of depth, may yield human remains that may not be marked in formal burials. Under CEQA, human remains are protected under the definition of archaeological materials as being “any evidence of human activity.” Additionally, Public Resources Code Section 5097 has specific stop-work and notification procedures to follow in the event that human remains are inadvertently discovered during project implementation. Implementation of the following mitigation measure would ensure that, in the event of an inadvertent discovery of human remains, the City of Placerville implement state required consultation methods to determine the disposition and historical significance of any discovered human remains. Adherence to the following mitigation measure would ensure that this impact would be **less than significant**.

**Mitigation Measure 89:** *If human remains are discovered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to their origin and disposition pursuant to Public Resource code Section 5097.98. If the Coroner determines that no investigation of the cause of death is required, and if the remains are of Native American origin, the Coroner will notify the Native American Heritage Commission, which in turn will inform a most likely descendent. The descendent will then recommend to the landowner appropriate disposition of the remains and any grave goods.*

*VI. GEOLOGY AND SOILS*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X

*RESPONSES TO CHECKLIST QUESTIONS*

**Responses a.i), a.ii):** No known active or potentially active faults cross the City of Placerville. The City is not located in a Fault-Rupture Hazard Zone as established by the Alquist-Priolo Earthquake Fault Zoning Act; therefore, ground rupture from faulting is not considered a significant hazard. Part of the Rescue Lineament–Bear Mountains fault zone is located approximately 8.0 mi west of the project area and is classified as potentially active. The proposed project does not include habitable structures that would pose risks to people under seismic events. Implementation of the proposed project would result in a **less-than-significant** impact relative to this issue.

**Responses a.iii), c):** Liquefaction normally occurs when sites underlain by saturated, loose to medium dense, granular soils are subjected to relatively high ground shaking. During an

earthquake, ground shaking may cause certain types of soil deposits to lose shear strength, resulting in ground settlement, oscillation, loss of bearing capacity, landsliding, and the buoyant rise of buried structures. The majority of liquefaction hazards are associated with sandy soils, silty soils of low plasticity, and some gravelly soils. Cohesive soils are generally not considered to be susceptible to liquefaction.

There are some areas of Placerville that may, under seismic shaking, be susceptible to densification or liquefaction during periods of high water. However, the overall potential in Placerville for seismically induced hazards, such as soils liquefaction, lateral spreading, and densification is low and such conditions are not expected to pose a substantial concern for the proposed project considering there are no inhabitable structures proposed. Implementation of the proposed project would result in a **less-than-significant** impact relative to this issue.

**a.iv):** Topography in the vicinity of Segment 2 is generally flat and is not expected to result in or expose people to landslides or mudflows in this area. Topography in the vicinity of Segment 1 is sloped and has a higher risk of landslides. In this area there will be an ongoing potential for the soils to be or become unstable and result in landslides at some time. However, the overall potential for landslides is not expected to pose a substantial concern for the proposed project considering there are no inhabitable structures proposed. Implementation of the proposed project would result in a **less-than-significant** impact relative to this issue.

**Response b):** Construction activities would involve some land clearing, grading, and other ground-disturbing activities that could temporarily increase soil erosion rates during and shortly after project construction. Construction-related erosion could result in the loss of topsoil and could adversely affect water quality in nearby surface waters.

The RWQCB requires a project specific Storm Water Pollution Prevention Plan (SWPPP) to be prepared for each project that disturbs an area one acre or larger. The SWPPPs will include project specific best management measures that are designed to control drainage and erosion. A mitigation measure presented in Section IX Hydrology and Water Quality addresses the requirement for a SWPPP. Additionally, each segment includes drainage plans that are engineered to control storm water runoff and erosion, both during and after construction. The SWPPP and the project specific drainage plans would ensure that the potential for erosion is reduced. Implementation of the proposed project would result in a **less-than-significant** impact on soil erosion.

**Response d):** Segment 1 is underlain with engineered soils and/or rock base from the construction of the railroad almost 100 years ago. Segment 2 is underlain by soils that have been disturbed by more than 100 years of urban development. Neither segment would expose people or structures to expansive soils. Implementation of the proposed project will have **no impact** relative to this issue.

