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FEDERAL NUMBER: BRCMLO-5015 (011)

CLAY STREET BRIDGE (25C-0117) REPLACEMENT PROJECT

Recirculated Environmental Impact Report (REIR)

OCTOBER 13, 2026

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Available on USB at the City of Placerville Engineering Department and online at https://www.cityofplacerville.org/clay-street-bridge

Appendix A: Notice of Preparation (NOP)/Initial Study (IS) and Comments

Appendix B: Peremptory Writ of Mandate

Appendix C: Clay Street Bridge Materials Testing

Appendix D: Air Quality and GHG Modeling

Appendix E: Office of Historic Preservation (OHP) Correspondence

Appendix F: List of Technical Studies

1. Executive Summary

This Executive Summary summarizes the requirements of the California Environmental Quality Act (CEQA) Statutes and Guidelines providing the reader an understanding of the existing bridge and site conditions; an overview of the proposed project and alternatives; identifies the purpose of this Recirculated Environmental Impact Report (REIR); outlines the potential impacts of the proposed project and the recommended mitigation measures; and discloses areas of focused considerations, challenges to be resolved, and potential resolutions.

1.1 Introduction

The Clay Street Bridge Replacement Project (proposed project) proposes to replace the existing Clay Street Bridge, which has an estimated construction year of 1926, does not meet current design and safety standards (previously identified as functionally obsolete by the Federal Highway Administration), and is now showing significant structural decomposition and decay.

This REIR has been prepared by the City of Placerville (City), who is the Lead Agency under CEQA. The REIR provides information to the public and the City's decisionmakers about the environmental setting; existing conditions of the site and bridge structure; impacts of the proposed project; and potentially feasible alternatives. The City decisionmakers may rely on the information contained in this document as well as evidence outside of it to make a determination as to whether to approve the project or one of the alternatives.

The REIR also provides information to meet the needs of local, State, and federal permitting agencies that are required to consider the environmental impacts of the proposed project in making their own subsequent permitting decisions about the project in their roles under CEQA as responsible and trustee agencies.

1.2 Project Summary and Existing Conditions

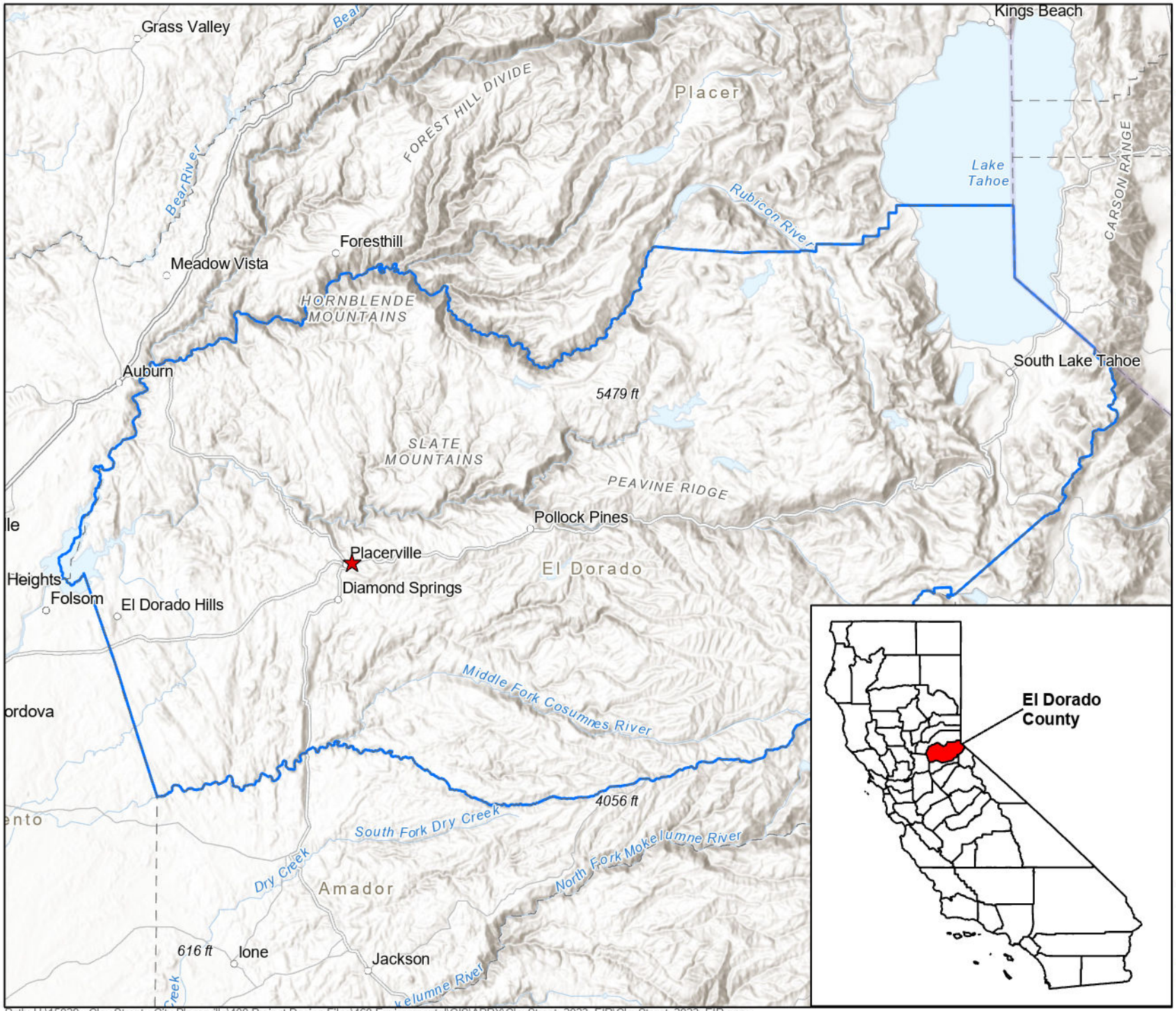
The proposed project is located in the City of Placerville, western portion of El Dorado County, California, along Main Street, Clay Street, and Cedar Ravine Road (**Figure 1.2-1, Regional Location**, and **Figure 1.2-2, Vicinity Map**). The total area of the proposed project is 1.39 acres. Within the limits of the proposed project, Main Street is a conventional two-lane, undivided minor arterial road with two 12-foot lanes and 2- to 4-foot non-standard shoulders. Cedar Ravine Road is a two-lane minor arterial road. Clay Street is currently classified as a two-lane local road by the City General Plan and the Federal Highway Administration (FHWA), connected to two minor arterial roads end to end at Main Street and Mosquito Road. The Clay Street Bridge, however, is a narrow single lane closed spandrel, earthen filled, concrete arch bridge that spans Hangtown Creek. Although this was once a very common style of bridge, it now falls significantly

short of meeting current design and safety standards. For this reason, the bridge was classified as functionally obsolete and has been deemed eligible for rehabilitation or replacement under the Highway Bridge Program (HBP) guidelines, which is a national bridge safety program.

In addition to concerns with the existing bridge, numerous concerns have been raised about the condition of the existing Cedar Ravine Culvert. The culvert starts at the intersection of Pacific Street and Cedar Ravine Road and runs south to north where it daylights at the Clay Street Bridge southern abutment. The culvert is made of various geometric shapes (arch, box, etc.) and made from various materials (concrete, bridge, corrugated steel). It also has a series of utilities that are sleeved through the culvert. The culvert has failed in the past and has been repaired several times, with the most recent repair in 2018 as part of the Pacific Street paving project when it was discovered that a portion of the culvert top was found unstable and was replaced as part of that work. Other more extensive repairs occurred in the 1970's, in 2003, and again in 2005. It is also important to note that the culvert runs directly adjacent to the footing of the Druid Monument located within the intersection of Main Street and Cedar Ravine Road, placing the monument in immediate danger of damage should the culvert fail at that location. Construction of the proposed also would include the potential replacement of the culvert.

The main objective of the proposed project is to provide a structurally sufficient and safe crossing over Hangtown Creek for all users that meets current safety, structural, and geometric standards, and that will provide adequate, reliable, and safe service for vehicular, pedestrian, and bicycle traffic.

Regional Location Map



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Clay Street Bridge Replacement Project

Figure 1.2-1

Legend

- Project Location
- El Dorado County

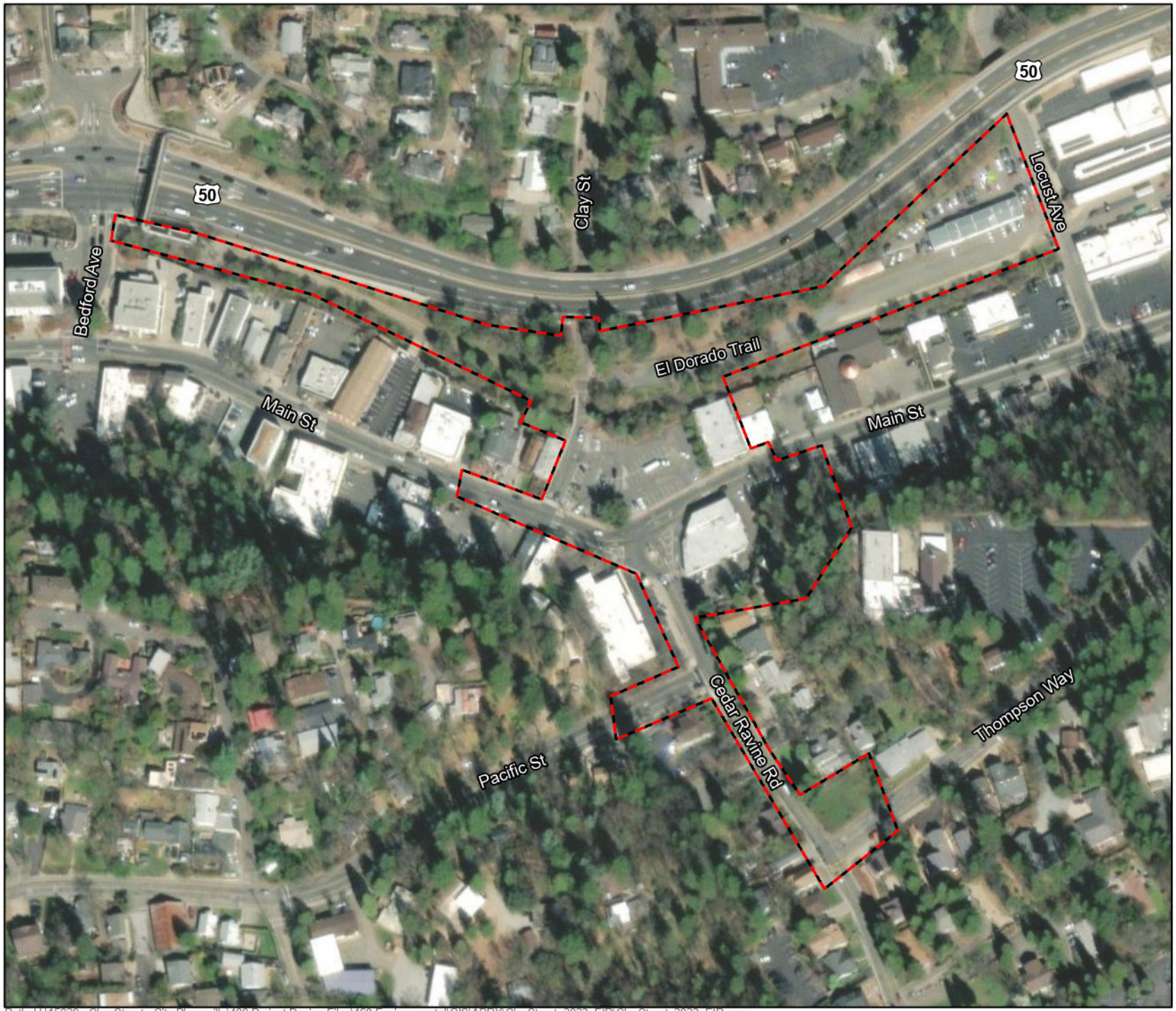
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Author: I. Ciraulo
Last updated on Friday, November 3, 2023

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Project Vicinity Map



Clay Street Bridge Replacement Project

Figure 1.2-2

Legend

Proposed Project Area

N

0 200 Feet

Author: I. Ciraulo
Last updated on Monday, January 22, 2024

Dewberry

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1.3 Purpose and Use of the Recirculated EIR

An EIR, and in this case an REIR, is a public informational document used for planning and decision-making purposes. As stipulated in CEQA Guidelines Section 15088.5, a lead agency is required to recirculate a Draft EIR when significant new information is added after public notice is given of the availability of a Draft EIR for public review, per CEQA Guidelines Section 15087, but before project approval and Final EIR certification. CEQA Guidelines Section 15088.5 states that the term "information" can include changes in the project or environmental setting as well as additional data, change in project approach and considerations, or other information.

The City published the Clay Street Hangtown Creek Bridge Replacement Project Draft Environmental Impact Report (original Draft EIR) on March 2, 2018 for a 45-day public review period ending April 18, 2018; since then, the City took no further action to certify the EIR or approve the proposed project. Since circulation of the original Draft EIR in 2018, the City received and heard a multitude of comments regarding the proposed project and decided to take a more conservative approach to the analysis of the City's historic resources through the assumption of a designated downtown historic district. This refined approach and new significant information to the design and project planning resulted in the identification of new technical information, and re-evaluation of potentially feasible alternatives. From that information, updates to sections of the original Draft EIR were necessary to provide consistency and clarity. Additionally, due to the time lapse since the 2018 circulation and changes in CEQA guidance, the City has determined that recirculation of the entire document would provide the public another formal opportunity to comment on the proposed project. The City acknowledges the contributions that the participants in the public comment process have made to date to refine the analysis for the REIR.

The City Council will consider the information presented in the Final REIR, including the public comments and staff responses to those comments, during the public hearing process. As a legislative action, the final decision is made by the City Council, who will first determine whether to certify the environmental document as adequate and complete, and then whether to approve the proposed project or reject it entirely. The purpose of this REIR is to identify:

- Significant potential impacts of the project on the environment and indicate the manner those impacts can be avoided or mitigated
- Any unavoidable adverse impacts that cannot be mitigated
- Reasonable and feasible alternatives to the project that would attain most of the basic project objectives while avoiding or substantially lessening any of the significant effects of the project

The REIR also considers and discloses potential impacts to various subject matter including but not limited to traffic, parking, urban decay, biological resources, cultural resources, hazardous materials, aesthetics, growth-inducing impacts, and planning consistency. Analysis of these issues were previously determined to be required in a

Peremptory Writ of Mandate issued by the El Dorado County Superior Court in February of 2012 in response to the previously prepared Mitigated Negative Declaration (MND) for the Clay Street/Cedar Ravine Realignment and Clay Street Bridge at Hangtown Creek Replacement Project (El Dorado County Superior Court, 2012).

Impacts are assessed and found to be either less than significant or potentially significant, including cumulative impacts of past, present, and reasonably foreseeable future projects (**Table 1.9-1**). CEQA requires an EIR to reflect the independent judgment of the lead agency regarding the impacts, the level of significance of the impacts both before and after mitigation, and mitigation measures proposed to reduce the impacts. An REIR is circulated to responsible agencies with permitting or jurisdictional authority over some aspects of the proposed project, trustee agencies with resources affected by the project, relevant federal agencies, interested organizations and individuals, including those that commented on the original Draft EIR. The purposes of public and agency review of a REIR include sharing expertise, disclosing agency analyses and new project information, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counterproposals.

Per CEQA Guidelines Section 15204, reviewers of this REIR are requested to focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the proposed project might be avoided or mitigated. Comments are most helpful when they provide suggestions, additional specific alternatives, or mitigation measures that would provide better ways to avoid or mitigate significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of the project record, including factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project.

This REIR is being distributed directly to agencies, organizations, and interested groups and persons, including those that commented on the original Draft EIR, for public review and comment for a 45-day period, in accordance with CEQA Guidelines Section 15087. The REIR process, including the means by which members of the public can comment on the REIR, is discussed further in **Chapter 2, Introduction**.

1.4 Project Overview

1.4.1 Project Setting

The proposed project is located in the City of Placerville, western portion of El Dorado County, California, along Main Street, Clay Street, and Cedar Ravine Road (refer to **Figure 1.2-1, Regional Location**, and **Figure 1.2-2, Vicinity Map**). The proposed project extends from U.S. Highway 50 (US 50) as an undercrossing and then continues due south over Hangtown Creek to Main Street and south along Cedar Ravine Road to the lower part of Cedar Ravine to the intersection of Pacific Street. The proposed project encompasses the Main Street/Cedar Ravine Road intersection as well as the Ivy

House parking lot on the north side of Main Street between Cedar Ravine Road and Clay Street The project site elevation ranges from approximately 1,865 feet at the creek channel to 1,925 feet at US 50 above mean sea level.

The proposed project area includes transportation facilities (Main Street, Clay Street, and Cedar Ravine Road) surrounded by general land uses of commercial, residential, and recreational. It is located in the furthest east end of the downtown historic area of the City and overlaps/abuts with two locally designated residential historic districts, the Bedford Avenue-Clay Street Historic Residential District and the Cedar Ravine Historic Residential District. The Clay Street Bridge currently accommodates one-lane shared vehicular and bicycle traffic for northbound and southbound movements. There is an at-grade sidewalk located on the west side of the Clay Street Bridge which allows pedestrians to access the El Dorado Trail and residential areas to the north. A monument to the California Druids (the Druid Monument), a local landmark, is located in the intersection of Main Street and Cedar Ravine Road. There is also a mature cork oak tree located in the Ivy House parking lot at the intersection of Main Street and Cedar Ravine Road.

1.4.2 Project Objectives

The CEQA Guidelines (Section 15124[b]) require the project description to contain a statement of objectives that includes the underlying purpose of the proposed project. The following are the proposed project objectives:

A. Address safety, functionality, and structural deficiencies of the necessary crossing structure over Hangtown Creek in a manner that meets modern engineering standards for bridge and road design.
B. Improve roadway public safety, traffic operations, and access by first responders.
C. Improve pedestrian and bicyclist access and safety in the project area.
D. Minimize impacts to adjacent properties.
E. Preserve and retain the existing overall historic character.

1.4.3 Project Characteristics

Pursuant to City Council direction to staff at their meeting held on January 27, 2015, the proposed project would replace the existing Clay Street Bridge over Hangtown Creek with a new two-lane bridge with sidewalks and shoulders to current design and safety standards. This new structure would necessitate the realignment of Clay Street to form a new four-way intersection with Main Street and Cedar Ravine Road. The main physical components of the proposed project include the following:

- Bridge length would be approximately 37 feet, with an approximate 40-foot-width to accommodate travel lane, shoulders and sidewalks.
- Accommodate a two-lane roadway with standard sidewalks on both sides of the road for pedestrian connection to the El Dorado Trail as well as to the neighborhoods north on Clay Street.

- The new bridge width would accommodate either shoulders or Class III bicycle facilities.
- Realign Clay Street to form a four-way, stop-controlled intersection consisting of Main Street, Clay Street, and Cedar Ravine Road.
- Reconfigure the Ivy House parking lot into two separate parking lots on each side of the realigned Clay Street.
- Move and preserve the historic Druid Monument to a new and protected location at a raised concrete pedestrian refuge island on Main Street and out of the direct path of vehicular traffic.
- Preserve the cork oak tree in place and modify the stone planter.
- Replace and reconstruct approximately 150 feet of the Cedar Ravine drainage culvert between Main Street and the existing Clay Street Bridge to prevent additional future failures of the structure and potentially, failure of the roadway and the Druid Monument.
- Reconstruction of the El Dorado Trail where it crosses Clay Street.

1.5 Environmental Impacts

The City has previously and continues to engage the public to participate in the environmental review process, including scoping of the environmental document and the review of the original Draft EIR.

Section 15128 of the CEQA Guidelines requires that an EIR, including an REIR, contain a statement briefly indicating the reasons that various, possible, new significant effects of a project were previously determined not to be significant, and were therefore not discussed in detail in the EIR. The contents of this REIR were developed based on a Notice of Preparation/Initial Study (NOP/IS), public and agency input received during the scoping process, and the comments received during the original Draft EIR circulation in 2018. Based on that information, a determination was made that although the original Draft EIR did not need to further analyze agriculture and forestry resources, mineral resources, population and housing, and recreation beyond what was required in the Peremptory Writ of Mandate, there was also a determination made to explore further opportunities to take a more culturally sensitive and conservative approach to the project where feasible. As a result, this REIR contains a comprehensive analysis of those additional efforts and the remaining environmental issues identified in Appendix G of the CEQA Guidelines.

Comments to the NOP/IS are found in **Appendix A** of this document. Comments regarding the original Draft EIR and this REIR will be provided and responded to after the circulation of this REIR. For comments received on the original Draft EIR pertaining to issues or features of the project that are mooted by the REIR, there will not be a response to those comments.

1.5.1 Impacts Previously Determined to Need No Further Analysis

The original Draft EIR previously determined that the proposed project would result in no impact or less than significant impacts to geology and soils, public services, and utilities, and thus these resources would not be further analyzed in this subsequent document. That determination remains unchanged as there is no new substantial evidence supporting a different conclusion for those topics. Additionally, as discussed in **Appendix A** (NOP/IS) and the original Draft EIR, the proposed project was determined to have a **no impact** or **less than significant impact** with regard to the following resources subcategorized and summarized below:

AGRICULTURE AND FOREST RESOURCES

- 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 nonagricultural use. – *Project is in an urbanized area, and therefore would not affect farmland.*
- Conflict with existing zoning for agricultural use, or Williamson Act contract. – *Project is in an urbanized area, and therefore would not conflict with agricultural zoning or a Williamson Act contract.*
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), or timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Productions (as defined in Government Code Section 51104(g)). – *Project is in an urbanized area, and therefore would not affect forest or timberland.*
- Result in the loss of forest land or conversion of forest land to non-forest land. – *Project is in an urbanized area, and therefore would not affect forest land.*
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to nonagricultural use or conversion of forest land to nonforest use. – *Project is in an urbanized area, and therefore would not convert farmland or forest land.*

MINERAL RESOURCES

- 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. – *Project exists in a previously disturbed area, and therefore would not affect known, valuable mineral resources.*
- 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. – *Project area is not a locally important mineral resource recovery site.*

POPULATION AND HOUSING

- Induce substantial population growth in an area, either directly (e.g., by proposed new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure). – *Project vicinity contains previously constructed planned developments with limited nearby vacant land containing applicable zoning, and therefore this project would not induce substantial population growth in the area.*

- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. –*Project does not displace any housing; therefore there would be no displacement impact.*
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. – *Project does not displace any residences; therefore there would be no displacement impact.*

PUBLIC SERVICES

- 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 following public services:
    - Fire Protection
    - Police Protection
    - Schools
    - Parks
    - Other Public Services
- *The construction of the proposed project would improve roadway public safety, traffic operations, and access by first responders upon completion of the bridge replacement, and would not require new government facilities for any of the above public services; therefore no further impact evaluation is required.*

RECREATION

- 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. - *Multiple parks and recreational facilities are currently available and will remain available and accessible through temporary detours during and after construction of the project. The project would not increase the population using existing recreational facilities; therefore there is no impact on recreational facilities.*
- Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. – *Existing recreational facilities will remain open and available in the same capacity before, during, and after construction, and the project would not increase the population requiring recreational facilities; therefore there is no impact relating to recreational facilities.*

UTILITIES AND SERVICE SYSTEMS

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. – *Sufficient service will be provided before, during, and after construction of the proposed project, therefore no further impact evaluation is required.*

- 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. – *Sufficient wastewater treatment service will be provided before, during, and after construction of the proposed project, therefore no further impact evaluation is required.*
- 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. – *Existing and sufficient storm drain facilities are present before, during and after construction, therefore no further impact evaluation is required.*
- Have sufficient water supplies available to serve the project from existing entitlements and resources or are new or expanded entitlements needed. – *Sufficient water supplies and service will be provided before, during, and after construction of the proposed project, therefore no further impact evaluation is required.*
- Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments. – *Sufficient wastewater treatment service will be provided before, during, and after construction of the proposed project, therefore no further impact evaluation is required.*
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. – *Sufficient landfill space is available before, during, and after construction of the proposed project, therefore no further impact evaluation is required.*
- Comply with federal, state and local statutes and regulations related to solid waste. – *Sufficient solid waste service will be provided before, during, and after construction of the proposed project, therefore no further impact evaluation is required.*

1.5.2 Impacts of the Proposed Project

Potential environmental effects of the proposed project are analyzed, and mitigation measures are discussed in detail in **Chapter 4** of this REIR. **Table 1.9-1**, found at the end of this Executive Summary, provides a summary of the environmental effects of the proposed project, required mitigation measures, and level of significance.

1.6 Alternatives to the Proposed Project

Section 15126.6 of the CEQA Guidelines states that an EIR must address "a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the proposed project and evaluate the comparative merits of the alternatives." Based on the potential significant and unavoidable impacts on cultural resources and transportation and traffic (cumulative), along with the proposed project objectives,

several alternatives were developed and considered. A full discussion of the alternatives is provided in **Chapter 6, Alternatives**.

1.6.1 Alternatives Analyzed for this REIR

Pursuant to CEQA Guidelines Section 15126.6(c), a total of four project alternatives were developed, considered, and analyzed for this REIR. Alternatives that would avoid or substantially lessen any of the significant and unavoidable effects of the proposed project and that would feasibly attain most of the basic project objectives are summarized below. A more detailed discussion is provided in **Section 6.4, Project Alternatives**.

ALTERNATIVE 1 – NO PROJECT/NO BUILD ALTERNATIVE

Under the No Project Alternative (Alternative 1) the proposed project would not be constructed. The project site would remain unaltered in its current condition. Under Alternative1, the Clay Street Bridge would not be replaced, and degradation of the bridge would continue until structure failure. The intersections at Main Street, Cedar Ravine Road, and Clay Street would remain the same as existing conditions. Because of its integral construction into the southern abutment of the Clay Street Bridge, most of the Cedar Ravine culvert would remain untouched. The Druid Monument would remain in its existing location with its current exposure to traffic movements and potential culvert collapse. This alternative would not include any improvements to the project area other than routine maintenance of existing facilities based on available local funding.

This alternative would avoid significant impacts to cultural resources and would avoid most of the impacts associated with the proposed project. However, Air Quality and GHG emissions will continue to increase, becoming more severe than they would with the proposed project due to increased idling time. The Clay Street Bridge would continue to deteriorate with sub-standard facilities for bicycles and pedestrians to access the El Dorado Trail and adjacent neighboring destinations. The consequences of this deterioration could result in a greater impact to life safety and transportation and traffic than the proposed project. Emergency response would continue to be affected by the challenges associated with the physical constraints of a one-lane bridge. In addition, the Druid Monument remaining in its current alignment would result in continued unsafe turning movements for larger vehicles and would remain at risk for further damage or destruction should the Cedar Ravine culvert fail. This alternative would achieve two of the five project objectives (Objectives D & E); however, Alternative 1 would not achieve any of the objectives related to safety.

ALTERNATIVE 2 – CLAY STREET BRIDGE REPLACEMENT ONLY/NO CLAY STREET REALIGNMENT

Under Alternative 2, the Clay Street Bridge Replacement Only/No Clay Street Realignment with Cedar Ravine Road Alternative, the existing Clay Street Bridge and convergence of the Cedar Ravine culvert at the southern abutment would be

demolished, and a new two-lane bridge would be constructed along its existing alignment. For a two-lane bridge, applicable engineering standards (American Association of State Highway and Transportation Officials [AASHTO]) would require minimum 11-foot lanes in each travel direction, plus a minimal shoulder, and curbs, gutters, and sidewalks. Meeting these requirements, the minimum width of the roadway would be 28 feet between curbs (11-foot lanes and 3-foot shoulders) and a 6-foot sidewalk on each side, for a total minimum overall bridge width of 44 feet, which is slightly wider than the proposed alternative. To accommodate the new bridge along the existing Clay Street alignment, the sidewalk on the northeast side of the roadway would encroach into the State right-of-way and the fill slope of eastbound US-50 and the back of sidewalk on the west side of Clay Street would encroach onto the private property (i.e., 589 Main Street), requiring the City to acquire permanent right-of-way. Clay Street would not be realigned to create the four-way intersection with Main Street and Cedar Ravine Road, and the Ivy House parking lot would not be reconfigured to accommodate the realignment. The Druid Monument would remain at its current location and continue to be at risk to vehicular traffic movements.

Similar to the recommended alternative, this alternative would continue to have a significant impact to a cultural resource (Clay Street Bridge) but would avoid significant impacts to the other cultural resource (the Druid Monument), albeit it would remain unprotected and within the existing intersection. This alternative would reduce some of the remaining impacts associated with the proposed project because no other roadway improvements would occur beyond the replacement of the bridge and conforming the new bridge back to existing conditions along Clay Street. However, this alternative would have more severe impacts to adjacent parcels, land use, and planning when compared to the proposed project due to the need for property acquisition along the west side of Clay Street (i.e., 589 Main Street).

In addition, because Clay Street would remain in its existing alignment, this alternative would result in more severe impacts to air quality, greenhouse gas emissions, transportation and traffic than the proposed project. This alternative would achieve only some of the project objectives (Objectives A & C); however, Alternative 2 would partially achieve objectives related to safety (Objective B). But overall, this alternative provides additional and more severe impacts compared to the proposed project and realignment.

ALTERNATIVE 3 – CLAY STREET BRIDGE REPLACEMENT WITH ROUNDABOUT

This Alternative includes the replacement of the existing Clay Street Bridge over Hangtown Creek, the realignment of Clay Street, and the reconfiguration of the Clay Street/Cedar Ravine/Main Street intersection with the construction of a roundabout. This alternative represents the preferred alternative that was previously considered in the previous Mitigated Negative Declaration (MND) that was successfully challenged in El Dorado Superior Court. In 2014, Measure K was passed by the voters of Placerville, requiring voter approval for the implementation of roundabouts. Although there are

more than 20 roundabouts programmed for funding in surrounding areas, including the recently constructed roundabout at Camino Heights approximately 5.8 miles away in Camino, California, the Measure K requirement for voter approval of a roundabout within city limits, though not impossible, does place this alternative with a procedurally challenging to implement.

Alternative 3 would continue to have a significant impact to one cultural resource (Clay Street Bridge) but would avoid significant impacts to the other cultural resource (the Druid Monument). Given that roundabouts are proven to have safety and operational advantages over conventional four-way intersections, it is further determined that a roundabout at the intersection would reduce significant levels of project impacts relating to safety, transportation, and traffic impacts at the Main Street/Clay Street/Cedar Ravine Road intersection. This alternative would maintain or reduce most of the remaining impacts associated with the proposed project. This alternative would achieve all of the project objectives. Although this alternative is documented as the more culturally sensitive alternative and achieves all of the project's objectives, it was strongly opposed by some members of the public previously and was a large part of the motivation for the legal challenge to the project's MND.

1.6.2 Alternatives Considered but Eliminated from Further Analysis

Pursuant to CEQA Guidelines Section 15126.6(c), four alternatives were considered but eliminated from further evaluation. These alternatives are discussed in detail in **Section 6.5, Alternatives Considered by Eliminated from Further Analysis**. These alternatives include:

- Construct New Clay Street Bridge Parallel to Existing Bridge with Clay Street Realignment
- Clay Street Bridge Rehabilitation
- Clay Street Bridge Rehabilitation and Reclassification
- Closing the Ivy House Parking Lot and Clay Street to Vehicle Traffic

1.7 Areas of Controversy and Focused Evaluation

Section 15123(b)(2) of the CEQA Guidelines states that an EIR must contain "areas of controversy known to the lead agency including issues raised by agencies and the public" which leads to focused evaluation of the items identified through the Peremptory Writ of Mandate (Writ) issued by the El Dorado County Superior Court (**Appendix B)**, written agency comments, and public comments received during the scoping period and public review period for the original Draft EIR. Public comments received during scoping are provided in **Appendix A**; comments regarding the original Draft EIR and this REIR will be provided, and responded to, after the circulation of this REIR. For comments received on the original Draft EIR pertaining to issues or features of the project that are mooted by the REIR, there will not be a response to those comments. In summary, the following issue areas were identified and are addressed in the appropriate sections of **Chapter 4**:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use, Planning, and Consistency with Area Plans and Policies
- Growth-Inducing Impacts
- Noise
- Transportation and Traffic
- Parking
- Urban Decay

1.8 Issues to Be Resolved

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, which includes the choices among alternatives and whether, or how, to mitigate significant impacts. The major issues to be resolved regarding the proposed project include decisions by the lead agency on whether or not:

- The Draft EIR, or in this case the REIR, adequately describes the environmental impacts of the project;
- The recommended mitigation measures should be adopted or modified; or,
- Additional mitigation measures need to be applied.

1.9 Summary of Environmental Impacts and Mitigation

Table 1.9-1, below, is a summary of the environmental impacts of the proposed project, mitigation measures required to reduce impacts, and significance levels before and after mitigation, where appropriate. The full discussions and analyses for the resource areas are provided in **Chapter 4** of this REIR.

TABLE 2.9.1 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

POTENTIAL IMPACT	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE
Aesthetics			
Have a substantial adverse effect on a scenic vista?	Less than Significant	None required	Less than Significant
Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less than Significant	None required	Less than Significant
Substantially degrade the existing visual character or quality of the site and its surroundings?	Potentially Significant	**Mitigation Measure AES-1**: The project shall incorporate the following streetscape and landscape design concepts: • Low planter walls shall be placed along the Main Street and Clay Street edges of the reconfigured Ivy House parking lot in the same style as other surrounding rock wall features and to offer informal and temporary seating opportunities. • Tree species as identified in Appendix A of the Main Street Streetscape Design Development Plan (incense cedar, tulip tree, valley oak, red oak, and Chinese pistache) shall be planted along Main Street in areas where ample room is supplied to define public space along the street and adjacent to parking lots to provide shade. • Accent planting in large planting beds shall be provided adjacent to the reconfigured Ivy House parking lot. • New streetlights installed as part of the project shall have period-appropriate cast iron light pole standards and must meet applicable energy standards and City lighting specifications for safety of public roadways as set forth in Chapter XII, Section B, of the City's Development Guide. **Mitigation Measure AES-2**: The project shall incorporate the following measures to protect natural features appreciated by the public for their history and character: • The cork oak tree shall be protected in place by establishing a tree protection zone (TPZ) and by implementing requirements for a TPZ set forth in **Mitigation Measure BIO-3** and any other necessary measures, as determined by an ISA-certified arborist, to protect the cork oak during construction. • The redwood tree at the northwest corner of the Clay Street Bridge shall be evaluated by an ISA-certified arborist to determine the tree's health. If it is determined the tree will not pose a hazard and can remain in place, the tree shall be protected in place by establishing a TPZ and by implementing requirements for a TPZ set forth in Mitigation Measure BIO-3 and any other necessary measures, as determined by an ISA-certified arborist, to protect the redwood tree during construction. **Mitigation Measure AES-3**: The project shall incorporate the following measures to address impacts associated with the loss of vegetation and trees: • Vegetation clearing will only occur within the delineated project boundaries and as necessary to construct the project. Trees located in areas along the edge of the construction zone will be trimmed, and only those trees that lie within the active construction areas and cannot be avoided will be removed. Replacement of removed trees within the active construction area will be replaced at a 1:1 ratio unless the natural resource agencies with permitting authority over the project require a higher ratio. Implement **Mitigation Measures CUL-1** through **CUL-3**.	Less than Significant with Mitigation
Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	Less than Significant	None required	Less than Significant

TABLE 2.9.1 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION			
POTENTIAL IMPACT	**LEVEL OF SIGNIFICANCE BEFORE MITIGATION**	**MITIGATION MEASURES**	**LEVEL OF SIGNIFICANCE**
Air Quality			
Conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant	None required	Less than Significant
Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Less than Significant	None required	Less than Significant
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 emissions that exceed quantitative thresholds for ozone precursors)?	Less than Significant	None required	Less than Significant
Expose sensitive receptors to substantial pollutant concentrations?	Less than Significant	None required	Less than Significant
Create objectionable odors affecting a substantial number of people?	Less than Significant	None required	Less than Significant
Biology			

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?	Potentially Significant	**Mitigation Measure BIO-1:** A qualified biologist or botanist shall conduct focused surveys for Sierra arching sedge during the normal blooming or identifying period for these species. The surveys shall be conducted within the construction area and prior to any ground disturbing activities. The results of the survey shall be documented in a concise memorandum. If the survey results are negative, work can proceed without additional measures.
		
		If Sierra arching sedge is identified within the construction area, a qualified biologist shall prepare a salvage and relocation plan to avoid and minimize direct impacts to special-status plants. The plan shall identify the methods of salvage (e.g., seed collection, individual transplants) and the relocation area(s). Salvage efforts shall be conducted in coordination with CDFW and the local CNPS chapter.
		
		Mitigation Measure BIO-2: Migratory Birds and Raptors. The following measures shall be used when work occurs on or in the vicinity of trees or structures that may be subject to nesting by migratory birds:
		
		• To avoid and minimize impacts to tree and shrub nesting species, the following measures shall be implemented:
		  ○ Tree and shrub removal and grading activities shall be conducted during the non-breeding season (generally October 1 through January 31), if the construction schedule allows.
		  ○ If grading and tree removal activities are scheduled to occur during the breeding and nesting season (February 1 through September 30), preconstruction surveys shall be performed prior to the start of project activities.
		• If construction, grading, or other project-related activities are scheduled during the nesting season (February 1 to September 30), preconstruction surveys for other migratory bird species shall take place no less than 14 days and no more than 30 days prior to the beginning of construction within 250 feet of suitable nesting habitat.
			Less than Significant with Mitigation

TABLE 2.9.1 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION			
POTENTIAL IMPACT	**LEVEL OF SIGNIFICANCE BEFORE MITIGATION**	**MITIGATION MEASURES**	**LEVEL OF SIGNIFICANCE**
		○ If the preconstruction surveys do not identify any nesting migratory bird species in areas potentially affected by construction activities, no further avoidance or minimization measures would be required. ○ If the preconstruction surveys do identify nesting bird species in areas that may be affected by site construction, the following measure shall be implemented: ▪ Project-related construction impacts shall be avoided by establishing appropriate no-work buffers to limit project-related construction activities near the nest site. The size of the no-work buffer zone shall be determined in consultation with the CDFW. The no-work buffer zone shall be delineated by highly visible temporary construction fencing. In consultation with the CDFW, monitoring of nest activity by a qualified biologist may be required if the project-related construction activity has the potential to adversely affect the bird's nest or nesting behavior. No project-related construction activity shall commence within the no-work buffer area until a qualified biologist confirms that the nest is no longer active. • The following measures shall be incorporated for bridge-nesting birds if bridge demolition or construction of the new bridge occurs during the nesting season (February 1 through September 30): ○ Exclusionary netting shall be installed around the undersides of the existing bridge before February 1 of the construction year to prevent new nests from being formed and/or prevent the reoccupation of existing nests. Exclusionary netting may also be required during construction of the new bridge if it is completed during the breeding season. The construction contractor would be required to do the following: ▪ Adhere to all state and federal laws and regulations pertaining to the protection of migratory birds, their nests, and young birds. ▪ Remove all existing unoccupied nests on the bridge during the non-nesting season (October 1 through January 31). ▪ Keep the bridge free of nests, using exclusionary netting or other approved methods, until construction activities are completed. ▪ Inspect all listed structures for nesting activity a minimum of three days per week; no two days of inspection shall be consecutive. A weekly log shall be submitted to the project biologist. The contractor shall continue inspections until the existing bridge has been removed and construction on the new bridge is completed. If an exclusion device is found to be ineffective or defective, the contractor shall complete repairs to the device within 24 hours. If birds are found trapped in an exclusion device, the contractor shall immediately remove the birds in accordance with USFWS guidelines. ▪ Submit for approval working drawings or written proposals of any exclusion devices, procedures, or methods to the project biologist before installing them. ▪ The method of installing exclusion devices shall not damage permanent features of the new bridge structure. Approval by the project biologist of the working drawings or inspection performed by the authorized project biologist shall in no way relieve the contractor of full responsibility for deterring nesting. •	

TABLE 2.9.1 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

POTENTIAL IMPACT	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE
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 U.S. Fish and Wildlife Service?	Potentially Significant	**Mitigation Measure BIO-3:** The following shall be implemented to reduce project effects on riparian and montane hardwood-conifer vegetation, oaks, and other native trees: • Prior to removal of any trees, an ISA-certified arborist shall conduct a tree survey in areas that may be impacted by construction activities and that are not already slated for community-wide fire hardening. This survey shall document tree resources that may be adversely impacted by project implementation. The survey will follow standard professional practices. • Current riparian vegetation, oaks, and other native tree species will be retained to the extent feasible. A tree protection zone (TPZ) shall be established around any tree or group of trees to be retained. The TPZ will be delineated by an ISA-certified arborist. The TPZ shall be defined by the radius of the dripline of the tree(s) plus 1 foot. The TPZ of any protected trees shall be demarcated using fencing that will remain in place for the duration of construction activities. • Construction-related activities shall be limited within the TPZ to those activities that can be completed by hand. No heavy equipment or machinery shall be operated within the TPZ. Grading shall be prohibited within the TPZ. No construction materials, equipment, or heavy machinery shall be stored within the TPZ. • Protective fencing shall be installed along the edge of construction areas including temporary and permanent access roads where construction will occur (as determined by a qualified biologist). The location of fencing shall be marked in the field with stakes and flagging and shown on the construction drawings. The construction specifications shall contain clear language that prohibits construction-related activities, vehicle operation, material and equipment storage, trenching, grading, or other surface-disturbing activities outside of the designated construction area. Signs shall be erected along the protective fencing at a maximum spacing of one sign per 50 feet of fencing. The signs shall state: “This area is environmentally sensitive; no construction or other operations may occur beyond this fencing. Violators may be subject to prosecution, fines, and imprisonment.” The signs shall be clearly readable at a distance of 20 feet and shall be maintained for the duration of construction activities in the area. • Where riparian vegetation occurs along the edge of the construction easement, the City shall minimize the potential for long-term loss of riparian vegetation by trimming vegetation rather than removing the entire plant. Trimming will be conducted per the direction of a biologist and/or certified arborist. • To compensate for the permanent removal of riparian vegetation associated with the bridge construction, the City shall compensate for riparian tree and shrub removal by replacing habitat at a minimum 3:1 ratio (e.g., 3 acres planted for every one acre removed) as well as associated native herbaceous species, subject to regulatory permit conditions. Preservation and restoration may occur onsite or within the watershed through a conservation agreement or offsite through purchasing mitigation bank credits. • Any onsite mitigation shall include planting of valley foothill/floodplain/mixed riparian species as appropriate. A planting plan will be implemented as detailed in a Restoration Plan approved by the CDFW. The Restoration Plan will include performance standards for revegetation that will ensure successful restoration of the onsite riparian areas.	Less than Significant with Mitigation

TABLE 2.9.1 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

POTENTIAL IMPACT	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE
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 wetlands, etc.), through direct removal, filling, hydrological interruption, or other means?	Potentially Significant	Implement **Mitigation Measure BIO-3**.	Less than Significant with Mitigation
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?	Potentially Significant	Implement **Mitigation Measure BIO-2**.	Less than Significant with Mitigation
Substantially 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, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species?	Potentially Significant	Implement **Mitigation Measure BIO-1** and **BIO-3**.	Less than Significant with Mitigation
Cultural Resources			
Cause a substantial adverse change in the significance of a historical resource pursuant to Section15064.5?	Potentially Significant	**Mitigation Measure CUL-1:** The following measures are recommended to minimize harm and adverse effects to the Clay Street Bridge from the proposed project: • Prior to removal of the Clay Street Bridge, the bridge shall be formally documented by a professionally qualified architectural historian in the format of a Historic American Engineering Record (HAER) recordation following National Park Service guidelines. The documentation shall meet the "Level II" requirement for content, consisting of measured drawings, large format photographs, and written data that record the significance of the Clay Street Bridge. • Measured Drawings. Selected existing drawings (including plans, elevations, and selected details), if available, shall be reproduced photographically in accordance with HAER photographic specifications. If existing drawings are not available, detailed drawings (e.g., plans, elevations, and selected details) shall be completed. • Photographs. Photographs must be large format (4" x 5" negative size) showing the bridge in context as well as details of its engineering features. The photographs shall be produced and processed for archival permanence in accordance with the HAER photographic specifications. Views shall include contextual views, elevation views, and details of the significant design and engineering elements. • Written Data. The descriptive and historical information contained in the Historical Resources Evaluation Report shall be sufficient to meet the HAER written data requirement. • The City shall ensure one archival copy of the HAER documentation with photographs is submitted to the El Dorado County Historical Society. • The City shall ensure one digital copy of the HAER documentation is submitted to the North Central Information Center, the Friends of Historic Hangtown, and other parties as determined by the City or upon request by others. **Mitigation Measure CUL-2:** The following measures are recommended to minimize harm and adverse effects to the Druid Monument from the proposed project.	Significant and Unavoidable

TABLE 2.9.1 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

POTENTIAL IMPACT	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE
		• Historic American Building Survey Documentation. Prior to removal and dismantling of the Druid Monument, the monument shall be formally documented by a professionally qualified architectural historian in the format of a Historic American Buildings Survey (HABS) recordation following National Park Service guidelines. The documentation shall meet the "Level II" requirement for content, consisting of measured drawings, large format photographs, and written data that document the significance of the Druid Monument. • Measured Drawings. Selected existing drawings (including plans, elevations, and selected details), if available, shall be reproduced photographically in accordance with HABS photographic specifications. If existing drawings are not available, detailed drawings (e.g., plans, elevations, and selected details) shall be completed. • Photographs. Photographs must be large format (4" x 5" negative size) showing the Druid Monument in context as well as details of its engineering features. The photographs shall be produced and processed for archival permanence in accordance with the HABS photographic specifications. Views shall include contextual views, elevation views, and details of the significant design elements. • Written Data. The descriptive and historical information contained in the Historical Resources Evaluation Report shall be sufficient to meet the HABS written data requirement. • The City shall ensure one archival copy of the HABS documentation with photographs is submitted to the El Dorado County Historical Society • The City shall ensure one digital copy of the HABS documentation is submitted to the North Central Information Center, the United Ancient Order of the Druids, the Friends of Historic Hangtown, and other parties as determined by the City or upon request by others. • Relocation. Following the completion of the HABS documentation, an individual qualified in the reconstruction/relocation of historic properties similar to the Druid Monument (for example, an architect who specializes in historic preservation), and approved by the City, shall design the plan for the removal, dismantling, storage, movement, and reinstallation of the Druid Monument. The plan shall provide for investigating the Cedar Ravine culvert underlying the monument's foundation to ensure its stability prior to dismantling and removing the monument. If the structural stability of the culvert may pose a risk to the monument's removal and dismantling, the plan shall identify the procedures for temporarily stabilizing the culvert until removal and dismantling is completed. This same individual shall be responsible for directing and overseeing the dismantling and reinstallation of the monument. The dedication plaque shall be retained, with additional text documenting the movement of the resource. If this addition cannot be made to the existing plaque, a new plaque of like construction will be placed at the monument. • The City shall invite the United Ancient Order of the Druids, Grand Grove (UAOD) to be present during the relocation of the monument. • The City shall invite the United Ancient Order of the Druids, Grand Grove (the Druids) the opportunity to rededicate the monument in its new location. • The City shall provide electricity to the monument's torch, so that it can be lit in the evenings and continue to function as it was originally intended.	