**Response e):** The proposed project does not involve the use or construction of a septic system. Implementation of the proposed project will have **no impact** relative to this issue.

*VII. GREENHOUSE GAS EMISSIONS*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?			X	

*RESPONSES TO CHECKLIST QUESTIONS*

**Response a-b):** The El Dorado County Transportation Commission (EDCTC) is the designated RTPA in El Dorado County. EDCTC has worked with the City of Placerville and other local communities on the proposed project to ensure that it implements numerous goals related to the increase in non-motorized transportation options, which reduce dependence on the automobile, and may subsequently result in decreases in total VMT per capita throughout the region. The proposed project is intended to improve access to transportation alternatives and would also increase the effectiveness of existing multi-modal transportation options in the County.

Implementation of the proposed project would not result in a direct increase in VMT within the City of Placerville or El Dorado County, and would not directly lead to increased population growth that could generate new greenhouse gas emissions. The proposed project is a bike and pedestrian improvement project that is intended to reduce VMT per capita to the extent feasible. The proposed project is consistent with the El Dorado County Regional Transportation Plan, including the goals and policies aimed at addressing greenhouse gas emissions. There would be temporary emissions of greenhouse gases associated with construction activities; however, the proposed project is consistent with the statewide goal of reducing GHGs and would not violate any applicable greenhouse gas reduction plan or program. This is a **less than significant** impact.

**VIII. HAZARDS AND HAZARDOUS MATERIALS**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X

**RESPONSES TO CHECKLIST QUESTIONS**

**Response a-c):** The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Once complete, the proposed project would not include operations or activities that would use, store or transport hazardous materials. During construction activities, small amounts of common construction materials, such as diesel fuel, would be used on the site. However, construction activities would be temporary and would not involve the use of extremely hazardous materials, other than common petroleum products.

Additionally, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Implementation of the proposed project will have a **less than significant** impact relative to this issue.

**Response d):** An Initial Site Assessment (ISA) was prepared for the project (Adanta, 2013) to determine the presence of contaminants on the site. No known contaminants were discovered within the project area during records searches and field visits conducted during preparation of the ISA. The proposed project is not located on an active clean-up or remediation site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The ISA noted past sites within the project area that required clean-up activities, however, all of these sites have been properly remediated and no further cleanup activity is required. There is always a possibility for aerially deposited lead concentrations and other contaminations adjacent to roadways and railroad corridors in California. However, the proposed project does not require extensive grading activities because of the existing grades and existing trail use on the project site. Implementation of the proposed project will have a **less than significant** impact relative to this issue.

**Responses e), f):** The proposed project would not create new safety hazards for people in association with airports/airstrips. Implementation of the proposed project will have **no impact** relative to this issue.

**Response g):** Construction of the proposed project would not result in temporary road closures or traffic detours that could affect emergency access. The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Implementation of the proposed project will have **no impact** relative to this issue.

**Response h):** The proposed project would not result in the construction of structures that would be occupied by humans; therefore, it would not expose people or structures to a significant risk involving wild fires. Implementation of the proposed project will have **no impact** relative to this issue.

**IX. HYDROLOGY AND WATER QUALITY**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Violate any water quality standards or waste discharge requirements?			X	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			X	
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X	
f) Otherwise substantially degrade water quality?			X	
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				X
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X
j) Inundation by seiche, tsunami, or mudflow?				X

**RESPONSES TO CHECKLIST QUESTIONS**

**Responses a, c-f):** Implementation of proposed project would not violate any waste discharge requirements. The proposed project would slightly alter the existing drainage of the trail segments

to ensure proper drainage of the trail segments; however, the drainage design would not result in the alteration of a course of a stream or river, which could result in erosion, siltation, or flooding on- or off-site.

The construction phase of the projects could cause storm water runoff that could carry topsoil into downstream waterways and ultimately waters of the U.S. As required by the Clean Water Act, each segment will require an approved Storm Water Pollution Prevention Plan (SWPPP) that includes best management practices for grading, and preservation of topsoil. SWPPPs are designed to control storm water quality degradation to the extent practicable using best management practices during and after construction.

The City of Placerville will submit the SWPPP with a Notice of Intent to the Regional Water Quality Control Board (RWQCB) to obtain a General Permit. The RWQCB is an agency responsible for reviewing the SWPPP with the Notice of Intent, prior to issuance of a General Permit for the discharge of storm water during construction activities. The RWQCB accepts General Permit applications (with the SWPPP and Notice of Intent) after specific projects have been approved by the lead agency. For each segment, the City of Placerville is required to obtain a General Permit for discharge of storm water during construction activities prior to commencing construction (per the Clean Water Act). Construction of each segment would be required to comply with NPDES General Construction Permit requirements to reduce or eliminate construction-related water quality effects. With NPDES compliance the proposed project would have a **less-than-significant** impact.

**Responses b):** The proposed project does not create a new demand on water supplies. As such, the proposed project does not substantially deplete groundwater supplies. Additionally, the proposed project would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Implementation of the proposed project will have **no impact** relative to this issue.

**Responses g-j):** Implementation of the proposed project would not place housing within a 100-year flood hazard area, place structures which would impede or redirect flood flows within a 100-year flood hazard area, nor would it expose people or structures to a significant risk of loss, injury or death involving flooding (including flooding as a result of the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow). Implementation of the proposed project will have **no impact** relative to this issue.

***X. LAND USE AND PLANNING***

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X	
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

***RESPONSES TO CHECKLIST QUESTIONS***

**Responses a):** The proposed project does not physically divide an established community. Implementation of the proposed project will have **no impact** relative to this issue.

**Responses b):** The proposed project would not change the land uses or result in incompatibility with the policies identified in the City’s General Plan. The proposed project includes two segments of the El Dorado Trail that are programed within the El Dorado County Regional Transportation Plan. Implementation of the proposed project would have a **less than significant** impact relative to this issue.

**Response c):** The proposed project does not conflict with any applicable habitat conservation plan or natural community conservation plan located within the City of Placerville. Implementation of the proposed project will have **no impact** relative to this issue.

*XI. MINERAL RESOURCES*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				x
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				x

*RESPONSES TO CHECKLIST QUESTIONS*

**Responses a), b):** The project site is not currently, and has not historically, been used as a mineral resource recovery site. The proposed project will not result in the loss of availability of a mineral resource. Implementation of the proposed project will have **no impact** relative to this issue.

*XII. NOISE*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			x	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				X
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				x
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				x

*RESPONSES TO CHECKLIST QUESTIONS*

**Responses a, c):** The proposed project does not result in new sources of permanent noise (i.e. traffic noise, stationary equipment, etc.). Implementation of the proposed project will have **no impact** relative to this issue.

**Responses: b, d):** Increases in ambient noise levels associated with construction projects located near sensitive land uses can result in increased levels of annoyance. Construction activities occurring during the more noise-sensitive nighttime hours would be of particular concern, given the potential for increased sleep disruption. The City of Placerville limits construction to the daytime hours and requires equipment to be properly maintained and muffled. The City’s has standard minimization measures required under the General Plan Noise Element. Implementation of these standard minimization measures would ensure that this impact is **less-than-significant**.

**Responses: e), f):** The proposed project would not expose people to excessive noise levels associated with airports/airstrips. Implementation of the proposed project will have **no impact** relative to this issue.

*XIII. POPULATION AND HOUSING*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				x
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				x
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				x

*RESPONSES TO CHECKLIST QUESTIONS*

**Response a):** The proposed project does not involve approvals associated with any development projects, and does not provide infrastructure that could facilitate additional development in the region. The proposed project would not induce growth directly or indirectly. The proposed project would not displace substantial numbers of housing units or people. Implementation of the proposed project will have **no impact** relative to this issue.

*XIV. PUBLIC SERVICES*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:			X	
Fire protection?			X	
Police protection?			X	
Schools?			X	
Parks?			X	
Other public facilities?			X	

*RESPONSES TO CHECKLIST QUESTIONS*

**Responses a), b), c), d), e):** The proposed improvements would not result in substantial adverse physical or environmental impacts related the provision of public services. Project implementation may increase the demand for police patrols along trail segments, however, the increased demand for police patrols generated by the project would not result in the need to construct additional police facilities, nor would it cause a significant decrease in police protection services in other areas of the City of Placerville. The project would result in a **less than significant** impact to this environmental topic.