TABLE 2.9.1 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

POTENTIAL IMPACT	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE
		• Decorative and traffic rated bollards consistent with design guidelines in the Main Street Streetscape Design Development Plan shall be installed to protect the monument from vehicle traffic. • The City shall regularly check the monument for signs of vandalism, graffiti, or litter. • A freestanding interpretive/educational sign shall be erected next to the monument to highlight the monument's original location, why it was moved, its importance to the Druid organization, and its National Register of Historic Places status. The City shall invite the Druids to assist with the creation of the text for the sign during the Plans, Specifications and Estimates (PS&E) phase of the proposed project. • An individual who meets Secretary of the Interior Standards as an historian and/or architectural historian shall expand upon and revise the existing write-up on the Druid Monument that is included in the public educational information and tourism, including any self-guided walking tours of Main Street Placerville. The City shall provide interested parties, including the Druids, with an opportunity to review the text prior to it being published. • The City will engage the services of a monument specialist during the design phase, with experience with large, historically valuable monuments, to oversee the removal, storage, and relocation of the monument to ensure no damage will occur during the relocation of the Druid Monument. **Mitigation Measure CUL-3:** The following measure will be used to minimize vibrational impacts to historic buildings in the Placerville Main Street District during construction of the proposed project: The City shall ensure vibration monitoring is performed during project construction at the existing Clay Street/Main Street intersection to ensure the vibration levels previously recorded by Gasch (2018) are not exceeded such that the project would result in damage to the following buildings: J. Pearson Placerville Soda Works Building (594 Main Street); 582 Main Street (the Stable Building); 585 Main Street; and 589 Main Street. Construction contracts shall include all required conditions. If the results indicate vibration levels are exceeded, the City shall stop work and implement alternative construction methods recommended by the California Department of Transportation (Caltrans) in its 2013 Transportation and Construction Vibration Guidance Manual to protect the resources. Selected methods shall demonstrate the Caltrans-identified risk of structural damage to historical buildings of 0.1 inches per second peak particle velocity (PPV), or other protective threshold as identified in the analysis, would not be exceeded.	
Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section15064.5?	Potentially Significant	**Mitigation Measure CUL-4**: The City shall implement the following measures during project construction: • A preconstruction meeting shall be conducted by a professional archaeologist meeting the qualifications outlined in the Secretary of the Interior's Professional Qualification Standards for archaeology to educate construction contractors about the potential for encountering archaeological resources and next steps if a resource is discovered. • Archaeological monitoring in the Ivy House parking lot shall be completed by a professional archaeologist meeting the qualifications outlined in the Secretary of the Interior's Professional Qualification Standards for archaeology. • Archaeological and/or tribal monitoring will be on site during construction activities that disturb native soil within the vicinity of the BRM in Hangtown Creek. Up to two months prior, and no less than one week prior, to the start of construction activities of native soil, the City will contract with a qualified Archaeological Consultant and/or Tribal Monitor. Monitors will wear the appropriate safety equipment while on the construction site and will document field-	Less than Significant with Mitigation

TABLE 2.9.1 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION			
POTENTIAL IMPACT	**LEVEL OF SIGNIFICANCE BEFORE MITIGATION**	**MITIGATION MEASURES**	**LEVEL OF SIGNIFICANCE**
		monitoring activities on a monitoring log. The qualified archaeological monitor will be given one business day notice of the start of native soil disturbing activities. • If prehistoric or historic-period archaeological deposits are discovered during project construction activities at the Ivy House parking lot, or at any location within the project site, all work within 25 feet of the discovery shall be redirected and the archaeologist shall assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Impacts to archaeological deposits should be avoided by project activities, but if such impacts cannot be avoided, the deposits shall be evaluated for their California Register of Historical Resources (CRHR) eligibility. If the deposits are not CRHR–eligible, no further protection of the finds is necessary. If the deposits are CRHR–eligible, they shall be protected from project-related impacts or such impacts mitigated. Mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility. Public educational outreach may also be appropriate. • The City shall also ensure compliance with any additional measures that are included in the Cultural Resources Management Plan (CRMP) that is being finalized through the NEPA process for the project as it pertains to the Ivy House archaeological deposits and other locations that may be disturbed by project construction. **Mitigation Measure CUL-5:** For the BRM, an Environmentally Sensitive Area (ESA) will be established in consultation with the City, a Tribal Monitor, and the qualified archaeologist consultant along the north bank of Hangtown Creek and delineated on the engineering plans. The fencing will consist of three-foot-high, orange, polyethylene, construction fencing and will extend the full distance of this portion of the BRM plus a 10-foot buffer to ensure the site is not disturbed. This fencing will serve as a clear visual barrier for construction personnel beyond which no project-related activities can occur. No less than one week prior to the start of construction, the Resident Engineer will contact the City's qualified Archaeological Consultant to assist in the installation of the ESA fencing. The qualified Archaeological Consultant will be given one business day notice of the start of ESA fencing installation. Protective measures include fencing, access restrictions, and specific contractual language. The following actions will be undertaken prior to construction: • The qualified Archeological Consultant and Certified Tribal Monitor will work closely with the Resident Engineer (RE) and Construction Contractor to educate all involved about potential sensitive precontact resources. A preconstruction field review will be conducted by the archaeological consultant, as well as training for construction personnel; • The ESA Map will be included in the City's RE's Pending File and clearly marked on all project plans and contract specifications (PS&E) documents; and • The ESA fencing will remain in place until the construction activities are complete. In addition to the measures outlined above, construction specifications and engineering plans will include the location of the ESA fencing and the following language: • Contractor is responsible for protection of the BRM;	

TABLE 2.9.1 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION			
POTENTIAL IMPACT	**LEVEL OF SIGNIFICANCE BEFORE MITIGATION**	**MITIGATION MEASURES**	**LEVEL OF SIGNIFICANCE**
		• Contractor will advise all construction workers of the location of the BRM and they are required to protect the BRM from an inadvertent damage; • Prior to construction activities, the City's Archaeological Consultant and Tribal will delineate the ESA for the contractor installation of a three-foot-high orange temporary construction fence with 10-foot buffer around the site; and No construction personnel or ride-on machinery will be allowed within the ESA boundary	
Disturb any human remains, including those interred outside of formal cemeteries?	Potentially Significant	**Mitigation Measure CUL-6:** If human remains are encountered during project activities, the California Health and Safety Code (HSC) requires that excavation be halted in the immediate area and the local county coroner is to be notified to determine the nature of the remains. It is very important that the suspected remains, and the area around them, are undisturbed and the proper authorities called to the scene as soon as possible, as it could be a crime scene. The Coroner will determine if the remains are archaeological/historic or of modern origin and if there are any criminal or jurisdictional questions. The coroner is required to examine all discoveries of human remains within 24 hours of receiving notice of a discovery (HSC 7050.5[b]). If the coroner determines that the remains are Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (HSC 7050.5[c]). The responsibilities of the NAHC for acting upon notification of a discovery of Native American human remains are identified within the California Public Resources Code (PRC 5097.9). The NAHC is responsible for immediately notifying the person it believes is the Most Likely Descendant (MLD) of the Native American remains. With permission of the legal landowner(s), the MLD may visit the site and make recommendations regarding the treatment and disposition of the human remains and any associated grave goods. This is to be conducted within 24 hours of their notification by the NAHC (PRC 5097.98[a]). If an agreement for treatment of the remains cannot be resolved satisfactorily, any of the parties may request mediation by the NAHC (PRC 5097.94[k]). Should mediation fail, the landowner or the landowner's representative must reinter the remains and associated items with appropriate dignity on the property in a location not subject to further subsurface disturbance (PRC 5097.98[b]).	Less than Significant with Mitigation
Greenhouse Gas Emissions			
Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than Significant	None required	Less than Significant
Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant	None required	Less than Significant
Hazards and Hazardous Materials			
Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant	None required	Less than Significant

TABLE 2.9.1 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

POTENTIAL IMPACT	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE
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?	Potentially Significant	**Mitigation Measure HAZ-1:** Prior to any ground disturbance, the City of Placerville shall investigate and test soil and groundwater under the Ivy House parking lot, Main Street fronting the parking lot, and the Clay Street alignment extending north to the bridge for the presence of soil and groundwater contamination. Surface water and sediment sampling in Hangtown Creek shall also be performed to determine whether contaminants have migrated to locations that would be affected by bridge construction. A work plan describing the investigation shall be prepared by a qualified professional and submitted to Caltrans and the El Dorado County Environmental Management Division for review and approval. The work plan shall be implemented prior to any construction activity in the potentially affected area. If the results of the investigation indicate contamination, the level of contamination shall be evaluated by a qualified professional to determine whether the levels would pose an unacceptable health risk to construction workers, who would be the most susceptible to inhalation and soil/groundwater contact hazards, or if activities involving sediment that would be disturbed by the bridge replacement could be mobilized and pose a risk to surface water in Hangtown Creek. The City shall provide the study report to Caltrans and the El Dorado County Environmental Management Division, and shall notify the Central Valley RWQCB and/or DTSC, if reporting is required. No work shall be allowed to proceed at any location in the investigation study area until hazardous materials contamination has been remediated to levels that are protective of human health and the environment. **Mitigation Measure HAZ-2**: Prior to bridge demolition and placement removal, the City of Placerville shall retain a qualified professional to test for lead-based paint (LBP), aerially deposited lead (ADL) and asbestos containing materials (ACM) and provide recommendations based on the levels detected, as follows. • Prior to the construction phase of the project a California licensed abatement contractor will conduct a survey for hazardous levels of soil lead at the project site. Representative samples of exposed shallow soils shall be collected at multiple locations along the project site and analyzed for total lead and soluble lead. Sampling of ADL should be performed in accordance with the requirements of DTSC. • If LBP and ACM are present at levels requiring abatement and special disposal, the City shall ensure the work is performed in accordance with applicable regulations to protect the environment and public health, which may include disposal at a landfill facility rated for acceptance of hazardous materials, dust abatement measures during the removal of the contamination, or other special handling, as required based on contamination levels. A report documenting the results and abatement and disposal activities shall be submitted to Caltrans, the El Dorado County Environmental Management Division, and the City Engineering Department to document compliance with regulatory requirements.	Less than Significant with Mitigation
Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Potentially Significant	Implement **Mitigation Measure HAZ-1** and **HAZ-2**.	Less than Significant with Mitigation
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?	Less than Significant	None required	Less than Significant

TABLE 2.9.1 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION			
POTENTIAL IMPACT	**LEVEL OF SIGNIFICANCE BEFORE MITIGATION**	**MITIGATION MEASURES**	**LEVEL OF SIGNIFICANCE**
Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Potentially Significant	Implement **Mitigation Measure TRAF-1**.	Less than Significant with Mitigation
Hydrology and Water Quality			
Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than Significant	None required	Less than Significant
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 onsite or offsite?	Less than Significant	None required	Less than Significant
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 site or off site?	Less than Significant	None required	Less than Significant
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?	Less than Significant	None required	Less than Significant
Otherwise substantially degrade water quality?	Less than Significant	None required	Less than Significant
Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	Less than Significant	None required	Less than Significant
Land Use and Planning			
Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than Significant	None required	Less than Significant
Trigger, directly or indirectly, parcel deterioration and consequent long-term vacancies that ultimately result in urban decay?	Less than Significant	None required	Less than Significant
Noise and Vibration			
Exposure of persons to, or generate, noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?	Potentially Significant	**Mitigation Measure NOI-1:** Most activities generating construction noise within the proposed project area will comply with the City's accepted standard and will be limited to the hours between 7 AM and 7 PM, Monday Through Friday, and 8 AM and 5 PM on Saturday. If nighttime noise level from the Contractor's operations are required between the hours of 9:00 PM and 6 AM, the proposed project will conform to the California Department of Transportation (Caltrans) Standard Specifications, Section 14-8.02, "Noise Control." Nighttime construction noise will not exceed 86 A-weighted decibels (dBA) 1-hour A-weighted equivalent continuous sound level (Leq(h)) at a distance of 50 feet. In addition, the Contractor would equip all internal combustion engines with a	Less than Significant with Mitigation

TABLE 2.9.1 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

POTENTIAL IMPACT	LEVEL OF SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE
		manufacturer-recommended muffler and would not operate any internal combustion engine on the job site without the appropriate muffler	
Exposure of persons to, or generate, excessive ground borne vibration or ground borne noise levels?	Potentially Significant	**Mitigation Measure NOI-2**: All rollers operated within 25 feet of older residential and historic buildings during construction activities will be run in static mode (without vibration). If vibratory equipment is required, the construction contractor is required to provide data that the required equipment is below the Caltrans vibration limit of 0.2 inches/second PPV.	Less than Significant with Mitigation
A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Less than Significant	None required	Less than Significant
A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant	**Mitigation Measure NOI-3**: The project plans and specifications shall include the following requirements for construction activities, throughout all stages of construction, and be monitored/enforced by the City of Placerville Engineering Department: • Construction contracts must specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other State-required noise attenuation devices. • A sign, legible at a distance of 50 feet, shall be posted at the project construction site providing contact information for the City Engineering Department and a telephone number where residents can inquire about the construction process and register complaints. This sign shall indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator will be identified to address construction noise concerns received. The coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the disturbance coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (starting too early, malfunctioning muffler, etc.) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the City. All signs posted at the construction site shall include the contact name and the telephone number for the noise disturbance coordinator. • Identification of construction noise reduction methods. These reduction methods may include shutting off idling equipment after 5 minutes, installing temporary acoustic barriers around stationary construction noise sources, maximizing the distance between construction equipment staging areas and occupied residential areas, and using electric air compressors and similar power tools. • During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers (e.g. away from residences along Cedar Ravine Road).	Less than Significant
Transportation and Traffic			
Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant	None required	Less than Significant
Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Less than Significant	None required	Less than Significant
Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Potentially Significant	**Mitigation Measure TRAF-1**: The City shall prepare and implement a Construction Traffic Management Plan prior to and throughout all stages of construction. The City of Placerville Engineering Department shall monitor and enforce the implementation of the Construction Traffic Management Plan. All construction activities shall be coordinated with the El Dorado County Fire Protection District and the City of Placerville Police Department to ensure that emergency detour access would be maintained to the neighborhoods north of the bridge. The City shall also notify El Dorado Transit of activities that could affect transit routes during construction. The City shall provide advance	Less than Significant with Mitigation

TABLE 2.9.1 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION			
POTENTIAL IMPACT	**LEVEL OF SIGNIFICANCE BEFORE MITIGATION**	**MITIGATION MEASURES**	**LEVEL OF SIGNIFICANCE**
		notification to residents and businesses that could be affected by the roadway improvements and ensure access to all residences and businesses that could be temporarily affected by construction activities will be provided at all times. • Parking: To minimize and reduce parking impact, project team members will conduct meetings with owners of affected businesses during the final project design phase and assess the parking needs. Parking spaces including on-street parking, public parking lots, or private parking areas, would be accommodated where feasible. • Detour/Road Closures: Detour signage will be installed near construction zone to effectively redirect traffic. Potential adverse impacts to circulation and access will be avoided by maintaining as many open lanes as possible along Main Street and Cedar Ravine Road in both directions during construction. • Media Campaign: A Media Campaign will be organized to release information regarding road closure, detour routes, construction location, construction schedule, and other information related to transportation.	
Result in inadequate emergency access?	Potentially Significant	Implement **Mitigation Measure TRAF-1.**	Less than Significant with Mitigation

2. Introduction

The City of Placerville (City), as lead agency, has determined that based upon preliminary analysis in an Initial Study, and the public response to the Clay Street Hangtown Creek Bridge Replacement Project Draft Environmental Impact Report (original Draft EIR), a Recirculated Environmental Impact Report (REIR) is the appropriate environmental analysis document pursuant to the California Environmental Quality Act (CEQA) for the Clay Street Bridge Replacement Project (proposed project).

The REIR also satisfies the requirements of a Peremptory Writ of Mandate (Writ) issued by the El Dorado County Superior Court in February 2012 for the Mitigated Negative Declaration (MND) for the Clay Street/Cedar Ravine Realignment and Clay Street Bridge at Hangtown Creek Replacement Project (El Dorado County Superior Court 2012). The court determined that the previous MND did not consider fair arguments that could be made regarding the following potential impacts:

a) Traffic Impacts;
b) Parking Impacts;
c) Urban Decay Impacts;
d) Biological Resource Impacts;
e) Cultural Resource Impacts;
f) Toxic Impacts [Hazardous Materials];
g) Aesthetics Impacts;
h) Growth-Inducing Impacts; and
i) Inconsistency with Area Plans and Policies.

The court directed the City to rescind project approvals and prepare an EIR addressing items a) through i) **(Appendix B)**.

One project alternative considered in the MND included a roundabout at the Main Street/Clay Street/Cedar Ravine Road intersection in addition to the bridge replacement. Subsequently, due to public opposition, the roundabout was removed as an alternative for the proposed project on July 8, 2014, by City Council resolution. In November 2014, City voters approved Measure K that amended the City's General Plan to prohibit the construction of roundabouts in the city limits unless approved by voters.

On January 27, 2015, City Council directed staff to proceed with the design of the bridge replacement project with the preferred alternative consisting of a four-way stop- or signal-controlled intersection at Main Street/Clay Street/Cedar Ravine Road, including the realignment of Clay Street. Additionally, the El Dorado Trail portion of the project evaluated in the prior MND has been completed as a separate and independent project. All other elements of the originally proposed project are similar to those evaluated in the prior MND as well as the original Draft EIR.

The City proposes to replace the existing Clay Street Bridge that does not meet current design and safety standards, which will also necessitate realignment of Clay Street to

accommodate the new bridge alignment, thus creating a new four-way intersection with Main Street and Cedar Ravine Road as is standard and common throughout Placerville. The proposed project would accommodate a two-lane street with sidewalks on both sides of Clay Street to provide direct pedestrian connection to the El Dorado Trail and neighborhoods to the north of the project from Main Street. The proposed project is described in detail in **Chapter 3, Project Description**.

2.1 Intent of the California Environmental Quality Act

This REIR has been prepared in conformance with CEQA to evaluate the environmental effects of the proposed project. CEQA requires the preparation of an EIR prior to approving any project that may have a significant effect on the environment. For the purposes of CEQA, the term “project” refers to the whole of an action which has the potential for a direct physical change or reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 153789[a]).

The City has prepared this REIR to provide the public, along with responsible and trustee agencies, information about the potential environmental effects of the proposed project. As described in the provisions of CEQA and in Section 15121(a) of the CEQA Guidelines, an EIR is a public informational document that assesses potential environmental effects of the proposed project and identifies mitigation measures and alternatives to the proposed project that could reduce or avoid its adverse environmental impacts. Public agencies are charged with the duty to consider and minimize environmental impacts of a proposed project, where feasible, and are obligated to examine a variety of public objectives including safety, socioeconomic, and environmental factors.

This REIR has been prepared pursuant to the following:

- CEQA (Public Resources Code, Section 21000 et seq.); and
- CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Section 15000 et seq.)

The overall purposes of the CEQA process are to:

- Identify the significant effects to the environment of a project, identify alternatives, and to indicate the manner in which those significant effects can be avoided or mitigated;
- Provide for full disclosure of the project’s environmental effects to the public, the agency decision-makers who will approve or deny the project, and responsible and trustee agencies charged with managing resources (e.g., wildlife, air quality) that may be affected by the project; and
- Provide a forum for public participation in the decision-making process with respect to environmental considerations.

2.2 Purpose of This Environmental Impact Report

An EIR is a public informational document used for planning and decision-making purposes. As stipulated in CEQA Guidelines Section 15088.5, a lead agency is required to recirculate an EIR when significant new information is added after public notice is given of the availability of a Draft EIR for public review, per CEQA Guidelines Section 15087, but before certification. CEQA Guidelines Section 15088.5 states that the term "information" can include changes in the project or environmental setting as well as additional data or other information. This new information is not considered significant unless it would change the EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the proposed project, a feasible way to mitigate or avoid a substantial effect, or a viable alternative.

The City published the original Draft EIR on March 2, 2018 for a 45-day public review period ending April 18, 2018; the City has not taken action to certify the EIR or approve the proposed project. Since circulation of the original Draft EIR in 2018, the City received and heard a multitude of comments regarding the proposed project and decided to take a more conservative approach to protecting the City's historic resources and character and considered improvements to each facet of the proposed project. This refining of design planning resulted in the identification of new technical information, and re-evaluation of feasible alternatives. This approach necessitated updates to several sections of the original Draft EIR to provide consistency and clarity. Therefore, the City has determined that recirculation of the entire DEIR would provide the public with a meaningful opportunity to comment. The City acknowledges the feedback from the public, which has helped to refine this document and the project approach for the betterment and safety of the community.

An EIR, and in this case an REIR, is a public informational document used in the planning and decision-making process. This REIR analyzes the environmental impacts of the proposed project. After the legally mandated public comment period, the City Council will consider the information in the REIR, including the public comments and staff responses to those comments, during the public hearing process. As a legislative action, the final decision on the merits of the proposed project is made by the City Council, which may approve, conditionally approve, or deny the proposed project. The purpose of this REIR is to identify:

- Significant impacts on the environment and the manner in which those significant impacts could feasibly be avoided or mitigated;
- Any unavoidable adverse impacts that cannot be mitigated; and
- Reasonable and feasible alternatives to the project that would attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects of the project.