*XV. RECREATION*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

*RESPONSES TO CHECKLIST QUESTIONS*

**Response a-b):** The proposed project includes the construction of two segments of the mixed-use El Dorado Trail. Extension of the El Dorado Trail in these areas 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. Extension of the trail may increase usage of the trail by the local and regional population; however, it is not anticipated to result in substantial physical deterioration of the El Dorado Trail, or any other recreational facility.

The design of Segment 2 (Clay Street and Bedford Avenue) may eliminate a handicapped-accessible viewing area overlooking Hangtown Creek at the north edge of the Ivy House parking lot; however, this proposed segment provides handicapped accessible viewing opportunities of the creek corridor to offset the loss of the existing viewing area.

The proposed project has been initiated by the City in order to provide new and improve existing recreational facilities for citizens. Implementation of the proposed project will have a **less than significant** impact relative to these issues.

*XVI. TRANSPORTATION/TRAFFIC*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) 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?				X
b) 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?				X
c) 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?				X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
e) Result in inadequate emergency access?				X
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				X

*RESPONSES TO CHECKLIST QUESTIONS*

**Responses a-f):** The proposed project would not increase traffic, cause an exceedance of a level of service, change air traffic patterns, increase hazards due to design features, or result in inadequate emergency access. The proposed project is consistent with policies, plans, and programs that support alternative transportation, including the most recently adopted El Dorado County Regional Transportation Plan. Implementation of the proposed project will have **no impact** relative to these issues.

*XVII. UTILITIES AND SERVICE SYSTEMS*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				X
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments?				X
f) Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs?				X
g) Comply with federal, state, and local statutes and regulations related to solid waste?				X

*RESPONSES TO CHECKLIST QUESTIONS*

**Responses a-b), d-g):** The City of Placerville has an elaborate network of public utilities and services, such as water, wastewater, and solid waste collection and disposal. The proposed project does not require the use of these utilities or infrastructure and would not result in the expansion of utilities or infrastructure. Implementation of the proposed project will have **no impact** relative to this issue.

**Response c):** The proposed project would result in additional impervious services and increased stormwater runoff. City policies and federal and state laws provide various requirements relative to storm drainage management. Each trail segment will include a drainage design to ensure proper drainage of the trail segments. The drainage design will largely maintain the existing drainage, but may also require some culverts, pipes, biofilters, swales, etc. to control runoff and prevent flooding, erosion, and sedimentation. The construction of the proposed project will require the City to submit a SWPPP with a Notice of Intent to the Regional Water Quality Control Board (RWQCB) to obtain a

General Permit. Construction of each segment would be required to comply with NPDES General Construction Permit requirements to reduce or eliminate construction-related water quality effects. With NPDES compliance the proposed project would have a **less-than-significant** impact.

*XVIII. MANDATORY FINDINGS OF SIGNIFICANCE*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		X		
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

*RESPONSES TO CHECKLIST QUESTIONS*

**Responses a-c):** As described throughout the analysis above, the proposed project will not result in any changes to General Plan land use designations or zoning districts, would not result in annexation of land, and would not allow new land use development. The project would not threaten a significant biological resource, nor would it eliminate important examples California history or prehistory. The proposed project does not have impacts that are cumulatively considerable, nor would it have substantial adverse effects on human beings. Several mitigation measures are presented throughout this document. With the implementation of these mitigation measures, the proposed project would have a **less than significant** impact on these environmental topics.

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## RESPONSE TO COMMENTS

### INTRODUCTION

The City of Placerville received two (2) comment letters during the Initial Study/Mitigated Negative Declaration public review period. The comments do not involve any new significant impacts or “significant new information” that would require recirculation of the environmental document pursuant to the CEQA Guidelines. Acting as lead agency, the City of Placerville has prepared the following response to comments. The following table lists the comments that were submitted to the City.

Response Letter/ Number	Individual or Signatory	Affiliation	Date
A	Trevor Cleak	Central Valley Regional Water Quality Control Board	3/1/2013
B	Michael Drobesh	City of Placerville Citizen	3/6/2013

### COMMENTS AND RESPONSES

CEQA Guidelines requires that lead agencies evaluate and respond to all comments on the environmental document that consider an environmental issue. The written response must address the significant environmental issue raised and provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need to only respond to significant environmental issues associated with the project and do not need to provide all the information requested by the commentor, as long as a good faith effort at full disclosure is made in the environmental document.

CEQA Guidelines Section recommends that commentors provide detailed comments that focus on the sufficiency of the environmental document in identifying and analyzing the possible environmental impacts of the project and ways to avoid or mitigate the significant effects of the project, and that commentors provide evidence supporting their comments. Pursuant to CEQA Guidelines, an effect shall not be considered significant in the absence of substantial evidence.



**Central Valley Regional Water Quality Control Board**

1 March 2013

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MAR 09 2013

CITY OF PLACERVILLE  
COMMUNITY DEV. DEPT.

Nate Stong  
City of Placerville  
3101 Center Street  
Placerville, CA 95667

CERTIFIED MAIL  
7012 0470 0000 9904 4717

**COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT MITIGATED NEGATIVE DECLARATION, EL DORADO TRAIL PROJECTS: RAY LAWYER DRIVE TO MAIN STREET AND CLAY STREET TO BEDFORD AVENUE PROJECT, SCH NO. 2013022010, EL DORADO COUNTY**

Pursuant to the State Clearinghouse's 4 February 2013 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Mitigated Negative Declaration* for the El Dorado Trail Projects: Ray Lawyer Drive to Main Street and Clay Street to Bedford Avenue Project, located in El Dorado County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

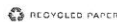
**Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:  
[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml).

A-1

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER  
11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | [www.waterboards.ca.gov/centralvalley](http://www.waterboards.ca.gov/centralvalley)



El Dorado Trail Projects: Ray Lawyer Drive to Main- 2 -  
Street and Clay Street to Bedford Avenue Project  
El Dorado County

1 March 2013

**Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

A-2

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/).

**Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

A-3

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml).

**Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

A-4

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

El Dorado Trail Projects: Ray Lawyer Drive to Main- 3 -  
Street and Clay Street to Bedford Avenue Project  
El Dorado County

1 March 2013

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACOE permit, or any other federal permit, is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

A-5

**Waste Discharge Requirements**

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

A-6

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/help/business\\_help/permit2.shtml](http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml).

If you have questions regarding these comments, please contact me at (916) 464-4684 or [tcleak@waterboards.ca.gov](mailto:tcleak@waterboards.ca.gov).

  
for Trevor Cleak  
Environmental Scientist

cc: State Clearinghouse Unit, Governor's Office of Planning and Research, Sacramento

## **Response to Letter A Trevor Cleak, Regional Water Quality Control Board**

### **Comment A-1 Construction Storm Water General Permit**

The commentor identifies construction stormwater permit requirements for projects that disturb one or more acres of soil or are part of a larger plan that in total disturbs one or more acres of soil. The Initial Study adequately addresses this topic on pages 43-44. This comment is noted. No further response is necessary.

### **Comment A-2 Phase 1 and II Municipal Separate Storm Sewer System (MS4) Permits**

The commentor discusses Best Management Practices and MS4 requirements for storm drainage systems. The City of Placerville has been designated by the Regional Water Quality Control Board (RWQCB) as an owner/operator of an MS4. The General MS4 Permit required the City to:

- Submit a Notice of Intent to comply with the terms of the Small MS4 General Permit to the RWQCB;
- Develop a Storm Water Management Plan that includes BMPs that address six program areas;
- Conduct construction site inspections to verify that BMPs are implemented/
- Conduct surveillance monitoring to confirm illicit non-storm discharges are detected and eliminated; and
- Submit annual reports to the RWQCB describing progress in SWMP implementation;

The City has, and continues to, fulfill the MS4 permit requirements. The City operates their MS4 under the *City of Placerville Storm Water Management Plan* (2005). The proposed project is subject to these standard City requirements. This comment is noted. No further response is necessary.