The REIR also discloses growth-inducing impacts; impacts found not to be significant; and significant cumulative impacts of the proposed project as considered together with past, present, and probable future projects. CEQA requires an EIR, and REIR, be

prepared that reflects the independent judgment of the lead agency. An REIR is circulated to responsible agencies, trustee agencies with resources affected by the project, and interested agencies and individuals, including those that commented on the original Draft EIR. The purposes of public and agency review of this REIR include sharing expertise, disclosing agency analyses and new project information, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counterproposals.

Per CEQA Guidelines Section 15204, reviewers of this REIR are requested to focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of the project record, including factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project.

2.2.1 Issues to Be Resolved

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, which includes the choices among alternatives and whether or how to mitigate significant impacts. The major issues to be resolved regarding the project include decisions by the lead agency on whether or not:

- The Draft EIR, or in this case the REIR, adequately describes the environmental impacts of the project,
- The recommended mitigation measures should be adopted or modified, or
- Additional mitigation measures need to be applied.

2.3 Terminology

To assist reviewers in understanding this REIR, the following terms are defined as follows, based on language found both within CEQA itself and the CEQA Guidelines:

- ***Project or Proposed Project*** means the whole of an action that has the potential for resulting in a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.
- ***Environment*** means the physical conditions that exist in the area and which will be affected by the proposed project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved is where significant direct or indirect impacts would occur as a result of the proposed project. The environment includes both natural and manmade (artificial) conditions.
- ***Impacts*** analyzed under CEQA must be related to a physical change. Impacts are:

  - Direct or primary impacts that would be caused by a proposed project and would occur at the same time and place; or
  - Indirect or secondary impacts that would be caused by a proposed project and would be later in time or farther removed in distance but would still be reasonably foreseeable. Indirect or secondary impacts may include growth-inducing impacts and other effects related to induced changes in the pattern of land use; population density or growth rate; and related effects on air and water and other natural systems, including ecosystems.

- ***Significant impact on the environment*** means a substantial, or potentially substantial, adverse change in any of the physical conditions in the area affected by a proposed project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. An economic or social change by itself is not considered a significant impact on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.
- ***Mitigation*** consists of measures that avoid or substantially reduce a proposed project's significant environmental impacts by:
  - Avoiding the impact altogether by not taking a certain action or parts of an action;
  - Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
  - Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
  - Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or
  - Compensating for the impact by replacing or providing substitute resources or environments.
- ***Cumulative impacts*** are two or more individual impacts that, when considered together, are considerable or that compound or increase other environmental impacts. The following statements also apply when considering cumulative impacts:
  - The individual impacts may be changes resulting from a single project or separate projects.
  - The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over time.
  - A lead agency should first consider whether the combined effect of all of these projects, including the proposed project, is significant. If the answer is yes, then the lead agency should next consider whether the proposed project's

incremental effects are cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

- An EIR may determine that a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project’s contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.

This REIR uses a variety of terms to describe the level of significance of adverse impacts. These terms are defined as follows:

- ***Less than significant.*** An impact that is adverse but that does not exceed the defined thresholds of significance. Less than significant impacts do not require mitigation.
- ***Significant.*** An impact that exceeds the defined thresholds of significance and would, or could, cause a substantial adverse change in the environment. Mitigation measures are recommended to eliminate the impact, reduce it to some degree but not to a less-than-significant level, or reduce it to a less-than-significant level.
- ***Significant and unavoidable***. An impact that exceeds the defined thresholds of significance and cannot be eliminated or reduced to a less-than-significant level through the implementation of feasible mitigation measures.

2.4 Decision-Making Process

CEQA requires lead agencies to solicit and consider input from other interested agencies, citizen groups, and individual members of the public. CEQA also requires a project to be monitored after it has been permitted to ensure that mitigation measures are carried out.

CEQA requires the lead agency to provide the public with a full disclosure of the expected environmental consequences of a proposed project and with an opportunity to provide comments. In accordance with CEQA, the following is the process for public participation in the decision-making process:

- ***Initial Study/Notice of Preparation.*** The City prepared an Initial Study/Notice of Preparation (IS/NOP) and circulated it to responsible agencies, trustee agencies, local agencies, and various organizations and individuals for review and comment on August 11, 2014. The IS/NOP and responses to the IS/NOP are included in **Appendix A** of this EIR. In conjunction with this public notice, a scoping meeting was held by the City on August 27, 2014, to provide a forum for public comments on the scope of the EIR.
- ***Draft EIR Preparation.*** An original Draft EIR was prepared, incorporating public and agency responses to the IS/NOP and scoping process. The original Draft EIR was circulated for review and comment to appropriate agencies and

additional individuals and interest groups who requested to be notified of EIR projects on March 2, 2018. Per Section 15087 of the CEQA Guidelines, the City provided for a 45-day public review period that ended on April 18, 2018.

- ***Recirculated Draft EIR Preparation.*** A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review per CEQA Guidelines Sections 15087 and 15105 but before certification. An REIR is prepared, incorporating public and agency responses to the IS/NOP and scoping process and the original Draft EIR. An REIR is circulated to responsible agencies, trustee agencies with resources affected by the project, interested agencies and individuals, including those that commented on the original Draft EIR, and additional individuals and interest groups who have requested to be notified of EIR projects. Per Sections 15087 and 15105 of the CEQA Guidelines, the City will provide for a 45-day public review period on the REIR. The City will subsequently respond to each significant environmental issues raised in comments on REIR received in writing through a Response to Comments chapter in the Final EIR. For comments received on the original Draft EIR pertaining to issues or features of the project that are mooted by the REIR, there will not be a response to those comments. The Response to Comments will be provided to each agency or person who provided written comments on the REIR a minimum of ten business days before the scheduled City Council hearing on the Final EIR and proposed project.
- ***Preparation and Certification of Final EIR and Action on Proposed Project.*** The City Council will consider the Final EIR (which includes the original Draft EIR, REIR, technical appendices, all public comments and responses) and the project, and will take final action on the project. At least one public hearing will be held by the City Council to consider the Final EIR, take public testimony, and then approve, conditionally approve, or deny the project.

  Under CEQA Guidelines Section 15090, certification of a Final EIR requires a three-part finding. The lead agency's decision-making body shall certify that the Final EIR has been completed in compliance with CEQA, that the Final EIR was presented to the decision-making body of the lead agency, which reviewed and considered the information contained in the Final EIR prior to approving the project, and that the Final EIR reflects the lead agency's independent judgment and analysis.

  In order to approve the proposed project, the City's decisionmakers must also adopt "CEQA Findings" (CEQA Guidelines Section 15091(a)) and a Statement of Overriding Considerations (CEQA Guidelines Section 15093). Within the CEQA Findings, the decision-making body must make one or more of the following findings, accompanied by a brief explanation of the rationale for each

find, with respect to each significant environmental effect identified in the certified Final EIR:

- Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- Such changes or alternations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives in the EIR.

The findings will also explain the City Council's determinations as to the actual feasibility of the alternatives analyzed in the EIR.

Because the proposed project includes significant unavoidable effects, the City's decision-making body must also adopt a statement of overriding considerations (CEQA Guidelines Section 15093) if it determines to approve the proposed project. The function of the Overriding Considerations is to explain the specific reasons why, in the minds of agency decision-makers, the benefits of a proposed project make its unavoidable significant environmental effects acceptable. Typically, a proposed statement of overriding considerations is attached to or part of the findings.

2.5 Availability of the Recirculated EIR

This REIR is being distributed directly to agencies, organizations, and interested groups and persons, including those that commented on the original Draft EIR, for comment during a 45-day formal review period in accordance with CEQA Guidelines Sections 15087 and 15105. This REIR and the documents referenced within the REIR are available for review online or in person during normal business hours Monday through Friday at the City of Placerville Engineering Department at:

3101 Center Street
Placerville, CA 95667
Fax: (530) 295-2510

2.6 Format and Content

This REIR addresses the potential environmental effects of the proposed project and was prepared following input from the public, responsible agencies, trustee agencies, and other affected or interested parties, through the EIR scoping process and the original Draft EIR public review, as discussed previously. The contents of this REIR

were established based on the findings in the IS/NOP, original Draft EIR, and public and agency input. Based on the findings of the IS/NOP and the original Draft EIR, a determination was made that this EIR was required to address potentially significant environmental effects (refer to **Chapter 4** of this REIR) on the following resources:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Transportation and Traffic

2.6.1 Required EIR Content and Organization

The content and organization of this REIR are designed to meet the requirements of CEQA and the CEQA Guidelines, as well as to present issues, analysis, mitigation, and other information in a logical and understandable way. This REIR is organized into the following sections:

- ***Chapter 1, Executive Summary,*** provides a summary of the purpose of the REIR, project description, environmental impacts and mitigation measures, and project alternatives.
- ***Chapter 2, Introduction,*** provides CEQA compliance information, an overview of the decision-making process, organization of the REIR, and a responsible and trustee agency list.
- ***Chapter 3, Project Description,*** provides a description of the location, characteristics, objectives, and the relationship of the proposed project to other plans and policies.
- ***Chapter 4, Environmental Setting, Impacts, and Mitigation Measures,*** contains a detailed environmental analysis of the existing conditions, project impacts, mitigation measures, unavoidable adverse impacts, impact level of significance, and cumulative impacts.
- ***Chapter 5, Consequences of Project Implementation (Mandatory CEQA Sections),*** presents a summary of the proposed project's impacts and provides an analysis of the proposed project's growth-inducing and energy conservation impacts and other CEQA requirements, including significant and unavoidable impacts and irreversible commitment of resources.
- ***Chapter 6, Alternatives,*** describes a reasonable range of potentially feasible alternatives to the proposed project that could reduce at least one significant and unavoidable environmental effect.
- ***Chapter 7, Responses to Comments,*** is reserved for responses to comments on the original Draft EIR and this REIR, which will be provided in the Final EIR.

- ***Chapter 8, Organizations and Persons Consulted,*** lists the organizations and persons contacted during preparation of this REIR.
- ***Chapter 9, Preparers,*** identifies persons involved in the preparation of the REIR.
- ***Chapter 10, References,*** identifies reference sources for the REIR.
- ***Appendices*** provide information and technical studies that support the environmental analysis contained within the REIR.

The analysis of each environmental category in **Chapter 4** is organized as follows:

- ***Introduction*** provides a brief overview on the purpose of the section being analyzed with regard to the proposed project.
- ***Environmental Setting*** describes the physical conditions that exist at this time of the IS/NOP and that may influence or affect the topic being analyzed.
- ***Regulatory Setting*** provides State and federal laws, local laws and policies, and City goals, policies, and implementation measures that apply to the topic being analyzed.
- ***Impacts and Mitigation Measures*** discusses the impacts of the proposed project in each category, including direct, indirect, and cumulative impacts, presents the determination of the level of significance, a discussion of feasible mitigation measures to reduce any impacts, and the resulting level of significance after mitigation is implemented.

2.7 Responsible and Trustee Agencies

Projects or actions undertaken by the lead agency, in this case the City of Placerville Engineering Department, may require subsequent oversight, approvals, or permits from other public agencies in order to be implemented. Other such state agencies are referred to as “responsible agencies” and “trustee agencies.” Pursuant to Sections 15381 and 15386 of the CEQA Guidelines, as amended, responsible agencies and trustee agencies are defined as follows:

- A “responsible agency” is a California public agency that proposes to carry out or approve a project, for which a lead agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term “responsible agency” includes all nonfederal public agencies other than the lead agency that have discretionary approval power over the project (Section 15381).
- A “trustee agency” is a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California (Section 15386).
- Although federal agencies not subject to direction by the California Legislature cannot qualify as either responsible agencies or trustee agencies, federal agencies that are potentially interested in the project are listed below as well.

The various agencies and jurisdictions with a particular interest in the project include, but are not limited to, the following:

2.7.1 Federal Agencies

- U.S. Army Corps of Engineers
- U.S. Environmental Protection Agency, Region 9
- Federal Highway Administration (FHWA)

2.7.2 State Agencies

- California Air Resources Board (CARB)
- California Department of Fish and Wildlife (CDFW), Region 2
- California Department of Transportation (Caltrans District 03)
- California Department of Toxic Substances Control (DTSC)
- California Environmental Protection Agency (Cal EPA)
- California Highway Patrol (CHP)
- California Office of Emergency Services (Cal OES)
- California Public Utilities Commission (CPUC)
- California Regional Water Quality Control Board (RWQCB), Central Valley Region
- Central Valley Flood Protection Board
- Native American Heritage Commission (NAHC)
- State Historic Preservation Officer (SHPO) at the Office of Historic Preservation (OHP)

2.7.3 Local Agencies

- El Dorado County Transit Authority
- El Dorado County Transportation Commission
- El Dorado County Planning Services
- El Dorado County Sheriff Department
- City of Placerville Planning Division
- City of Placerville Police Department
- El Dorado County Fire District
- City of Placerville City Council

2.8 Sources

This REIR is dependent upon information from many sources. Some sources are studies or reports that have been prepared specifically for this document. Other sources provide background information related to one or more issue areas that are discussed in this document. The sources and references used in the preparation of this REIR are listed in **Chapter 10, References**.

In accordance with Section 15150 of the CEQA Guidelines to reduce the size of the report, the following documents are hereby incorporated by reference into this REIR and are available for public review at the City of Placerville Engineering Department. A brief synopsis of the scope and content of these documents is provided below:

2.8.1 City of Placerville General Plan

The proposed project site lies within the boundaries of the City General Plan. The General Plan, including the Housing Element, is a policy document with planned land use maps and related information that are designed to provide long-range guidance to those City officials making decisions affecting the growth and resources of the City's jurisdiction. Adopted on January 23, 1990, and last amended on December 13, 2022, the General Plan helps to ensure that day-to-day decisions conform to the long-range program designed to protect and further the public interest as related to the City's growth and development and mitigate environmental impacts.

2.8.2 City of Placerville Municipal Code

ZONING ORDINANCE

The Zoning Ordinance promotes and protects public health, safety, and welfare through the orderly regulation of land uses throughout the City.

HISTORIC DISTRICT ORDINANCE

The Historic District Ordinance, adopted in 1981, establishes an historical district and provides regulations for the protection, enhancement, and perpetuation of buildings therein. It provides orderly regulation of land uses, preservation, repairs, and removal of buildings within the City's four historic districts. The Ordinance was amended on January 11, 2011 (Ordinance No. 1640).

2.8.3 City Main Street Streetscape Design Development Plan

The Main Street Streetscape Design Development Plan was adopted by City County January 10, 2006. The Plan provides a detailed description of the forms, materials, quantities, configurations, and costs associated with the full realization of the Main Street streetscape vision. The three underpinning objectives of this plan's goal are to preserve and enhance the historical character and assets of Downtown, improve the pedestrian shopping experience and thus bolster Downtown's retail economic viability, and develop a plan that is aesthetically cohesive and economically viable, a plan that can be implemented through a multi-phase and multi-year effort.

2.8.4 City Pedestrian Circulation Plan

April 26, 2005, the City Council adopted a Non-Motorized Transportation Plan (NMTP) within the City limits; it was last updated in 2010. The NMTP plan provides a blueprint for the development of an ultimate bikeway system through the City. It also provides a Pedestrian Element, which includes pedestrian friendly and traffic calming guidance to be utilized to improve the conditions of pedestrians travel in the City.

The development of the Pedestrian Circulation Plan (Ped Plan) became the next step to the NMTP process, and the Ped Plan was adopted in January 2007. The Ped Plan extended the information in the NMTP to provide project priorities and funding options to help guide the City in development a pedestrian network throughout the City.

2.8.5 Hangtown Creek Master Plan (Draft)

The Hangtown Creek Master Plan is the result of a community effort to improve Hangtown Creek water quality through watershed-based management policies. The plan sets forth goals, objectives, policies, and standards addressing enhancement and maintenance of riparian and aquatic habitat; watershed protection, erosion, and flood control; aesthetic history and prehistoric values; and creek access and public spaces, among other topics. The plan remains in draft form and has not been adopted by the City.

2.8.6 El Dorado County General Plan

The El Dorado County General Plan (County General Plan) is a policy document with planned land use maps and related information that are designed to provide long-range guidance to those County officials making decisions affecting the growth and resources of the County's jurisdiction. On July 19, 2004, the County Board of Supervisors adopted a new General Plan; it was last amended on December 10, 2019, the County General Plan helps to ensure that day-to-day decisions conform to the long-range program designed to protect and further the public interest as related to the County's growth and development and mitigate environmental impacts.

3. Project Description

3.1 Proposed Project Overview

This section describes the Clay Street Bridge Replacement Project (proposed project), depicts the location of the proposed project both regionally and locally, describes the existing environmental setting, includes the project objectives, and provides a general description of the proposed project's technical and environmental characteristics. A list of the approvals required to implement the proposed project is also included. Because the City of Placerville (City) would make a number of decisions on this proposed project, all decisions subject to the California Environmental Quality Act (CEQA) are listed in **Section 3.5, Entitlements Required**, and covered by this Recirculated Environmental Impact Report (REIR).

This proposed project is included in the 2019 Federal Statewide Transportation Improvement Program (FSTIP) as well as the Sacramento Area Council of Governments (SACOG) 2021-2024 Metropolitan Transportation Improvement Program. The proposed project is primarily funded with federal-aid from the Highway Bridge Program (HBP) administered by the Federal Highway Administration (FHWA) under delegated authority to the California Department of Transportation (Caltrans). The City Traffic Impact Mitigation (TIM) program, City Measure H Fund, City Measure L Fund, and Water and Sewer enterprise funds are providing the local match to the federal funds.

3.2 Proposed Project Setting

3.2.1 Proposed Project Location

The proposed project is located in downtown City of Placerville, El Dorado County, California. The proposed project footprint includes the bridge over Hangtown Creek on Clay Street and the intersections of Main Street/Clay Street and Main Street/Cedar Ravine Road. The topography of the project site is relatively flat (with the exception of the creek channel banks) and does not include slopes greater than 20 percent, with elevations ranging from approximately 1,865 feet to 1,925 feet above mean sea level. **Figure 1.2-1** for a regional map of the area and **Figure 1.2-2** for the proposed project location and existing roadway configuration.

3.2.2 Environmental Setting

The City was incorporated in 1854 and is a draw for tourists from around the region. Preservation of existing nearby features and historic character is important to the City and the community. The proposed project site is located on the edge of the downtown historic area of the City and includes transportation facilities (Clay Street, Main Street, and Cedar Ravine Road) surrounded by general land uses of commercial, residential, and recreational. Specifically, the City's General Plan (City of Placerville 2016) identifies

the land use designations surrounding the proposed project as CBD (Central Business District), C (Commercial), BP (Business Professional), HDR (High-Density Residential), and MDR (Medium Density Residential) (**Figure 3.2-1)**.

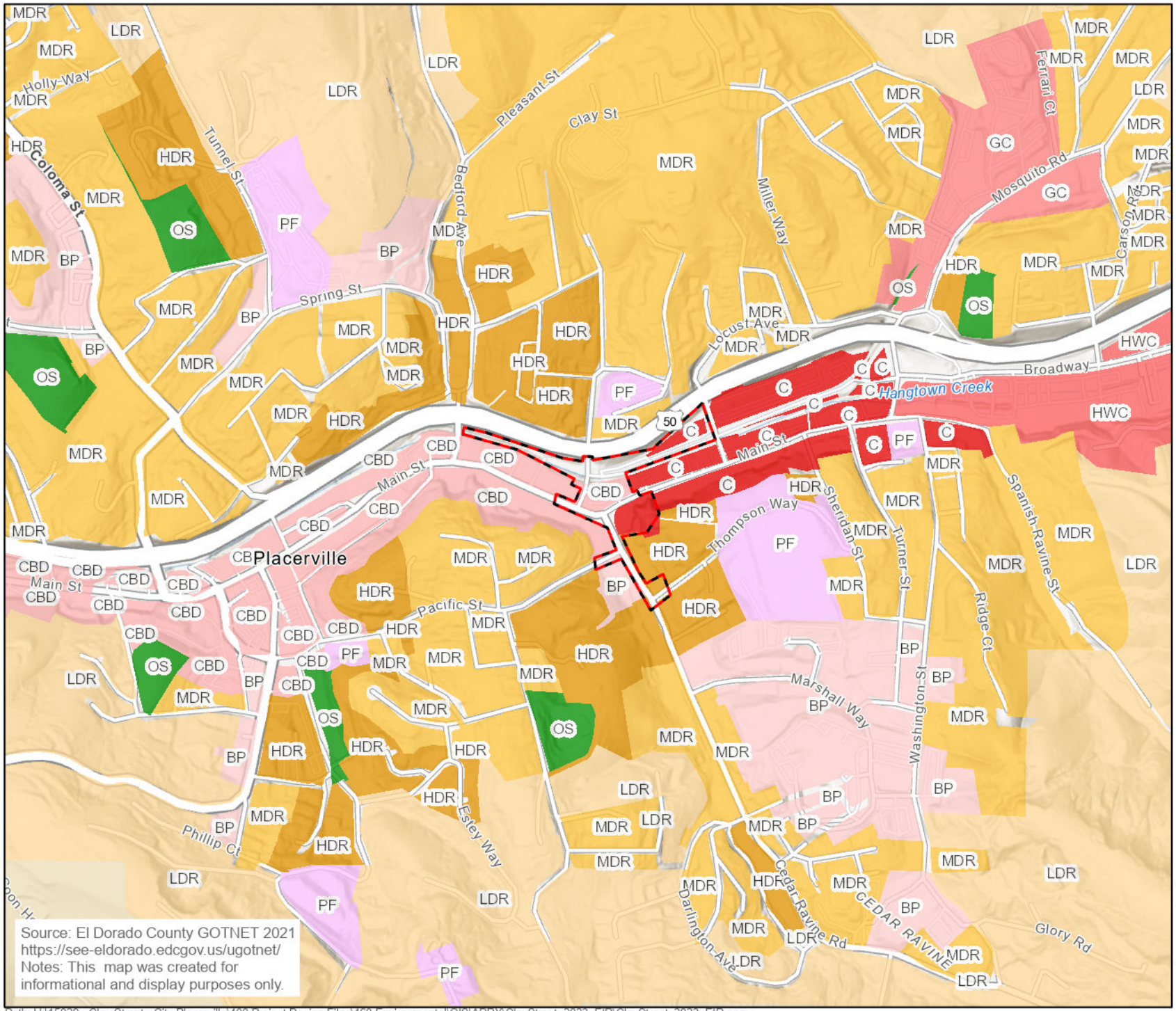
The City's Zoning Atlas (City of Placerville 2018) identifies the zone classifications surrounding the proposed project to include C, CBD, R-3 (Multi-Family Residential, 12 dwellings per acre), R1-6 (Single Family Residential 6000 square-foot minimum), and BP (Business Professional). Additionally, the proposed project vicinity overlaps or abuts with two locally designated historic districts, the Bedford Avenue-Clay Street Historic Residential District and the Cedar Ravine Historic Residential District.

The Clay Street Bridge (25C-0017) has an estimated construction year of 1926 and carries only one lane of two-way traffic across Hangtown Creek and has a clear width of 17 feet between two low profile concrete barriers and a narrow at-grade sidewalk located on the west side of the bridge; the total bridge width is approximately 19 feet. It is an earth-filled closed-spandrel concrete arch structure, approximately 32 feet long, supported by concrete spread footings. There are no as-built bridge plans on record regarding the bridge and its design. However, the City has done testing to assess and confirm existing concrete strength, structural fill integrity, and reinforcement spacing. The bridge connects to a two-lane roadway (Clay Street) to the north and south. The one-lane bridge currently accommodates shared vehicular and bicycle northbound and southbound traffic, and the substandard sidewalk on the west side of the bridge allows pedestrians to access the El Dorado Trail and the residential neighborhoods north of the bridge.

The Clay Street Bridge was inspected by Caltrans in 2020 and has an overall Sufficiency Rating (SR) of 52.6 out of 100, a decrease from the 62.6 SR in the 2016 inspection reports, showing a dramatic decline over a four-year period. The Clay Street Bridge is a single-lane bridge that does not meet current design and safety standards and, because of its age, is eligible for replacement under HBP guidelines. The current scope approved by Caltrans (which administers the HBP program in California) includes replacement of the existing bridge.

While a SR of less than 80 qualifies the bridge for rehabilitation, Caltrans' HBP guidelines require concurrence from Caltrans Structures Local Assistance (SLA) for replacement when the SR is greater than 50. However, because bridge life spans are considered obsolete at 75 years and the poor condition/health of the bridge, this bridge qualifies for replacement. Due to the additional width required to meet minimum American Association of State Highway and Transportation Officials (AASHTO) design and safety standards for the projected Average Daily Traffic (ADT), to meet the Americans with Disabilities Act (ADA) requirements for sidewalks, and given the age of the existing bridge, the City determined full replacement of the bridge was the appropriate option. The City provided justification to Caltrans SLA demonstrating that replacement is the most feasible option for the proposed project; SLA concurred with the replacement option.

City of Placerville Land Use Map



Source: El Dorado County GOTNET 2021
https://see-eldorado.edcgov.us/ugotnet/
Notes: This map was created for informational and display purposes only.

Path: U:\15029 - Clay Street - City Placerville\400 Project Design Files\460 Environmental\GIS\APRX\ClayStreet_2023_EIR\ClayStreet_2023_EIR.aprx

Clay Street Bridge Replacement Project

Figure 3.2-1

Legend

- Proposed Project Area

Landuse

- Rural Residential
- Low Density Residential
- Medium Density Residential
- High Density Residential
- Business & Professional
- Central Business District
- Convenience Commercial
- General Commercial
- Highway Commercial
- Commercial
- Planned Development Industrial
- Open Space
- Public Facility
- Agricultural Commercial
- Right-of-Way

N

0 1,000 US Feet

Author: I. Ciraulo
Last updated on Friday, November 3, 2023

Dewberry

Although the Bridge Inspection Report (BIR) lists the existing bridge as being constructed in 1940, historical records held by the City indicate the bridge was likely built in the 1920s, and specifically, estimated at 1926, putting its age closer to 100 years old. Caltrans inspection has also noted undermining of the slope protection at the north abutment, as well as spalling and deterioration of the concrete railings.

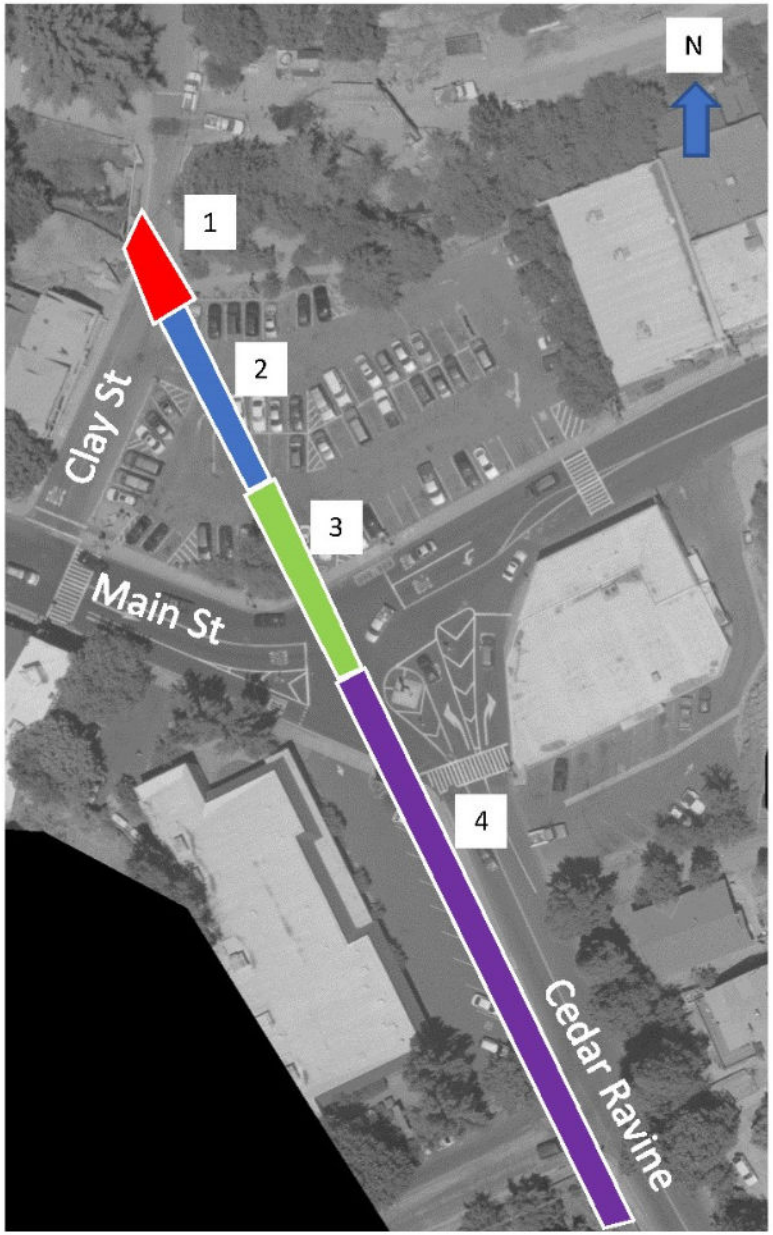
In June of 2023, the City conducted supplemental testing to further determine the bridge's structural integrity. Ground Penetrating Radar (GPR), Schmidt Hammer Testing, core drilling, and visual observations were made to assesses concrete strength, reinforcement spacing, and structural fill integrity (Youngdahl 2023). Reinforcement size and spacing information was documented and indicated and areas where rebar is and is not present were noted. Using Schmidt Hammer Testing, core samples were taken to verify concrete strength of the bridge, which ranged from 2,750 psi to 5,600 pounds per square inch (psi). Minimum design strength for structural concrete for current standards is 3,600 psi. The sidewalk at the bridge deck was also cored to verify fill material, which is considered a structural component of the bridge. The earthen fill material was noted as moist and comprised of decomposed slate with pieces of wood (organic materials) and was not well compacted, which confirms that it was not providing any structural strength to the bridge (**Appendix C)**.

Adjacent to the bridge, the Ivy House parking lot is owned and operated by the City and is located on the northeast corner of the Main Street/Clay Street intersection, between Main Street and Hangtown Creek. Clay Street is a two-lane, north-south local road within the proposed project area, starting at Main Street (minor arterial). It then crosses under U.S. Highway 50 (US 50) and turns east to ultimately ends at Mosquito Road (minor arterial). FHWA and the City's General Plan currently classifies Clay Street as a local road. Clay Street has a southbound stop sign at the intersection with Main Street. Main Street is a two-lane east–west minor arterial. Cedar Ravine Road is a two-lane north–south minor arterial that intersects Main Street, east of Clay Street; the Main Street/Cedar Ravine Road intersection is a three-way stop-controlled intersection.

Given the close proximity of the Main Street/Clay Street and Main Street/Cedar Ravine Road intersections, long queues routinely back up on Main Street making turning into and out of Clay Street difficult. Main Street currently has uncontrolled midblock crosswalks near both intersections which adds to the congested conditions. The proximity of the Main Street/Clay Street and Main Street/Cedar Ravine Road intersections, along with current congested traffic conditions, has resulted in a history of numerous vehicular collisions and near-miss bicycle and pedestrian incidents.

A monument to the California Druids (the Druid Monument), is a local landmark prized by the community. It is located in the center of Main Street/Cedar Ravine Road intersection, amidst intersection traffic and turning movements. The mature cork oak tree located in the Ivy House parking lot on the north side of the Main Street/Cedar Ravine Road intersection is cherished by the community as well.

Cedar Ravine Culvert Overview







1 – Outlet at creek; consists of concrete arch-shaped cover that is integral with bridge abutment.

2 – 66-inch diameter corrugated metal pipe



3 – Concrete box shape; board-formed concrete walls and smooth concrete roof



4 – Concrete walls with corrugated metal decking for roof



Clay Street Bridge Replacement Project

Figure 3.2-2

Author: I. Ciraulo
Last updated on Monday, January 22, 2024

Dewberry

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Hangtown Creek is the primary aquatic feature within the proposed project site. Hangtown Creek flows west through the proposed project area, draining into Weber Creek approximately 4.5 river miles downstream (northwest). Cedar Ravine, a tributary to Hangtown Creek, consists of an open channel along Cedar Ravine Road, south of Pacific Street, and transitions to a closed conduit constructed of various materials and geometrics with varying ages beginning near Pacific Street to the outfall at Hangtown Creek, located within the south abutment of the Clay Street Bridge (**Figure 3.2-2)**. The culvert is made of various geometric shapes (arch, box, etc.) and made from various materials (concrete, bridge, corrugated steel). It also has a series of utilities that are sleeved through the culvert. The culvert has failed in the past and has been repaired several times, with the most recent repair in 2018 as part of the Pacific Street paving project when it was discovered that a portion of the culvert top was found unstable and was replaced as part of that work. Other more extensive repairs occurred in the 1970's, in 2003, and again in 2005. It is also important to note that the culvert runs directly adjacent to the footing of the Druid Monument located within the intersection of Main Street and Cedar Ravine Road, placing the monument in immediate danger of damage should the culvert fail at that location.

The banks of Hangtown Creek vary in composition from natural embankment to concrete walls of assorted construction. Existing natural vegetation is limited to the banks of Hangtown Creek. A small creek side viewing area is located along Hangtown Creek north of the Ivy House parking lot

3.3 Project Objectives

The CEQA Guidelines (Section 15124[b]) require the project description to contain a statement of objectives that includes the underlying purpose of the proposed project. The following are the proposed project objectives:

A. Address safety, functionality, and structural deficiencies of the necessary crossing structure over Hangtown Creek in a manner that meets modern engineering standards for bridge and road design.
B. Improve roadway public safety, traffic operations, and access by first responders.
C. Improve pedestrian and bicyclist access and safety in the project area.
D. Minimize impacts to adjacent properties.
E. Preserve and retain the existing overall historic character.

3.4 Proposed Project

The proposed project consists of replacing the existing Clay Street Bridge with a new two-lane bridge, which necessitates realignment of Clay Street to form a new four-way intersection with Main Street and Cedar Ravine Road. **Figure 3.4-1** is a site plan that shows the locations of the bridge replacement and roadway realignment, lane configurations and striping, and pedestrian/bicycle improvements. **Figure 3.4-2** is a

visual simulation that provides an aerial overview of the proposed project. Additional details about the proposed project components are provided below.

3.4.1 Clay Street Hangtown Creek Bridge

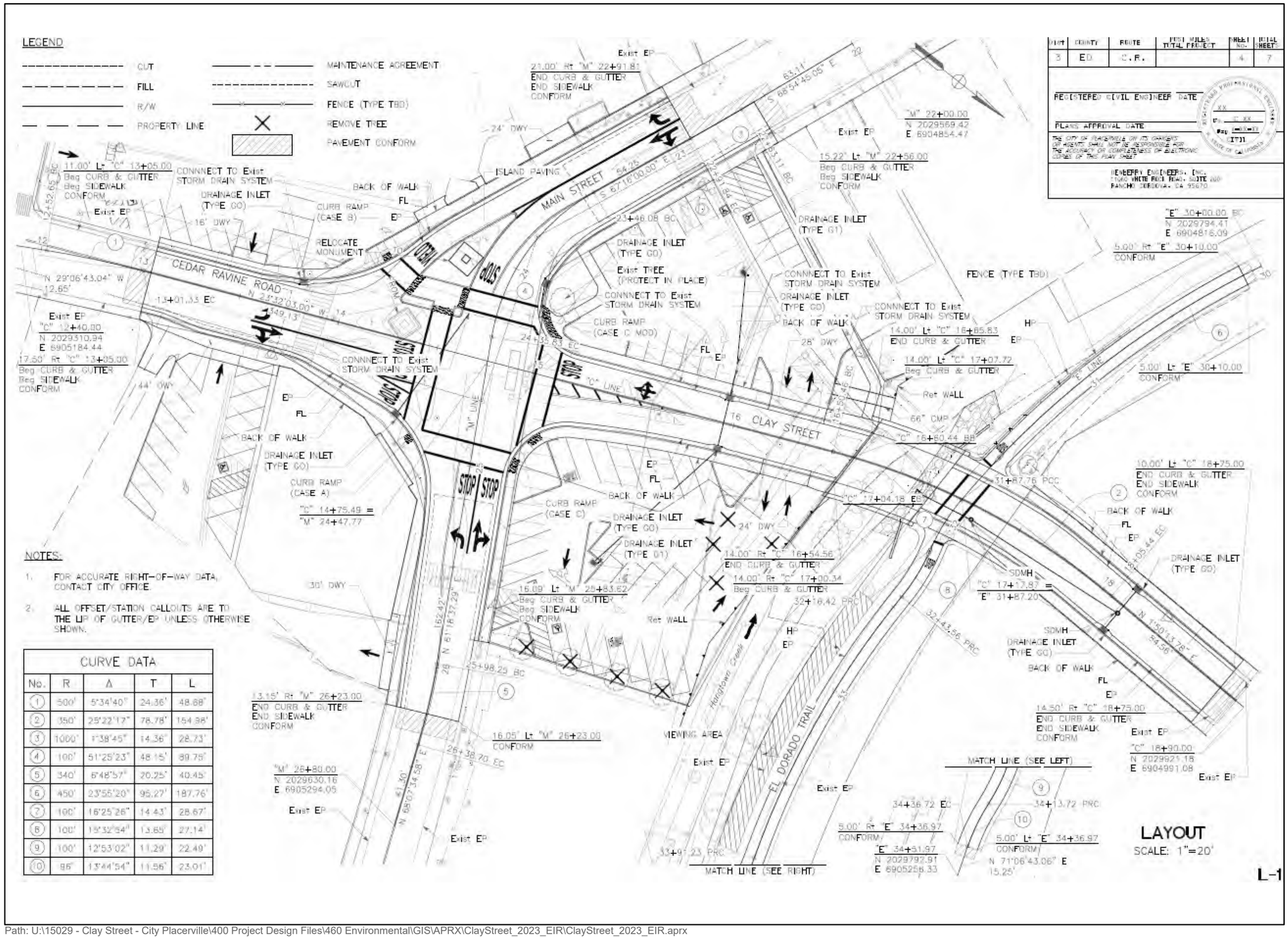
The proposed new bridge would be approximately 37 feet long and have a minimum width of 40 feet. The bridge barrier would meet AASHTO standard height for safety and include an architectural aesthetic treatment to match the surrounding area and downtown historic area character. The recommended bridge replacement type is a cast-in-place slab structure; this is an economically preferred structure alternative (relative to pre-cast concrete) given the curved horizontal alignment of Clay Street. The reconstructed Clay Street Bridge and roadway approaches would accommodate a cross-section with a two-lane street and sidewalks on both sides of Clay Street. The bridge would also accommodate bicyclists in a marked Class III bicycle facility. Pedestrian and bicycle features would allow a direct and safe connection to the El Dorado Trail, which is adjacent to the bridge, as well as a connection to the neighborhoods north of the bridge. **Figure 3.4-3** illustrates a street-level view of the replacement bridge; this is a conceptual rendering for illustrative purposes only.

3.4.2 Clay Street Realignment and New intersection Improvements

In order to accommodate the proposed bridge replacement, prevent impacts to adjacent private properties, and prevent further worsening of the poor performance of the adjacent intersections, Clay Street would be realigned to form a four-way intersection consisting of Main Street, Clay Street, and Cedar Ravine Road The geographical limits of those modifications are shown in **Figure 3.4-1** and **Figure 3.4-2**. The intersection would be a four-way stop control, with infrastructure to support a signal, if warranted in the future.

As discussed above, **Figure 3.4-1** depicts the bridge replacement and roadway realignment, lane configurations and striping, and pedestrian and bicycle accommodations. Improvements would include curb ramps and crosswalks on all four legs of the intersection that would be designed to meet ADA requirements and allow for improved mobility in the area. The proposed project would extend the sidewalk south along Cedar Ravine Road to fill in the existing gap in the sidewalk network on the east side of Cedar Ravine Road between Main Street and Pacific Street. Main Street and Clay Street would be marked with Class III bicycle facilities. **Figure 3.4-4, Figure 3.4-5, Figure 3.4-6,** and **Figure 3.4-7** illustrate simulated conceptual views of the proposed intersection as viewed from the south, west, north, and east, respectively.

Proposed Project Site Plan



NOTES:

1. FOR ACCURATE RIGHT-OF-WAY DATA, CONTACT CITY OFFICE.
2. ALL OFFSET/STATION CALLOUTS ARE TO THE LIP OF GUTTER/EP UNLESS OTHERWISE SHOWN.

CURVE DATA

No.	R	Δ	T	L
1	500'	5°34'40"	24.36'	48.68'
2	350'	25°22'17"	78.78'	154.98'
3	1000'	1°38'45"	14.36'	28.73'
4	100'	51°25'23"	48.15'	89.75'
5	340'	6°48'57"	20.25'	40.45'
6	450'	23°55'20"	95.27'	187.76'
7	100'	16°25'26"	14.43'	28.67'
8	100'	15°32'54"	13.65'	27.14'
9	100'	12°53'02"	11.29'	22.49'
10	95'	13°44'54"	11.56'	23.01'

Clay Street Bridge Replacement Project
City of Placerville, CA

Figure 3.4-1

Author: I. Ciraulo
Last updated on Friday, September 4, 2026

Dewberry

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Proposed Project Aerial Rendering



Clay Street Bridge Replacement Project

Figure 3.4-2

Author: I. Ciraulo
Last updated on Friday, November 3, 2023

Dewberry

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Proposed Bridge Rendering



Clay Street Bridge Replacement Project

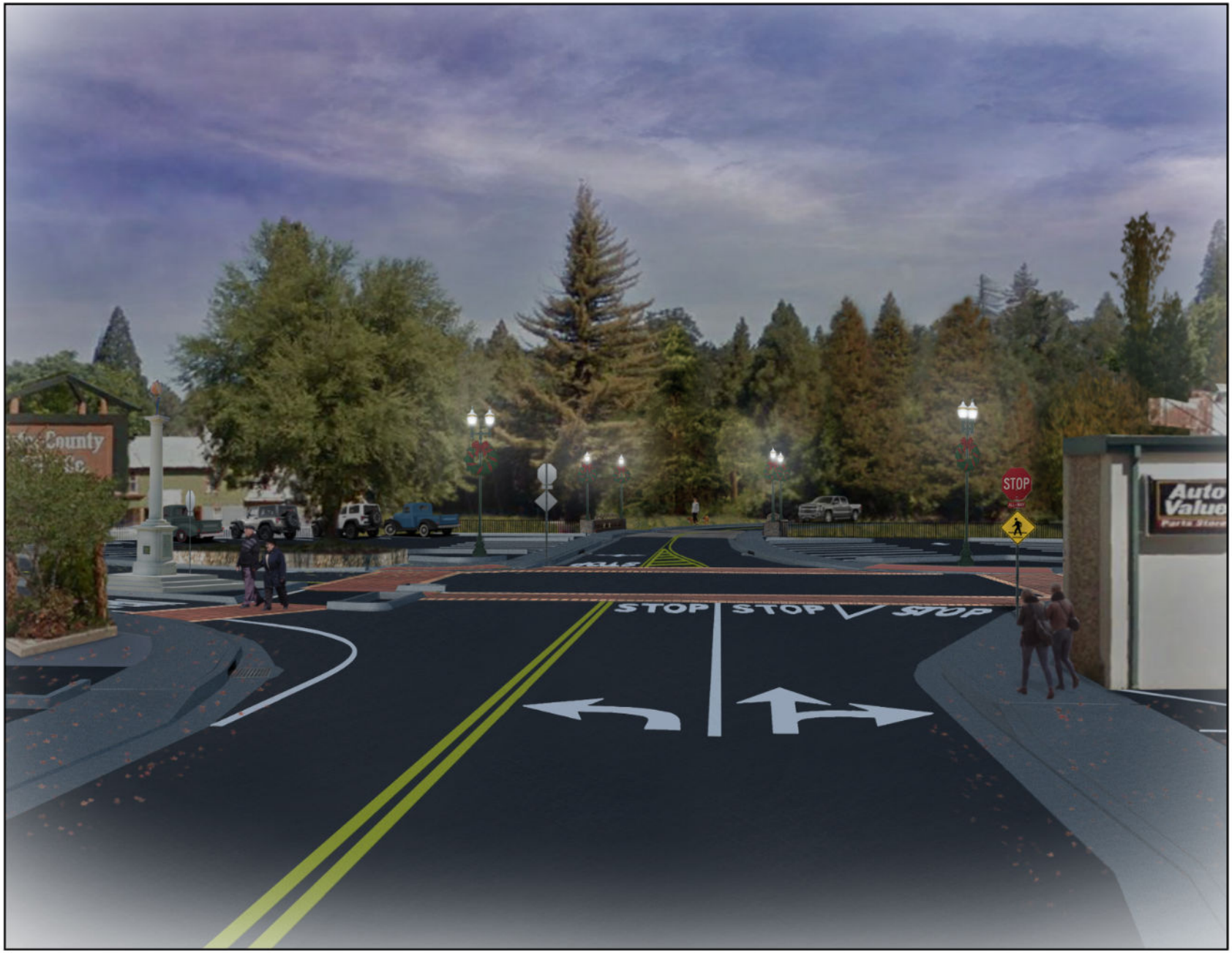
Figure 3.4-3

Author: I. Ciraulo
Last updated on Friday, November 3, 2023

Dewberry

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Proposed Project Rendering view North



Clay Street Bridge Replacement Project

Figure 3.4-4

Author: I. Ciraulo
Last updated on Friday, November 3, 2023

Dewberry

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Proposed Project Rendering view East