### **Comment A-3 Industrial Storm Water General Permit**

The commentor discusses Industrial Storm Water General Permit requirements. The proposed project is not a land use plan or proposal for development, and does not include industrial uses. As such, Industrial Storm Water General Permits are not relevant to the proposed project. No further response is necessary.

### **Comment A-4 Clean Water Act Section 404**

The commentor indicates that a Section 404 permit from the U.S. Army Corps of Engineers would be required for activities involving a discharge to waters of the U.S. The Initial Study adequately addresses this issue on page 34. This comment is noted. No further response is necessary.

### **Comment A-5 Clean Water Act Section 401 – Water Quality Certification**

The commentor indicates that a Section 401 Water Quality Certification from the State Board would be required for activities that require a Section 404 permit or other federal permits. The Initial

Study adequately addresses this issue on page 34. This comment is noted. No further response is necessary.

Comment A-6 Waste Discharge Permit

The commentor indicates that if the U.S. Army Corps of Engineers determines that only non-jurisdictional waters from the State occur, then the project would require a Waste Discharge Permit issued from the Regional Water Quality Control Board pursuant to the Porter-Cologne Water Quality Control Act. These permit requirements are noted as a requirement for all projects that discharge into State water, including but not limited to, isolated wetlands. The Initial Study adequately addresses this issue on page 34. This comment is noted. No further response is necessary.

Trail section 1

- |  |     |
|--|-----|
| 1) There are many young trees and brush that have overgrown the edge of the rail bed. This poses a risk to public safety, whereas an attacker could easily hide at arms length, without being seen in time. Thinning, limbing and cutting of many of these seems prudent, in order to gain an improved line of sight and an increased sense of security for trail users. This is a long and isolated section, with numerous homeless camps along the route, which also must be dealt with. | B-1 |
| 2) Additional brush along the trail may need to be considered for removal or chipping, to address potential fire hazards.  | B-2 |
| 3) At least one culvert drains down the bank and onto the rail bed, creating ice problems in winter. (South side of trail, coming from Forni road.)  | B-3 |
| 4) There are wide(er) areas next to the rail bed in several locations. Grading these areas during the project would benefit future additions such as picnic tables, trash cans, etc.   | B-4 |
| 5) The community's Development Guide, strongly discourages naked concrete retaining walls. Please include some form of beautification, whether it is stamped wood grain, colored, simulated stone or brick, etc. This comes at an increased cost, but naked concrete screams out for graffiti. And an attractive retaining wall may encourage greater community pride.   | B-5 |

Thank you for your consideration and bringing forward this beneficial project,  
Michael Drobesh  
Citizen of Placerville

RS, IS THERE A TYPO ON PG 3 MIND? 2<sup>ND</sup> TO LAST PARA.  
LOOKS LIKE "MORE THAN" SHOULD BE "LESS THAN" ?

RECEIVED B-6  
MAR 06 2013  
CITY OF PLACERVILLE  
COMMUNITY DEVELOPMENT

This is an exciting project that I whole heartedly support. Numerous benefits to the community will occur, including, but not limited to; connecting parts of a segmented trail thereby increasing public use, expanded exercise & health benefits, increased property values, etc.

B-7

After walking the proposed trail sections, a few thoughts came to mind that may, or may not, need to be addressed in the MND/IS. Let the professionals decide.

Trail section 2

- 1) It is of paramount importance that all measures necessary, be taken to protect the mature redwood tree at the Clay st. bridge/Hwy 50/trail intersection. This community resource nearly died due to recent past Hwy 50 & Main st. construction work. (soil compaction) Please consult a professional arborist to determine proper protection. A heavy fine, such as, if the tree dies within 2 years after construction, may improve protection mentality. BTW, our City Code/Development Guide restricts construction within the drip line of certain trees.
- 2) Given that a potential future pedestrian creek crossing at Bedford (upstream side and adjacent to the vehicle bridge, between the pedestrian over crossing and the District Attorney's office) might be beneficial. Could such a crossing be included in this analysis so that when/if future funding becomes available, the CEQA work will already be done.
- 3) It might be wise to include an asphalt curb (or other solution) at the edge of the trail, on the creek side, thereby minimizing trash, pet leavings, etc from entering the creek from the trail.

B-8

B-9

B-10

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COMMUNITY DEV. DEPT.