Clay Street Bridge Replacement Project

Figure 3.4-5

Author: I. Ciraulo
Last updated on Monday, January 22, 2024

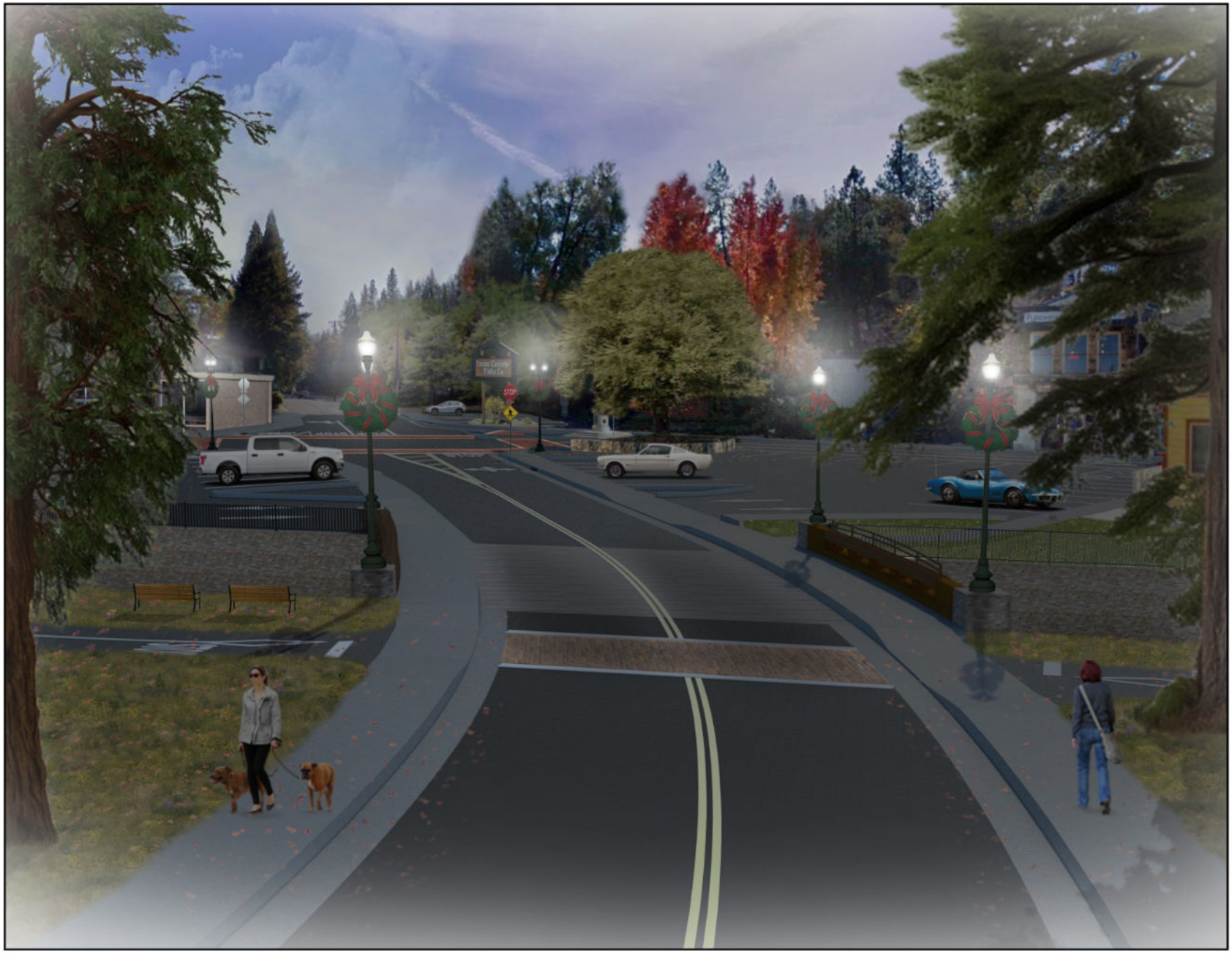
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Proposed Project Rendering view South

Clay Street Bridge Replacement Project

Figure 3.4-6



Author: I. Ciraulo
Last updated on Monday, January 22, 2024

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Proposed Project Rendering view West

Clay Street Bridge Replacement Project

Figure 3.4-7



Author: I. Ciraulo
Last updated on Monday, January 22, 2024

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3.4.3 Ivy House Parking Lot

To accommodate the proposed new bridge alignment and realignment of Clay Street, the Ivy House parking lot would be bifurcated and reconfigured into two separate parking lots, as shown in **Figure 3.4-2** and **Figure 3.4-3**. The proposed parking lots would continue to be owned and maintained by the City. Ingress and egress locations for the parking lots would be limited to Clay Street only; no direct access would be provided from Main Street.

The current creekside viewing area overlooking Hangtown Creek at the northwest corner of the Ivy House parking lot and the path leading to the viewing area would be removed and elevated to street level and relocated north of Hangtown Creek along the El Dorado Trail.

3.4.4 Druid Monument Relocation

The historic Druid Monument, currently located at the Main Street/Cedar Ravine Road intersection, would be moved to a new raised concrete protected pedestrian refuge island on Main Street, where it can be safely viewed up close by the public with minimized potential for collision with vehicles. The proposed new location for the monument is approximately 45 feet west from its current location, while still remaining within the intersection, respectfully holding to its historical intent. Relocation of the Druid Monument to a protected pedestrian refuge island is supported by the United Ancient Order of the Druids, Historic Monument Committee. **Figure 3.4-4, Figure 3.4-5, Figure 3.4-6,** and **Figure 3.4-7** illustrate views of the proposed Main Street/Clay Street/Cedar Ravine Road intersection, including the proposed relocated monument, as viewed from the south, west, north, and east, respectively. As previously mentioned, these figures are conceptual renderings for illustrative purposes only.

3.4.5 Landscaping and Lighting

The proposed project would include new landscaping along the north side of Main Street at the proposed Main Street/Clay Street/Cedar Ravine Road intersection. Modifications would be required to the stone planter that contains the cork oak tree; however, the cork oak tree would be preserved in place. Lighting would be added to the new bridge. Existing lighting within the proposed project site would be assessed and adjusted along Main Street and the realigned portion of Clay Street for safety and wayfinding.

3.4.6 Utility Relocation

Utilities within the proposed project site include overhead and underground electrical and communications, a 6-inch water line, sanitary sewer, and storm drain facilities. Permanent relocations of the waterline and storm drain facilities would be required. Relocation of overhead utilities would be required.

The Cedar Ravine culvert outlets to Hangtown Creek and is integral with the south abutment/retaining wall of the existing Clay Street Bridge. Approximately 150 feet of the

Cedar Ravine culvert between Main Street and the existing Clay Street Bridge would be replaced or reconstructed due to the proposed parking lot reconstruction and bridge replacement. Additional length of the culvert may also be reconstructed as part of the project through the intersection of Main Street and Cedar Ravine Road and will be determined when the project enters into final design.

3.4.7 Right-of-Way

The proposed project would not require the acquisition of any permanent right-of-way. Temporary construction easements would be required from two parcels (Assessor's Parcel Numbers [APNs] 317-14-10 and 401-13-81) located adjacent to the proposed project site. The proposed project would encroach into the State's right-of-way, where Clay Street crosses under US 50, during the construction phase, thus, an encroachment permit from Caltrans would be required. In addition, modifications to the existing Freeway Maintenance Agreement between the City and Caltrans would be required to accommodate the minor change in geometry of Clay Street for the small segment located within the State's right-of-way.

3.4.8 Construction Activities

Construction is expected to begin Spring 2029 and take approximately 9 to 12 months to complete:

- Clearing and grubbing and tree removal (approximately 20 trees) or trimming as needed.
- Installation and preparation for utility relocations.
- Demolition of bridge, existing retaining walls, sidewalks, and asphalt.
- Importation of up to 50 cubic yards of fill material for finish grading and structural backfill.
- Construction of the new bridge abutments, wingwalls, roadway paving, placement of sidewalk, curb, gutter, relocation of the historic Druid Monument, and all associated improvements.
- Installation of signing and striping.

Stream flow in Hangtown Creek would be diverted into pipe(s) through the active construction zone. The diversion would be established in conformance with City and County specifications as well as California Department of Fish and Wildlife (CDFW), Central Valley Regional Water Quality Control Board (CVRWQCB), U.S. Army Corps of Engineers (USACE), and U.S. Fish and Wildlife Service (USFWS) regulatory requirements. The stream diversion would be constructed within the existing channel to protect water flowing in Hangtown Creek from demolition and construction activities. Materials to construct the diversion would consist of pipe(s) as needed to convey flow rates anticipated during construction, and sandbags and plastic sheeting to construct diversion dams in the channel upstream and downstream of the site. All stream diversion work would be contained within the area of disturbance. Equipment used

would include light truck-mounted cranes above the channel, with small earthwork equipment and laborers within the channel between the diversion dams. The operational timeline for the stream diversion would likely be late April through October, depending on the permit restrictions imposed by the resource agencies.

Table 3.4-1 provides a description of the type of equipment likely to be used during the construction of the proposed project.

TABLE 3.4.1 CONSTRUCTION EQUIPMENT	
EQUIPMENT	**CONSTRUCTION PURPOSE**
Hydraulic Hammer	Demolition
Hoe ram	Demolition
Jack Hammer	Demolition
Water Truck	Earthwork construction + dust control
Bulldozer / Loader	Earthwork construction + clearing and grubbing
Haul Truck	Earthwork construction + clearing and grubbing
Front-End Loader	Dirt or gravel manipulation
Grader	Ground grading and leveling
Dump Truck	Fill material delivery
Bobcat	Fill distribution
Excavator	Soil manipulation and placement of rock slope protection
Compaction Equipment	Earthwork
Roller / Compactor	Earthwork and asphalt concrete construction
Backhoe	Soil manipulation + drainage work
Drill Rig	Construction of drilled or driven pile foundations
Holding tanks	Slurry storage for pile installation
Crane	Placement of false work beams
Concrete Truck and Pump	Placing concrete
Paver	Asphalt concrete construction
Truck with seed sprayer	Erosion control landscaping
Generators	Power Hand Tools
Barges	Construction access and transportation of large structural components

During construction, Clay Street would be closed between Main Street and just north of the US 50 overpass. Traffic accessing the portion of Clay Street immediately north of US 50 would be detoured via northbound Bedford Avenue to Coleman Street to Clay Street or northbound Mosquito Road to Clay Street. The total detour length is approximately 1 mile. Access to residences along Clay Street would be maintained at all times during construction. The portion of the El Dorado Trail that crosses Clay Street and a short distance to the east and west would also be closed temporarily, but a detour would be available at Locust Avenue (to Main Street) and at Bedford Avenue (to Main Street). Pedestrian and bicycle access will be provided during the duration of construction.

3.5 Entitlements Required

The City, as lead agency for the proposed project under CEQA, has discretionary authority over the primary project proposal. The following City actions would be taken for the approval and construction of the proposed project:

- City Council certification of the Final EIR and Mitigation Monitoring and Reporting Plan
- City Council approval of the project design and release of bid documents for public bidding
- City Council construction contract award

Table 3.5-1 identifies federal and state agency permits, reviews, and approvals are required for proposed project construction from other responsible and trustee agencies.

TABLE 3.5.1 FEDERAL AND STATE PERMITS AND APPROVALS NEEDED

AGENCY	PERMIT/APPROVAL	STATUS
Caltrans/FHWA	NEPA Clearance	Follows approval of technical studies and final Environmental Assessment (EA)/Finding of No Significant Impact (FONSI)
Caltrans	Encroachment Permit	Follows Final CEQA approval and prepared during Final Design.
U.S. Army Corps of Engineers	Section 404 Permit- Nationwide Permit #14 (Linear Transportation Projects) for filling or dredging waters of the United States.	Follows Final NEPA approval and prepared during Final Design.
Central Valley Regional Water Quality Control Board	Section 401 Water Quality Certification	Follows Final CEQA approval and prepared during Final Design.
California Department of Fish and Wildlife	Section 1602 Streambed Alteration Agreement	Follows Final CEQA approval and prepared during Final Design.
Office of Historic Preservation	Section 106 Clearance	Follows approval of the Programmatic Agreement (PA) and Management Plan

3.6 Cumulative Projects

CEQA requires that an EIR evaluate a project's cumulative impacts. Cumulative impacts are a project's impacts combined with the impacts of other related past, present, and reasonably foreseeable future projects. As set forth in the CEQA Guidelines, the discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. As stated in CEQA Statute Section 21083(b)(2), a project may have a significant effect on the environment if "the possible effects of a project are individually limited but cumulatively considerable."

According to the CEQA Guidelines Section 15355, "cumulative impacts" refers to two or more individual effects, which, when considered together, are considerable and which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probably future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

In addition, as stated in the CEQA Guidelines Section 15064(h)(4), it should be noted that the "mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable." Cumulative impact discussions for individual topic areas are provided at the end of each technical analysis contained within each of the **Chapter 4** sections, under subheader **Cumulative Impacts**. As previously stated, and as set forth in the CEQA Guidelines Section 15355, related projects consist of "closely related past, present, and reasonably foreseeable probable future projects" that would likely result in similar impacts and are located in the same geographic area. The cumulative area is defined based on the technical resource; however, the cumulative study area used to identify the cumulative projects list, was determined to be the City's General Plan area.

Table 3.6-1 provides a list of past, present, and reasonably foreseeable future projects that are considered as part of the cumulative impact analysis within this EIR, and are within the City limits. Certain resources require consideration of a larger geographic area; for those specific resources, additional cumulative information on geographic area and projects is provided within the EIR technical resource section. Finally, for some resources, the cumulative analysis is based on projected growth within the City or the region.

TABLE 3.6.1 CUMULATIVE PROJECT LIST			
PROJECT NAME	**CHARACTERISTICS**	**LOCATION**	**STATUS**
Cottonwood Park – Phase 4 & 6, Tentative Subdivision Map (TSM) 2005-01	39-unit single-family residential subdivision on approximately 22.2 acres. Phase 4 consists of 19 single-family lots (Lots 1-19) on 6.2 acres. Phase 6 consists of 20 single-family lots (Lots 20-39) on approximately 16 acres.	North of Clay Street, east of Cottonwood Park Apartments APNs 002-051-27, 002-071-33, and 002-071-34	Approved (2005) Final Map Recorded November 9, 2023
Astonia Estates Subdivision, Tentative Subdivision Map (TSM) 99—02	38-unit single-family residential subdivision on approximately 39.3 acres	East Airport Road south of Broadway and Taxerna Court. APNs 048-380-009 & 048-350-047	Approved (2002) Tentative Map Expired August 2023
Country Club Court Subdivision, Tentative Subdivision Map (TSM) 2006-03	Single-family residential	South Country Club Drive APN 051-520-11	Approved (2008)
Marshall Medical Center Offsite Parking and General Plan Amendment and Rezone General Plan Amendment (GPA) 12-03, Zone Change (ZC) 2012-04, Site Plan Review (SPR) 2012-04, & Conditional Use Permit (CUP) 2012-02	To amend the residential General Plan land use and zoning designations for the following APNs to Business Professional: 004-016-11; 004-061-17; 004-061-30; 004-061-37; 004-061-39; 004-061-40; 004-071-08; 004-071-09; 004-071-15; 004-071-15; 004-071-16; 004-071-17; 004-071-18; 004-071-19; 004-072-03; 004-072-04; 004-072-05; 004-072-06; 004-073-03; 004-073-04; 004-073-05; 004-073-06; 004-110-15; 051-120-01; 051-120-19 Conditional Use Permit and Site Plan Review request to grade, pave, landscape, light, and operate a 51-stall parking lot on APN 051-120-19, 3292 Washington Street, a	3292 Washington Street and the following APNs: 004-016-11; 004-061-17; 004-061-30; 004-061-37; 004-061-39; 004-061-40; 004-071-08; 004-071-09; 004-071-15; 004-071-15; 004-071-16; 004-071-17; 004-071-18; 004-071-19; 004-072-03; 004-072-04; 004-072-05; 004-072-06; 004-073-03; 004-073-04; 004-073-05; 004-073-06; 004-110-15; 051-120-01; 051-120-19	Complete (2012)

TABLE 3.6.1 CUMULATIVE PROJECT LIST			
PROJECT NAME	**CHARACTERISTICS**	**LOCATION**	**STATUS**
	conditional use in the proposed Business Professional zone.		
General Plan 2013-2021 Housing Element Implementation	Amend General Plan Land Use Section and the Housing Element, establishing Housing Opportunity (HO) Overlay land use designation; amend General Plan and Zoning designations for specific parcels to allow for optional development of multifamily dwelling units	Placerville – City-wide	Completed; Zoning Ordinance Section 10-5-24
General Plan 2013-2021 Housing Element, Implementation Program 3:	Complete General Plan Amendment and Zone Change to establish Housing Opportunity Overlay (HO) Zone for affordable housing	APNs: 323-400-020; 323-570-001 & -037; and 323-220-006 & - 008.	Completed (Resolution 8480, 8485, and 8471)
General Plan 2022-2029 Housing Element, Implementation Program A-3 Environmental Assessment (EA) 23-01, EA 23-02, and EA 23-03	Complete General Plan Amendment and Zone Change to establish Housing Opportunity Overlay (HO) Zone for affordable housing	Site 1: 001-092-027 Site 2: 325-240-016 Site 3: 325-120-030 & 325-160-008	Approved; In Progress (Resolution 9192)
Middletown Affordable Housing	82-unit affordable housing complex	323-570-001	Approved; In Progress
Mallard Affordable Housing	72-unit affordable housing complex	323-220-006 & - 008	Approved; In Progress
SPR 22-03 Clementine Affordable Housing	83-unit affordable housing complex	APNs 325-280-003 & 325-240-011	Approved (2022)
General Plan 2022-2029 Housing Element, Implementation Program B-2 & B-8	Complete identified amendments to Title 10 of the City Code, Zoning Ordinance, to comply with Assembly Bill 2162 and facilitate development of housing for special needs households.	City-wide	In Progress
General Plan 2022-2029 Housing Element, Implementation Program B-7	Complete identified amendments to Title 10 of the City Code, Zoning Ordinance, to become consistent with	City-wide	In Progress

TABLE 3.6.1 CUMULATIVE PROJECT LIST			
PROJECT NAME	**CHARACTERISTICS**	**LOCATION**	**STATUS**
	State legislation regarding Family Daycare Homes		
General Plan 2022-2029 Housing Element, Implementation Program C-1	Complete identified amendments to Title 10 of the City Code, Zoning Ordinance, to comply with recent changes to Government Code Section 65915, Density Bonus Law.	City-wide	In Progress
994 Thompson Way – Site Plan Review 2015-06	New single-family residence	994 Thompson Way	Complete (2017)
996 Thompson Way – Site Plan Review 2015-07	New single-family residence	996 Thompson Way	Complete (2016)
3001 Jacquier Road - SPR 21-03, Mackinaw Hotel	106-room, three story hotel, on- and off-site improvements	3001 Jacquier Road APN 048-209-042	Approved (2021)
SPR 22-06	Multi-family duplex	3095 Cedar Ravine Road	Approved (2022)
SPR 17-03-R, Hangtown Range	2,172-square-foot retail addition to the existing Hangtown Range	1540 Broadway	In Progress
Zone Change 14-02, Downtown Placerville Historic District	Amend the Zoning Map and Zoning Ordinance that would establish a Downtown Historic District. Draft boundaries: east to west and south involves the entire length of Main Street, including all parcels zoned Central Business District and Commercial; north: the eastbound lane of US 50. Amend the boundary of the adopted City of Placerville Historic District established by Ordinance 1280, adopted on August 25, 1981, adding four additional residential parcels (3043, 3051, 3049, and 3041 Cedar Ravine) to the Cedar Ravine		Approved (Resolution of Intent 2014-01)

TABLE 3.6.1 CUMULATIVE PROJECT LIST			
PROJECT NAME	**CHARACTERISTICS**	**LOCATION**	**STATUS**
	Residential Historic District that are zoned R-3 (Medium Density Multi-Family).		
US 50 Access Control Action Plan/"Trip to Green"	Close off all left turns, cross traffic, and other select turning movements to US 50 at the three signalized intersections in Downtown Placerville to maintain continuous green time on US 50 and alleviate congestion.	To ensure safe travel, northbound and southbound movements across US 50 at Canal Street, Spring Street (SR/Highway49), and Bedford Avenue will be closed to public traffic, allowing emergency vehicle access only. Right-in and right-out access will remain available at Spring Street, Center Street, and Bedford Avenue.	In Progress.

4. Environmental Setting, Impacts, and Mitigation Measures

4.1 Aesthetics

4.1.1 Introduction

This section of the Recirculated Environmental Impact Report (REIR) describes the existing landscape character of the Clay Street Bridge Replacement Project (proposed project) site, existing views of the surrounding area from various on-the-ground vantage points, the visual characteristics of the project site, and the landscape changes that would be associated with the construction and operation of the proposed project, as seen from various vantage points. Potential effects are evaluated relative to important visual features (e.g., scenic highways, scenic features) and the existing visual landscape and its effects on viewers.

Degradation of the visual character of a site is typically addressed through a qualitative evaluation of the changes to the aesthetic characteristics of the existing environment, and the proposed project-related modifications that would alter the visual setting. Aesthetics, as addressed in the California Environmental Quality Act (CEQA), refers to visual considerations in the physical environment. Because a person's reaction and attachment to a given viewshed are subjective, visual changes inherently affect viewers differently. Accordingly, aesthetics analysis, or visual resource analysis, is a systematic process to logically assess visible change in the physical environment and the anticipated viewer response to that change.

4.1.1.1 Visual Resource Terminology and Concepts

When viewing the same landscape, people may have different responses to that landscape and any proposed visual changes, based upon their values, familiarity, concern, or expectations for that landscape and its scenic quality. Because each person's attachment to, and value for, a particular landscape is unique, visual changes to that landscape inherently affect viewers differently. However, generalizations can be made about viewer sensitivity to scenic quality and visual changes. Recreational users (e.g., hikers, equestrians, tourists, and people driving for pleasure) are expected to have high concern for scenery and landscape character. People who are commuting daily through the same landscape generally have a moderate concern for scenery, while people working at businesses (commercial and industrial) sites generally have a lower concern for scenic quality or changes to existing landscape character. The visual sensitivity of a landscape is affected by the viewing distances at which it is seen, such as close-up or far away. The visual sensitivity of a landscape also is affected by the travel speed at which a person is viewing the landscape (high speeds on a highway, low speeds on a hiking trail, or stationary at a residence or business).

The same feature of a project can be perceived differently by people depending on the distance between the observer and the viewed object. This distance is defined as "viewing distance" or "distance zones." For the purpose of this analysis, distance zones are delineated as foreground, middleground, and background. When a viewer is

closer in proximity to a viewed object in the landscape (foreground), more detail can be seen, and there is greater potential influence of the object on visual quality because of its form or scale (relative size of the object in relation to the viewer). When the same viewed object is viewed at background distances, details may be imperceptible but overall forms of terrain and vegetation are evident, and the horizon and skyline are dominant. In the middleground, some detail is evident (like the foreground) and landscape elements are seen in context with landforms and vegetation patterns (like the background).

The following terms and concepts are used in the discussion below to describe and assess the aesthetics setting and impacts from the project.

- **Color:** The hue (e.g., red, brown,) and value (e.g., light, dark) of the light reflected by objects in the visual landscape.
- **Contrast:** The opposition or unlikeness of different forms, lines, colors, or textures in a landscape.
- **Form:** The visual mass, bulk, or shape of an object or objects in the visual landscape that appear unified. This element of visual character is usually the strongest.
- **Key View Point:** One or a series of points on a travel route or at a use area or potential use area where the view of an activity (proposed project) would be the most revealing.
- **Line:** The well-defined edges of shapes or masses created in the visual landscape by horizons, silhouettes, or human-made features. This element of visual character is usually the second strongest.
- **Texture:** The apparent surface coarseness of the visual landscape caused by the aggregation or density of surface features and vegetation (e.g., fine, medium, coarse). This element of visual character is usually the least dominant.
- **Viewshed:** The landscape that can be directly seen under favorable atmospheric conditions, from a viewpoint or along a transportation corridor.
- **View Corridor:** A view corridor is typically defined as the line of sight of an observer from a public viewpoint, looking toward an object of significance to the community (e.g., ridgeline, river, historic building) or as the route that directs the viewers attention.
- **Visual (Sensitive) Receptor:** Any scenic vista, designated scenic highway, residence, or public recreational area located within the proposed project viewshed that provide people with views of a project site.

Visual character typically consists of the landforms, vegetation, water features, and cultural modifications that impart an overall visual impression of an area's landscape. Scenic areas typically include open space, landscaped corridors, and viewsheds. Visual character is influenced by many different landscape attributes including color contrasts, landform prominence, repetition of geometric forms, and uniqueness of textures among other characteristics.

Visual quality is evaluated by identifying the vividness, intactness, and unity present in the proposed project area. The three criteria for evaluating visual quality are defined below:

- **Vividness** is the extent to which the landscape is memorable and is associated with distinctive, contrasting, and diverse visual elements.
- **Intactness** is the integrity of visual features in the landscape and the extent to which the existing landscape is free from non-typical visual intrusions.
- **Unity** is the extent to which all visual elements combine to form a coherent, harmonious visual pattern.

4.1.2 Environmental Setting

4.1.2.1 Regional Character

The proposed project is located in the foothills of the Sierra Nevada mountain range of northern California; specifically, the proposed project is adjacent to U.S. Highway 50 (US 50) between Bedford Avenue and Locust Avenue in the City of Placerville (City) in El Dorado County (County). The regional landscape is characterized by the rural and small-town/historic character of the buildings and other infrastructure in the City of Placerville (City). Topography at the proposed project site is generally flat with steep slopes present along Hangtown Creek and the U.S. Highway 50 (US 50) embankments.

The City's physical elements include the foothill environment, small-town atmosphere and rural surroundings. The City contains visual resources such as vistas, focal points of interest, landmarks, historic areas and districts (including the historic downtown area), streetscapes, and residential neighborhoods. The Main Street segment of downtown includes many historic buildings, some dating from as early as the 1850s, which define the overall visual character of the downtown area. Aesthetic values are enhanced by these buildings. The Bell Tower, the Druid Monument, veterans memorials, and other visual amenities are among the downtown area's distinctive visual landmarks.

4.1.2.2 Local Character

The proposed project site is located on the edge of the downtown historic area of the City, one of the City's most defined areas. The downtown area is bounded on the north by US 50, on the south by Reservoir Street, on the east by Cedar Ravine Road, and on the west by Sacramento Street. The proposed project site's man-made visual features include the existing Clay Street Bridge, Clay Street between US 50 and Main Street, the Ivy House parking lot, Main Street between Clay Street and Cedar Ravine Road, Cedar Ravine Road, the Druid Monument, and the El Dorado Trail located north of, and parallel to, Hangtown Creek. Overhead utilities are visible throughout the proposed project site along Main Street, Clay Street, and Cedar Ravine Road. Natural

visual features include the riparian area along Hangtown Creek and landscaping along Main Street (including the cork oak tree), Clay Street, and Cedar Ravine Road.

The Clay Street Bridge is a low and narrow concrete arch bridge representative of the early twentieth century era of transportation architecture. Within the context of its surroundings, the bridge provides visual interest east and west on the El Dorado Trail and contributes to the quaint character of Clay Street, but it is not unique or aesthetically noteworthy.

Clay Street, between US 50 and Hangtown Creek, is a two-lane roadway that transitions to a narrow one-lane bridge over Hangtown Creek and transitions back to a narrow two-lane roadway between Hangtown Creek and Main Street. Clay Street is part of the City's early network of streets. Like similar streets elsewhere in the City, these narrow, or single-lane, roadways are appreciated by the public for their quaint character. However, the overall scale of Clay Street and the bridge features are substantially diminished by the surrounding features. The US 50 overcrossing at Clay Street dominates views from Main Street to the north, with mature trees along Hangtown Creek and adjoining US 50 also contributing to the visual mass of the structure.

The Ivy House parking lot is visually prominent within the proposed project site and for views from Main Street, Clay Street, Cedar Ravine Road, the El Dorado Trail, and surrounding buildings because of its large expanse of pavement, light poles, and signage. Its southern edge is defined by a short planter made of stone, that contains sparse landscaping and a mature cork oak tree. This cork oak tree is considered an important visual amenity to the community. The parking lot itself is not historic but the south and west sides of the parking lot are surrounded by decorative rock walls.

The Druid Monument is a 20-foot-tall stone monument set in the intersection of Main Street and Cedar Ravine Road. It consists of a circular stone pillar mounted on a square base set on a concrete platform of three ascending steps. A variegated orange and red stained-glass flame atop a metal torch is set on the top of the pillar. This monument is visually prominent within the intersection. It is considered historic and exhibits unique and special visual qualities.

The El Dorado Trail, which parallels the north bank of Hangtown Creek and intersects with Clay Street, is a paved pedestrian/bicycle trail that physically and visually divides mature trees and understory of Hangtown Creek. Views of Hangtown Creek itself, do not exhibit special visual qualities. The creek channel is an assortment of concrete walls, sewer and utility lines and natural bank. A large redwood tree at the northwest corner of the trail is visually prominent because of its height; however, it is surrounded by other mature trees. Riparian vegetation along Hangtown Creek provides visual relief against the backdrop of US 50, which is elevated over Clay Street, for viewers south of Hangtown Creek.

4.1.2.3 Light and Glare

The existing sources of nighttime lighting within and adjacent to the proposed project site are vehicles traveling on roadways, streetlights, parking lot lighting, and light emitting from the interiors and exteriors of nearby commercial and residential buildings. There are acorn-style streetlights along the north side of Main Street. There is cobra-head-style lighting on the east side of Clay Street and within the Ivy House parking lot.

The Ivy House parking lot is an existing source of daytime glare from the sun reflecting on vehicle windshields.

4.1.3 Regulatory Setting

4.1.3.1 Federal

NATIONAL ENVIRONMENTAL POLICY ACT

The National Environmental Policy Act (NEPA) of 1969, as amended, establishes that the federal government use all practicable means to ensure all Americans safe, healthful, productive, and *aesthetically* (emphasis added) and culturally pleasing surroundings (42 United States Code [USC] 4331[b][2]). To further emphasize this point, the Federal Highway Administration (FHWA), in its implementation of NEPA (23 USC 109[h]), directs that final decisions on projects are to be made in the best overall public interest taking into account adverse environmental impacts, including among others, the destruction or disruption of aesthetic values.

NATIONAL SCENIC BYWAYS PROGRAM

The National Scenic Byways program is part of the U.S. Department of Transportation, FWHA. The program was established under the Intermodal Surface Transportation Efficiency Act of 1991 and was reauthorized in 1998 under the Transportation Equity Act for the 21st Century. Under the program, the U.S. Secretary of Transportation recognizes certain roads as National Scenic Byways or All-American Roads based on their archaeological, cultural, historic, natural, recreational, or scenic qualities. There are no officially designated National Scenic Byways identified in the vicinity of the project site (FHWA 2023).

4.1.3.2 State Plans, Policies and Regulations

CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA Guidelines define a “significant effect” on the environment to mean a “substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance” (California Code of Regulations [CCR], Title 14, Section 15382 2010).

CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)

The California Scenic Highway Program preserves and protects scenic highway corridors from changes that would diminish their aesthetic value. The California Department of Transportation (Caltrans) designates scenic highway corridors and establishes those highways that are eligible for the program. The program was created in 1963 with the enactment of the State Scenic Highways Law. The street and highway code includes a list of those highways that are either eligible for designation or are designated (Caltrans 2023). US 50 is an officially designated State Scenic Highway (Caltrans 2023).

4.1.3.3 Regional Plans, Policies, and Regulations

CITY OF PLACERVILLE GENERAL PLAN

The City General Plan includes Section V, Natural, Cultural, and Scenic Resources, which contains goals and policies to preserve, protect, enhance, and promote the City's valuable natural, cultural, and scenic resources. In addition, Section VII, Community Design, includes goals and policies to preserve and enhance the existing community character and sense of place by developing projects and programs that build upon positive design features.

The following goals and policies from the 2004 General Plan are relevant to aesthetics.

Section V: Natural, Cultural, and Scenic Resources section

Goal I: To protect and enhance Placerville's community character and scenic resources.

Policy I.1: Those positive aspects and attributes of the city which are controllable, and which contribute to the quality of life of the city and its environment, shall be preserved and perpetuated. Placerville's positive aspects and attributes are its rural country atmosphere, historical heritage, small town atmosphere, compatible neighborhoods and development, and lack of congestion.

Policy I.4: The City shall condition development approvals to protect natural features such as rock outcrops and trees.

Policy I.5: The City shall preserve creeks in as natural a state as possible.

Policy I.6: The City shall protect the visual character of scenic street and highway corridors.

Section VII Community Design section

Goal A: To preserve and enhance the overall visual attributes of Placerville.

Policy A.1: The City shall protect and manage Placerville's tree cover for ecological, aesthetic, and economic reasons.

Policy A.4: The City shall make every effort to protect riparian vegetation. To this end, buildings and improvements will be set back from watercourses.

Policy A.5: To retain the natural landscape of Placerville, introduced plants in public and private landscaping should be subordinate to and compatible with existing natural vegetation. The use of native and drought-resistant plants will be encouraged.

Policy A.6: The City shall maintain and/or enhance the visual character of scenic street and highway corridors.

Goal D: To upgrade the visual qualities and functional efficiency of Placerville's local streets.

Policy D.1: Future road development shall be planned to conform to the topography and to take advantage of views and vistas. The City shall ensure that new street projects are designed to minimize impact on terrain and natural vegetation.

Policy D.2: The City shall attempt to preserve existing trees within street rights-of-way and encourage preservation of all mature trees on private property where visible from the street and where feasible.

Policy D.3: The City shall promote the installation and maintenance of landscaping in public and private areas appropriate to street type, surrounding architecture, general character of the district, and street beautification programs.

Policy D.4: The City shall use the city street system as the unifying framework of the community through the use of distinctive street design and landscape treatment.

Policy D.5: The City shall require landscaping in any street design that adversely impacts the visual character of a neighborhood.

Goal I: To promote architectural quality throughout Placerville.

Policy I.1: The City shall ensure that new development will be a positive addition to the city's environment and not detract from the nature and character of appropriate nearby established development because of architectural style, scale, or location.

CITY OF PLACERVILLE MAIN STREET STREETSCAPE DESIGN DEVELOPMENT PLAN

The City Main Street Streetscape Design Development Plan provides a detailed description of the forms, materials, quantities, configurations, and costs associated with the full realization of the Main Street streetscape vision. The three underpinning objectives of this plan's goal are to preserve and enhance the historical character and assets of downtown, improve the pedestrian shopping experience and thus bolster downtown's retail economic viability, and develop a plan that is aesthetically cohesive and economically viable, a plan that can be implemented through a multi-phase and multi-year effort.

This plan identified a design and recommended the adoption of a roundabout for the realignment of Clay Street as set forth in the Placerville Streetscape Design Concept

Design (pp. II-18 through II-20; III-5). However, due to public opposition, the roundabout was removed as an alternative for this proposed project on July 8, 2014, by City Council resolution and subsequent passage of Measure K that prohibits roundabouts. Thus, this proposed project includes the realignment of Clay Street to form the fourth leg of the Main Street/Cedar Ravine Road intersection, which would serve the same purpose, and the design concepts shown on page III-5, and overall design elements for Main Street (e.g., streetscape, streetlights, seating, street trees, and accent planting) would still apply to the proposed project.

CITY OF PLACERVILLE DEVELOPMENT GUIDE

Chapter VI, Landscape Design Guidelines, Section F directs that driveways and street intersections require special plantings and accent treatments and should clearly identify these nodes for pedestrians as well as motorists. Focal elements that terminate views such as water features, public art, or other monumentation are encouraged in these areas, located as not to impede circulation and as not to pose risks for public health and safety. Features in the streetscape such as the Bell Tower, the Druid Monument, veterans' memorials, and other visual amenities define spaces and create distinctive landmarks. Signage used in these focal areas must exemplify high standards of quality and durability in materials and design.

Chapter XI, Lighting, Section B, establishes requirements for lighting along public rights-of-way.

1) Streetlights and other features within public rights-of-way will reflect a simple design theme of the type and quality illustrated in this section.
2) Streetlights should be consistent throughout the City on similar street types.
3) Light standards and fixtures will be painted 'forest' green in the streetscapes and public spaces throughout Placerville.
4) Lighting of signs should be subdued and indirect, illuminating the area of the sign only. All signs, entry monumentation, public art, directories, kiosks, or other streetscape elements should be illuminated by concealed fixtures.

4.1.4 Methodology and Thresholds of Significance

This section describes the impact analysis relating to aesthetics for the proposed project. It describes the methods used to determine the impacts of the project and lists the thresholds used to conclude whether an impact would be significant. Measures to mitigate (i.e., avoid, minimize, rectify, reduce, eliminate, or compensate for) significant impacts accompany each impact discussion, where applicable.

4.1.4.1 Methodology

Potential impacts to visual resources within the vicinity of the proposed project site were evaluated based on the following criteria: (1) existing visual quality and scenic attributes of the landscape; (2) location of sensitive receptors in the landscape; (3)

assumptions about receptors' concern for scenery and sensitivity to changes in the landscape; (4) the magnitude of visual changes in the landscape that would be brought about by implementation, construction, and operation of the project; and (5) compliance with Federal, State, and local policies for visual resources. Photographs of existing landscape conditions and computer-generated photo-montages are provided in the discussion section to accurately portray the project and changes to the visual character of the landscape

VISUAL ASSESSMENT UNITS

A visual assessment unit (VAU) has its own visual character and visual quality. A VAU is typically defined by the limits of a particular viewshed; however, for this proposed project, a VAU is defined by similar landscape settings. One VAU was identified within the proposed project area:

Visual Assessment Unit 1 (VAU1): Developed-Historic Downtown-Hangtown Creek

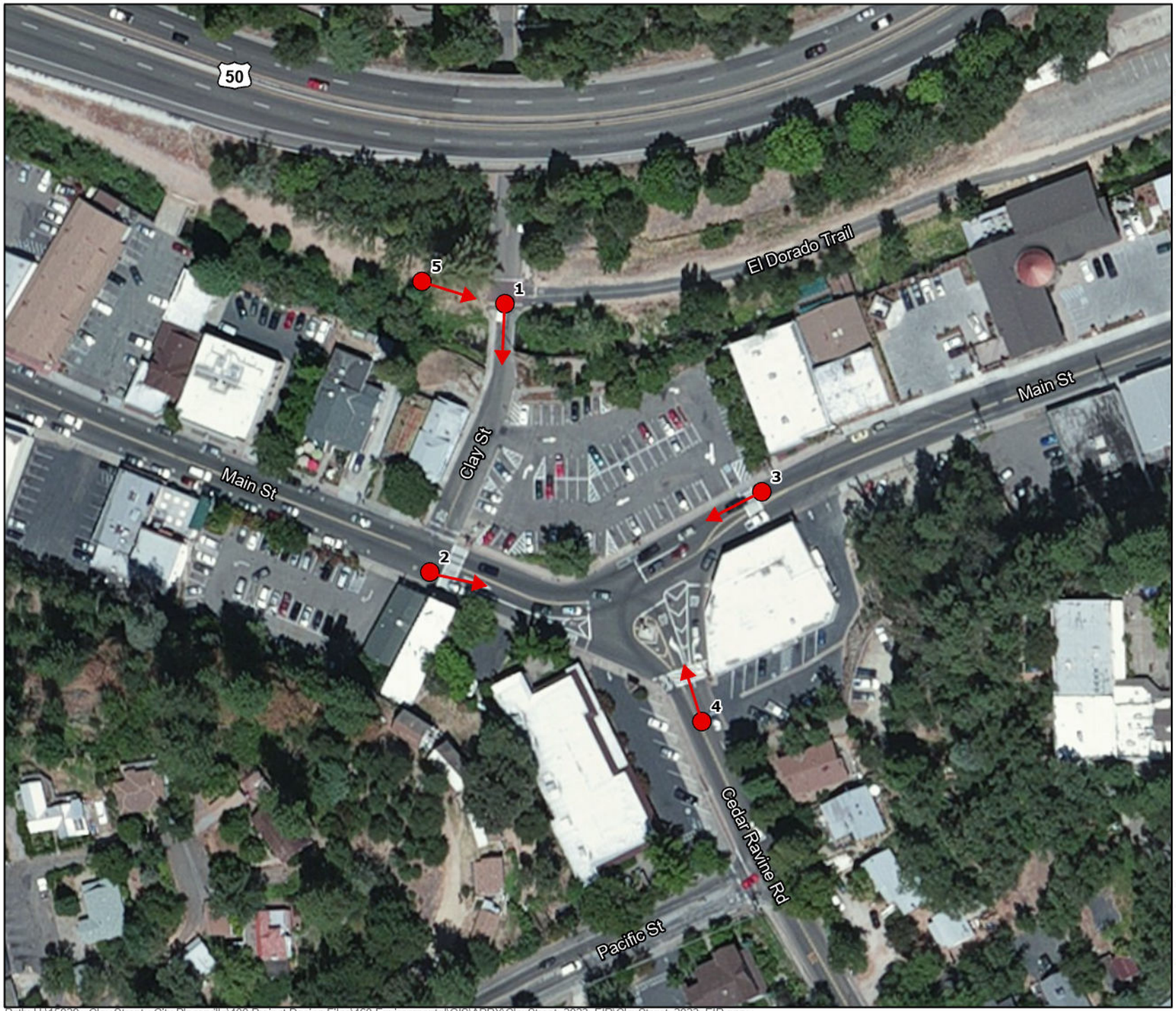
VAU1 is located in the City at the Clay Street Bridge and intersection of Main Street and Cedar Ravine Road. It is characterized as an urban-hardscape visual environment set in an adjacent backdrop comprised of low-rise modern- and historic-era single and two-story structures of varying architectural styles. Steep, hilly terrain on the south and the US 50 overcrossing and steep terrain to the north limit the overall local viewshed. The dominant human-made features found in VAU1 are the commercial structures, historic J. Pearson Soda Works Building (549 Main Street), Druid Monument. Hardscape, including the existing roads, parking lots and bicycle paths dominate the VAU. The following visual amenities are within VAU1: the Druid Monument, the Ivy House parking lot, Main Street, Cedar Ravine Road, Clay Street, the Clay Street Bridge, US 50, the El Dorado Trail, and riparian areas along Hangtown Creek.

KEY VIEWS

Within VAU1 there are five key views. See **Figure 4.1-1** for VAU1 in the proposed project corridor and the associated five key views (KV).

Key View 1: KV 1 faces southbound Clay Street at the intersection with the El Dorado Trail. The existing visual quality of this key view is moderately high. Although visually intrusive, the existing Clay Street Bridge provides a unifying element that connects rather than separates the soft greenery of the Hangtown Creek riparian vegetation and the commercial mature landscaping of the varying earth tones of the adjacent commercial structures at the Clay Street/Main Street intersection. The Ivy House parking lot and overhead utilities are visibly intrusive against the foreground of Hangtown Creek; however, this is a typical representation of the downtown edge area. The existing bridge provides a frame that increases the unity, intactness, and vividness of KV 1.

Key Views Map



Clay Street Bridge Replacement Project

Figure 4.1-1

Legend

- Key View Points

0 100 Feet

N

Author: I. Ciraulo
Last updated on Friday, November 3, 2023

Dewberry

Path: U:\15029 - Clay Street - City Placerville\400 Project Design Files\460 Environmental\GIS\APRX\ClayStreet_2023_EIR\ClayStreet_2023_EIR.aprx

Key View 2: KV 2 depicts eastbound Main Street at the interstation of Main Street/Clay Street, with views toward Main Street/Cedar Ravine Road. The existing visual quality of this key view is moderate. The grays of Main Street and the Ivy House parking lot are offset by the greens of the mature landscape trees along Main Street and the varying earth tone colorings of the adjacent residential and commercial structures, thus providing a soft, irregular, and complex visual texture. KV 2 has a focus along Main Street with crosswalks and sidewalks, guiding the viewer to a focal point in the background dominated by the Druid Monument and commercial structure. The intrusion of the commercial buildings and parking lot mark a termination to the historic downtown core. The mature landscaping in the background creates a visual departure from the roadways, commercial structure, and the Druid Monument. While the Druid Monument and Historic Soda Works building create a moderate to high level of vividness, the commercial building and parking lot distract from the historic structures, providing moderate unity and low intactness of the view.

Key View 3: KV 3 is westbound on Main Street facing towards the Main Street/Cedar Ravine Road intersection. The existing visual quality of KV 3 is moderate. The roadway, commercial parking lot, commercial building, and Ivy House parking lot all contribute and dominate the view with gray coloring as well as a hard and smooth surface that is visually balanced with the overarching greenery of the mature trees in the background. The Druid Monument, which is off-center in this view, adds asymmetry and complexity; however, from this view the historic structure seems separated from the historic downtown. The prominence of the Druid Monument and the balance of the trees contribute to the moderate unity and vividness of the site, but the contrast of the commercial building creates some disunity to the view.

Key View 4: KV 4 is northbound on Cedar Ravine Road depicting the intersection of Main Street/Cedar Ravine Road. The existing visual quality of KV 4 is moderately low. The unity, intactness, and vividness of this view are diminished by the asymmetrical juxtaposition of the size and shape of the commercial structure and the Druid Monument on the left (west) of the intersection. This contrast also gives a more rectangular and rigid feel than the other KVs. However, the mature landscaping in the background creates a visual departure from the roadways, commercial structure, and the Druid Monument.

Key View 5: KV 5 faces eastbound along El Dorado Trial, with direct views of the side of Clay Street Bridge in the middleground. The existing visual quality of this view is moderate. The unity and intactness of the vegetation and creek, combined with the El Dorado Trail, come together to from a moderately cohesive riparian landscape in the background. Views of Hangtown Creek itself, do not exhibit special visual qualities and detract from the unity of the view. The creek bank and bed included an assortment of concrete walls, sewer and utility lines and access points, and natural bank. The Clay Street Bridge provides a memorable visual feature drawing together the El Dorado Trail and the historic downtown. The background contains views of the built environment, with the Ivy House parking lot and commercial structures; however, these features are subordinate to the overall KV.