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## **Response to Letter B Michael Drobesh, Citizen**

### **Comment B-1 Trail Section 1**

The commentor identifies that there are many young trees and brush that have overgrown the edge of the rail bed and indicates that this poses a risk to public safety, whereas an attacker could easily hide at arms-length, without being seen in time. The commentor suggests thinning, limbing and cutting of many of these seems prudent, in order to gain an improved line of sight and an increased sense of security for trail users. The commentor notes that this is a long and isolated section, with numerous homeless camps along the route, which also must be dealt with.

This comment warrants design modifications and enhancements to ensure public health and safety. This comment is addressed with additional text and a new mitigation measure on Page 33-34 of the Initial Study:

**Responses b):** There is riparian habitat in the drainage that is immediately adjacent to the eastern terminus of Segment 1. There is also riparian habitat along Hangtown Creek, which is adjacent to entire length of Segment 2. The design of both segments avoid direct disturbance to the riparian habitat or the associated drainage/creek.

There is montane hardwood-conifer forest habitat along the entire length of Segment 1, and in a few remnant patches along Segment 2. The original design of both segments avoid direct disturbance to the montane hardwood-conifer forest habitat. However, comments received during the 30-day public review period note that the many young trees and brush that have overgrown the edge of the rail bed along this Segment 1 poses a risk to public health and safety due to the fact that an attacker could easily hide at arms-length, without being seen in time to avoid or defend against the attacker. Comments indicated that this is a long and isolated section, with numerous homeless camps along the route, which also must be dealt with by the City. These comments warrant design modifications and enhancements by the City to ensure public health and safety is maintained to the greatest extent feasible along Segment 1. Such design modifications and enhancements include thinning, limbing and cutting of trees along Segment 1 in order to gain an improved line of sight and an increased sense of security for trail users. Additionally, design modifications and enhancements require the elimination of the switchback ADA ramp at the western end of Segment 1 and the replacement of a direct/straight route with an ADA compliant grade/slope that will require additional fill and removal of some trees to accommodate the fill. These design modifications and enhancements have the potential to cause an impact to trees; however, with the implementation of a mitigation measure the potential impact is reduced to a less than significant level.

Implementation of Mitigation Measure 4 (previously presented) and Mitigation Measure 6 would ensure that the potential impact to riparian forest and montane hardwood-conifer forest habitat is reduced to a **less than significant** level.

**Mitigation Measure 6:** Prior to final design and improvement plan approval, the Public Works Department shall coordinate with the Police Department to ensure that the design and improvement plans, including any shrub removal, tree thinning, limbing, and removal, accommodates adequate sightlines for trail user safety. In addition, the Public Works Department shall coordinate with the Fire Department to ensure that the design and improvement plans, including any shrub removal, tree thinning, limbing, and removal, accommodates adequate fire hazard control. If the plans will require tree removal, such removal shall be evaluated and documented in a report prepared by a certified arborist or registered professional forester. Any tree removal shall include replacement of the same tree species at a 3:1 ratio.

### **Comment B-2 Trail Section 1**

The commentor notes that additional brush along the trail may need to be considered for removal or chipping, to address potential fire hazards.

This comment is addressed under Comment B-1 above. No further response is necessary.

### **Comment B-3 Trail Section 1**

The commentor notes that at least one culvert drains down the bank and onto the rail bed, creating ice problems in winter. The commentor references the problem location as “South side of trail, coming from Forni road.”

The proposed design includes storm drainage engineering that will manage storm water flows such that ponding on the existing trail will be eliminated. This comment noted and will be addressed through design and improvement plans.

Comment B-4 Trail Section 1

The commentor notes that there are “wide(er) areas next to the rail bed in several locations. Grading these areas during the project would benefit future additions such as picnic tables, trash cans, etc.”

This comment is a design consideration for the City of Placerville to consider. This comment does not raise an environmental issue. No further response is necessary.

Comment B-5 Trail Section 1

The commentor cites the “community's Development Guide” and states that it “strongly discourages naked concrete retaining walls.” The commentor requests that the project include some form of beautification, whether it is stamped wood grain, colored, simulated stone or brick, etc. The commentor acknowledges that this comes at an increased cost, but notes that naked concrete screams out for graffiti. And an attractive retaining wall may encourage greater community pride.

This comment is a design consideration for the City of Placerville to consider. This comment does not raise an environmental issue. No further response is necessary.

Comment B-6 Trail Section 1

The commentor suggests that there is a typo on Page 3 of the MND in the second to last paragraph. The commentor indicates that the reference to “more than” should be “less than.”

This comment is noted; however, the language is directly from the El Dorado County Air Pollution Control District CEQA Guide and is assumed to be accurate. No further response is necessary.

Comment B-7 Trail Section 2

The commentor notes that this is an “exciting project that I whole heartedly support.” The commentor notes that “Numerous benefits to the community will occur, including, but not limited to; connecting parts of a segmented trail thereby increasing public use, expanded exercise & health benefits, increased property values, etc.” The commentor notes that “After walking the proposed trail sections, a few thoughts came to mind that may, or may not, need to be addressed in the MND/IS. Let the professionals decide.”

This comment reflects the commentor’s support for the project and serves as an introduction to the comments regarding Segment 2. This comment does not raise an environmental issue. No further response is necessary.

### Comment B-8 Trail Section 2

The commentor states that it is of paramount importance that all measures necessary, be taken to protect the mature redwood tree at the Clay Street bridge/Hwy 50/trail intersection. The commentor notes that “This community resource nearly died due to recent past Hwy 50 & Main Street construction work (soil compaction).” The commentor requests that the City consult a professional arborist to determine proper protection. Additionally, the commentor suggests that a heavy fine be assessed if the tree dies within two years of construction. The commentor notes that the City Code Development Guide restricts construction within the drip line of certain trees.

This comment is noted. The tree in question is a coast redwood (*Sequoia sempervirens*), which is not a native species of tree within the region. This coast redwood is native to the coast of California and southern Oregon in mountains where precipitation from the incoming moisture off the ocean is greater, and where fog drip is common. Healthy trees have dark green foliage, and annually have new shoots that are light green. This species is regularly planted as an ornamental tree in areas outside its native range because of the speed at which they grow; however, without a special microclimate that emulates their native habitat they usually do not succeed as they would in their native habitat.

The tree in question is a mature tree that is likely 50 to 100 years old. The tree is not currently in good health, as evidenced by its yellowish-green foliage. The reasons for the lack of health can be very wide ranging and is not fully known. The reasons for poor tree health likely include the Clay Street and US 50 improvements being immediately adjacent to the tree. Improvements such as these generally damage roots systems, which ultimately decreases tree health. It cannot be predicted whether this tree will survive regardless of the proposed improvements to the El Dorado Trail at this location. The construction activities associated with the El Dorado Trail could exacerbate the health problems of this tree. Coast redwood is not a protected tree species in the foothills of the Sierra Nevada, including the City of Placerville and the cultural evaluation of the project did not identify this tree as a historical resource that requires protection. While this tree is not specifically protected and there is no legal nexus to assess a fine if the tree fails, the City of Placerville does not intend to cause damage to this tree by constructing the El Dorado Trail for its citizens. The City will identify and implement all reasonable measures to minimize additional impacts to this tree.

### Comment B-9 Trail Section 2

The commentor states that a potential future pedestrian creek crossing at Bedford might be beneficial. The commentor asks if such a crossing could be included in this analysis so that when/if future funding becomes available, the CEQA work will already be done.

A future pedestrian creek crossing at Bedford is not contemplated at this time. As such, details of such a crossing are not available, nor ripe, for environmental review. The design that is proposed at this time is what has been analyzed in this CEQA document. If the City decides to pursue additional improvements, including those suggested by the commentor, CEQA will be required.

### Comment B-10 Trail Section 2

The commentor states that “It might be wise to include an asphalt curb (or other solution) at the edge of the trail, on the creek side, thereby minimizing trash, pet leavings, etc. from entering the creek from the trail.”

This comment is a design consideration for the City of Placerville to consider. The design will be required to comply with the standard BMPs contained with the City of Placerville Storm Water Management Plan (2005), which is addressed under a previous comment (See Comment A-2). No further response is necessary.