DEFINITION OF VISUAL IMPACT LEVELS

Low - Low negative change to existing visual resources, and low viewer response to that change. May or may not require mitigation.

Moderately Low – Low negative change to the visual resource with a moderate viewer response, or moderate negative change to the resource with a low viewer response. Impact can be mitigated using conventional practices.

Moderate - Moderate negative change to the visual resource with moderate viewer response. Impact can be mitigated within five years using conventional practices.

Moderately High - Moderate negative visual resource change with high viewer response or high negative visual resource change with moderate viewer response. Extraordinary mitigation practices may be required. Landscape treatment required would generally take longer than five years to mitigate.

High - A high level of negative change to the resource or a high level of viewer response to visual change such that extraordinary architectural design and landscape treatment may not mitigate the impacts below a high level. An alternative project design may be required to avoid high negative impacts.

4.1.4.2 Thresholds

Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects associated with aesthetics. The following threshold questions are used to evaluate the impacts on aesthetics. The following threshold questions are used to evaluate the impacts on aesthetics as established in the Initial Study/Notice of Preparation (IS/NOP) for the proposed project (2014)

a) Have a substantial adverse effect on a scenic vista?

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

4.1.5 Project Impacts

Threshold a. Would the proposed project have a substantial adverse effect on a scenic vista?

A scenic vista is a view that possesses visual and aesthetic qualities of high value to the community. Scenic vistas can provide views of natural features or significant structures; additionally, they may be officially recognized or designated, or they may be informal in nature (e.g., mountain peaks, expansive views). A scenic vista is

typically defined as a panoramic view or vista from an identified view/vista point, public road, public trails, public recreational areas, or scenic highways.

The vicinity of the proposed project is a commercial area, on the edge of historic downtown, containing buildings, structures, roadways, and parking lots. The proposed project site, which consists of roadways, a bridge, a parking lot, and scattered vegetation, does not exhibit characteristics that would be considered remarkable or indigenous. The proposed project site or vicinity do not contain areas considered to be scenic vistas, and public views are limited to the immediate downtown area, and the impact level is less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE

Impacts regarding scenic vistas were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold b. Would the proposed project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The proposed project is located adjacent to the US 50, is part of the Interstate Highway System and runs west to east, traversing the counties of Sacramento and El Dorado to the Nevada state line within California. US 50 from the eastern end of the government center in Placerville to Echo Summit was designated as a State Scenic Highway in 1985 (Caltrans 2023). The US 50 overcrossing at Clay Street is located within the northern boundary of the proposed project site. The nearest highway on-ramp is located approximately 0.20 miles west of the proposed project, at Bedford Avenue.

The proposed project does not include any changes to or on the US 50 overcrossing. Existing trees are located within the Caltrans right-of-way; these trees provide a partial screen for US 50 viewers and would not be removed as part of the proposed project. Westbound US 50 users do not have direct views of the proposed project and eastbound US 50 users have obstructed views of the proposed project area. These views are not direct and the travelers on US 50 do not have extended exposure to the proposed project site because of speed of travel and curvature and elevation of US 50 at the overcrossing of Clay Street. Other local scenic resources, such as Hangtown Creek, the Clay Street Bridge, and historic buildings along Main Street, are not visible or are obstructed from view for US 50 users. Eastbound roadway users would not experience a substantial change in their views as a result of the proposed project.

The proposed project would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within, or adjacent to, a state scenic highway. The assumed eligible Placerville Main Street Historic District, including the Druid Monument and the historic buildings located west of the proposed Main Street/Clay Street/Cedar Ravine Road intersection are located outside of the state scenic highway, are not visible from US 50, and would not be altered by the proposed project. While the Druid Monument would be moved approximately 45 feet west, view of this monument would not be available to US 50 users. The presence of trees obstructs direct views from US 50 towards the proposed project area. Approximately 20 trees would be removed as part of the proposed project to accommodate the bridge realignment along Hangtown Creek. Tree removal would not be within the Caltrans right of way. Removed trees could potentially open up views of the site from US 50 depending on the size of the individual tree canopy; however, any trees removed within the proposed project area would be replaced at a minimum 1:1 or higher as determined by permits required by natural resource agencies (refer to **Section 4.3, Biological Resources**), and the impact level is less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE

Impacts regarding scenic resources within a state scenic highway were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold c. Would the proposed project substantially degrade the existing visual character or quality of the site and its surroundings?

The General Plan recognizes Hangtown Creek and the historic buildings within downtown Placerville as scenic resources and includes numerous policies intended to protect those resources and maintain the overall visual character of the downtown area. Within the project vicinity, the visual environment is composed of both historic and modern elements. Hangtown Creek, the Druid Monument, and the adjacent historic commercial buildings are prominent visual features that are recognizable and important elements of the visual landscape. In contrast, the project site also includes contemporary transportation infrastructure, including Main Street, Clay Street, Cedar Ravine Road, the Ivy House parking lot, and their associated intersections, which collectively define the existing transportation setting.

CONSTRUCTION

Construction activities associated with the proposed project would temporarily dominate the visual environment within VAU1, for the duration of the nine-month construction period. Visual construction effects at key views would include the visual

intrusion of construction machinery, roadway alterations, and bridge demolition and replacement. The temporary removal and storage of the Druid Monument during construction would remove a unique visual feature in the area; however, this would be temporary as the Druid Monument would be relocated within the intersection upon construction completion. Potential visual construction effects associated with the proposed project at key views would be temporary in nature and cease upon the completion of construction for the proposed project.

OPERATION

The following discussion uses key viewpoints within VAU1 to describe and illustrate potential visual impacts to visual character or quality and includes the predicted viewer response for the proposed project. The simulated views of the proposed project provided in the figures for each KV are conceptual renderings for illustrative and analysis purposes only.

- **Key View 1 - Intersection of Clay Street and the El Dorado Trail.**

  The potential visual change of KV 1 resulting from the proposed project would be moderate. **Figure 4.1-2** depicts the existing conditions and a simulated view of the proposed conditions. Approximately 20 trees would be removed as part of the proposed project to accommodate the bridge realignment along Hangtown Creek. Removed trees would open up views of the reconfigured Ivy House parking lot and the new intersection at Main Street and Cedar Ravine Road; however, any trees removed within the proposed project area would be replaced at a ratio minimum ratio of 1:1 or higher as determined by permits required by natural resource agencies (refer to **Section 4.3, Biological Resources**). The addition of a vehicular lane on the Clay Street Bridge and the realignment of Clay Street to form the Main Street/Clay Street/Cedar Ravine Road intersection would increase the prominence of the roadway as well as increase the homogeneity of the view by shifting the modern roadway away from the existing historic structures. By pulling the roadway away from the edge of the assumed eligible Placerville Main Street Historic District, the proposed project would delineate a clear boundary between modern and historic.

  The addition of sidewalks on both sides of Clay Street would improve the pedestrian and bicycle facilities. This would enhance the prominence of this pedestrian scale of KV 1. The widening of the Clay Street Bridge to accommodate two-lanes would increase the scale visually for pedestrians and drivers.



Key View 1: Existing Condition – Clay Street looking south.



Key View 1: Proposed Condition – Clay Street looking south.

Clay Street Bridge Replacement Project

Existing & Proposed Renderings (October 27, 2023)

Dewberry

Figure 4.1-2

- **Key View 2 – Intersection of Clay Street and Main Street**

The potential visual change of KV 2 resulting from the proposed project would be low. **Figure 4.1-3** shows the existing conditions and a simulation of the proposed conditions. Realignment of Clay Street and the resulting Main Street/Clay Street/Cedar Ravine Road intersection would increase the fluidity of the view. Unity and continuity of this view would remain very similar to existing conditions because no buildings would be removed and the main pattern elements, such as sidewalk, roadway, and landscaping, would remain in place. The cork oak tree located at the Ivy House parking lot would remain in place, and the Druid Monument would remain in the intersection, although off-set from its original location by 45 feet.

- **Key View 3 – East of the intersection of Main Street and Cedar Ravine Road**

The potential visual change of KV 3 resulting from the proposed project would be moderately low. **Figure 4.1-4** shows the existing conditions and a simulated view of the proposed conditions. The Main Street/Clay Street/Cedar Ravine Road intersection realignment would relocate the Druid Monument to a concrete island, improving its prominence and visibility for drivers, bicyclists, and pedestrians. At the same time, movement of the monument would limit the asymmetrical separation and tether older historic elements of the eastern boundary of the assumed eligible Placerville Main Street Historic District, thereby increasing its vividness as well as unity and intactness. The relocated Druid Monument would serve as a boundary marker between modern and historic elements in the downtown Placerville core. It is expected that the relocation of the monument at a slightly higher elevation would improve the visual continuity of the roadway. The visual balance of the roadway, the Druid Monument, and the adjacent modern commercial structures would be improved as compared to the existing conditions.

- **Key View 4 – South of the intersection of Main Street along Cedar Ravine Road**

The potential visual change of KV 4 resulting from the proposed project would be moderately low. **Figure 4.1-5** shows the existing conditions and a simulation of the proposed conditions. Realignment Clay Street to form the Main Street/Clay Street/Cedar Ravine Road intersection would slightly increase the fluidity of the view and slightly decrease the prominence of the greens and earth tones of the hardwood trees by increasing the prominence of grays and monotones on the roadways and Ivy House parking lot. The replacement bridge and realignment of the intersection would provide a direct sightline to mature trees that are valued by the community such as the large redwood tree near Hangtown Creek and cork oak tree at the Ivy House parking lot. Approximately 20 trees would be removed as part of the proposed project to accommodate the bridge realignment along Hangtown



Key View 2: Existing Condition – Main Street looking east.



Key View 2: Proposed Condition – Main Street looking east.

Clay Street Bridge Replacement Project

Representative photos (October 27, 2023)

Dewberry

Figure 4.1-3



Key View 3: Existing Condition – Main Street looking west.



Key View 3: Proposed Condition – Main Street looking west.

Clay Street Bridge Replacement Project

Representative photos (October 27, 2023)

Dewberry

Figure 4.1-4



Key View 4: Existing Condition – Cedar Ravine Road looking north.



Key View 4: Proposed Condition – Cedar Ravine Road looking north.

Creek. Tree removal would not be within the Caltrans right of way. Removed trees could potentially open up views of the site from US 50 depending on the size of the individual tree canopy; however, any trees removed within the proposed project area would be replaced at a minimum 1:1 ratio or higher as determined by permits required by natural resource agencies (refer to **Section 4.3, Biological Resources**). The proposed intersection would shift the Druid Monument from a central focus to a peripheral focus for KV 4, thereby increasing the unity and intactness, but decreasing vividness. As such, the relocated Druid Monument serves as a distinct boundary marker between modern and historic elements in the downtown Placerville core.

- **Key View 5 – West of the Clay Street Bridge along the El Dorado Trail**

The potential visual change of KV 5 resulting from the proposed project would be moderate. **Figure 4.1-6** shows the existing conditions and a simulated view of the proposed conditions. The addition of a vehicular lane and realignment of the Clay Street Bridge would slightly increase the prominence of the roadway, as well as, increase the homogeneity of KV 5 by shifting the modern roadway away from the existing historic structures. Approximately 20 trees would be removed as part of the proposed project to accommodate the bridge realignment along Hangtown Creek. Tree removal would not be within the Caltrans right of way. Removed trees would not open views from this KV to US 50. Additionally, any trees removed within the proposed project area would be replaced at a minimum 1:1 or higher as determined by permits required by natural resource agencies (refer to **Section 4.3, Biological Resources**).

The removal of the existing Clay Street Bridge footing and arch from the creek opens the views and symmetry of Hangtown Creek for El Dorado Trail users. The proposed bridge footings and new retaining wall formline, pattern, and color would mimic the existing sections of the Hangtown Creek retaining walls, thereby, tying the new construction into the existing environment. The proposed bridge railing would be a height that meets current safety and design standards and the proposed see-through style would not increase the dominance of the railings or block existing views for trail users.

The addition of sidewalks and lighting on both sides of Clay Street would improve the pedestrian and bicycle facilities. This would enhance the prominence and safety of this pedestrian scale of KV 5. The widening of the Clay Street Bridge to accommodate two-lanes would increase the scale visually from pedestrians to drivers.

The visual resource change in VAU 1 can be seen in **Figure 4.1-6** that reflects the existing and a simulated aerial view of the proposed conditions. Overall, Visual change resulting from the proposed project is expected to be moderate. Proposed improvements would be consistent with the local regulatory framework, and changes



Key View 5: Existing Condition – El Dorado Bike Path looking southeast.



Key View 5: Proposed Condition – El Dorado Bike Path looking east.

Clay Street Bridge Replacement Project

Representative photos (October 27, 2023)

Dewberry

Figure 4.1-6



VAU 1 Existing Aerial looking north



VAU 1 Proposed Aerial looking north

Clay Street Bridge Replacement Project

Representative photos (January 23, 2024)

Dewberry

Figure 4.1-7

to the visual character and quality within the proposed project area is expected to have moderately low negative change to the visual resources. The main pattern elements would remain in the proposed project area, including urban commercial structures east and south of the intersection, greys and hard/smooth surfaces of the intersection and parking lot, and historic buildings and features west of the intersection. The existing and proposed bridge and intersection are similar in the amounts of hardscape, similar in scale, and similar in dominance. Because the proposed project area is highly frequented by the community and tourists alike, a high to moderate viewer response by roadway users and neighbors would be expected due to the change of a three-way (triangular) intersection to four-way (square) interchange and movement of a prominent cultural icon (the Druid Monument). This change is considered potentially significant.

MITIGATION MEASURES

Mitigation Measure AES-1: The specific aesthetic treatments, details, color pallets and material selections will be considered for the proposed project during the PS&E stage. These elements would be presented and discussed at a public meeting prior to finalization, providing the public with an opportunity to review and comment on proposed architectural treatments before they are incorporated into the final construction documents. After the meeting, the project shall incorporate the following streetscape and landscape design concepts::

- Low planter walls shall be placed along the Main Street and Clay Street edges of the reconfigured Ivy House parking lot in the same style as other surrounding rock wall features and to offer informal and temporary seating opportunities.
- Tree species as identified in Appendix A of the Main Street Streetscape Design Development Plan (incense cedar, tulip tree, valley oak, red oak, and Chinese pistache) shall be planted along Main Street in areas where ample room is supplied to define public space along the street and adjacent to parking lots to provide shade.
- Accent planting in large planting beds shall be provided adjacent to the reconfigured Ivy House parking lot.
- New streetlights installed as part of the project shall have light poles consistent with existing types along Main Street and must meet applicable energy standards and City lighting specifications for safety of public roadways as set forth in Chapter XII, Section B, of the City's Development Guide.
- .

Timing/Implementation: *Prior to final design approval*

Enforcement/Monitoring: *City of Placerville, Engineering Department*

Mitigation Measure AES-2: The project shall incorporate the following measures to protect natural features appreciated by the public for their history and character:

- The cork oak tree shall be protected in place by establishing a tree protection zone (TPZ) and by implementing requirements for a TPZ set forth in **Mitigation Measure BIO-3** and any other necessary measures, as determined by an ISA-certified arborist, to protect the cork oak during construction.
- The redwood tree at the northwest corner of the Clay Street Bridge shall be evaluated by an ISA-certified arborist to determine the tree's health. If it is determined the tree will not pose a hazard and can remain in place, the tree shall be protected in place by establishing a TPZ and by implementing requirements for a TPZ set forth in **Mitigation Measure BIO-3** and any other necessary measures, as determined by an ISA-certified arborist, to protect the redwood tree during construction.

Timing/Implementation:	*Prior to and incorporate into final design approval*
Enforcement/Monitoring:	*City of Placerville, Engineering Department*

Mitigation Measure AES-3: The project shall incorporate the following measures to address impacts associated with the loss of vegetation and trees:

- Vegetation clearing will only occur within the delineated project boundaries and as necessary to construct the project. Trees located in areas along the edge of the construction zone will be trimmed, and only those trees that lie within the active construction areas and cannot be avoided will be removed. Replacement of removed trees within the active construction area will be replaced at a 1:1 ratio unless the natural resource agencies with permitting authority over the project require a higher ratio.

Timing/Implementation:	*During and After construction activities*
Enforcement/Monitoring:	*City of Placerville, Engineering Department*

Additionally, implement **Mitigation Measures CUL-1** through **CUL-3**.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding visual character and quality were determined to be **potentially significant** without mitigation. Therefore, mitigation measures were required or included, and the impact level would be **less than significant with mitigation**.

Threshold d. Would the proposed project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The proposed project would install new streetlights along both sides of the new bridge. Additional lighting at the new bridge would be consistent with the acorn-style lighting along Main Street. The additional lighting would make the corridor safer for bicyclists and pedestrians using the bridge to pass along Clay Street between the El Dorado Trail and Main Street. The proposed continuous lighting would create increased visibility and a safer more consistent sidewalk and bicycle facility. However, implementation of the proposed lighting improvements at the new bridge would not substantially increase neighboring properties' exposure to light or glare. Therefore, there would be no substantial increase in lighting or glare that could affect day or nighttime views of the area, and the impact level is less than significant. .

If construction occurs after daylight hours, construction equipment that requires lighting could result in temporary increase to nighttime light and glare. The proposed project would incorporate construction lighting types, plans, and placement would comply with State and local standards to minimize construction-related light and glare impacts on surrounding sensitive uses.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding light and glare were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

4.1.6 Cumulative Impacts

Under cumulative conditions, visual effects could occur as a result of increased urbanization, the loss of open space, the loss of trees, obstructions to views of ridgelines and hillsides, and increased light and glare in the City and surrounding areas. **Section 3.6, Cumulative Projects, Table 3.6-1** provides a list of past, present, and reasonably foreseeable future projects that are considered as part of the cumulative impact analysis within this EIR and are within the City limits. The identified projects would be, or have been, evaluated on a project-by-project basis and are subject to similar stipulations as those required for the proposed project.

The proposed project is in a built-out location that is surrounded by existing commercial development in an established area. While the proposed project would result in changes to the existing visual character of the area, the proposed project site is not visible from areas beyond those immediately adjacent to the site (i.e., Main Street, Clay Street, Cedar Ravine Road, the Ivy House parking lot, and El Dorado

Trail), and the proposed project would not result in visual affects beyond the proposed project site itself.

The proposed project's mitigation measures and aesthetic design features would be compatible with the surrounding area, including historic downtown. There would be no substantial increase in lighting or source of glare. The proposed project would not combine with other projects within the City to significantly alter the visual character and quality of the City. The proposed project would not directly or indirectly cause additional growth and development in the City of Placerville or the surrounding areas of El Dorado County that could lead to cumulative visual/aesthetic impacts.

4.2 Air Quality

4.2.1 Introduction

This section of the Recirculated Environmental Impact Report (REIR) addresses potential impacts of the Clay Street Bridge Replacement Project (proposed project) on air quality. This section includes a summary of applicable regulations, a description of existing air quality conditions, and an analysis of potential air quality impacts associated with the proposed project. Potential impacts on the environment and human health due to emissions affecting air quality during construction and operation of the project are discussed using applicable thresholds where indicated. Mitigation Measures that would reduce impacts, where applicable, are also discussed. The proposed project's contribution to greenhouse gas emissions is evaluated in **Section 4.5**.

4.2.2 Environmental Setting

California is currently divided into 15 air basins. Air basin boundaries are generally defined along political boundary lines and include both the source and receptor areas. The proposed project lies within the Mountain Counties Air Basin (MCAB). The MCAB encompasses El Dorado (western Portion), Plumas, Sierra, Nevada, Placer (Middle Portion), Amador, Calaveras, Tuolumne, and Mariposa counties. The basin lies along the northern portion of the Sierra Nevada mountain range, close to or contiguous with the Nevada border, and covers an area of roughly 11,000 square miles. Elevations range from over 10,000 feet at the crest of the Sierra Nevada mountain range down to several hundred feet above mean sea level at the Sacramento County boundary. The MCAB is subject to a combination of topographical and climatic factors that can influence regional and local air quality.

The proposed project area is under the El Dorado County Air Quality Management District (EDCAQMD) jurisdiction. Air quality districts are public health agencies whose mission is to improve the health and quality of life for residents through effective air quality management strategies. The EDCAQMD prepares regional strategies to attain and maintain air quality conditions though a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues.

4.2.2.1 Meteorological Conditions

The MCAB's general climate varies considerably with elevation. Terrain features make it possible for various climates to exist in relatively close proximity. The pattern of mountains and hills causes a wide variation in rainfall amounts, temperature, and localized winds throughout the MCAB. The Sierra Nevada mountain range receives large amounts of precipitation from storms moving in from the Pacific Ocean in the winter, with lighter amounts from intermittent "monsoonal" moisture flows from the south and cumulus buildup in the summer. Precipitation levels are high in the highest

mountain elevations but decline rapidly toward the western portion of the MCAB. Winter temperatures in the mountains can be below freezing for weeks at a time, and substantial amounts of snow can accumulate; however, in the western foothills, where the City of Placerville (City) is located, winter temperatures usually dip below freezing only at night and precipitation is mixed as rain or light snow. In the summer, temperatures in the mountains are mild, with daytime peaks in the 70s to low 80s (degrees Fahrenheit), while the western end of El Dorado County (County), including the proposed project, can routinely exceed 100 degrees.

The topography and meteorology of the MCAB combine such that local conditions predominate in determining the effect of emissions in the MCAB. Regional airflows are affected by the mountains and foothills, which direct surface air flows, cause shallow vertical mixing, and create areas of high pollutant concentrations by hindering dispersion. Inversion layers, where warm air overlays cooler air, frequently occur and trap pollutants close to the ground. In the winter, these conditions can lead to carbon monoxide “hot spots” along heavily traveled roadways and at busy intersections. During summer’s longer daylight hours, stagnant air, high temperatures, and plentiful sunshine provide the conditions and energy for the photochemical reaction between reactive organic gas (ROG) and oxides of nitrogen (NOx) that results in the formation of O_3 of its long formation time, O_3 is a regional pollutant rather than a local problem.

In the summer, the strong upwind valley air flowing into the MCAB from the Central Valley, located to the west, is an effective transport medium for ozone precursors generated in the San Francisco Bay Area (Bay Area) and the Sacramento and San Joaquin valleys. These transported pollutants predominate as the cause of O_3 in the MCAB and are largely responsible for the exceedances of State and federal O_3 ambient air quality standards in the MCAB. The California Air Resources Board (CARB) has officially designated MCAB as “ozone impacted” by transport from those areas (13 California Code of Regulations [CCR] 70500) (EDCAQMD 2002).

4.2.2.2 Existing Air Quality

Existing air quality conditions in the project area can be characterized according to the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for the various pollutants and data collected in the region. Monitored data concentrations are typically expressed in terms of parts per million (ppm) or micrograms per cubic meter (µg/m3) (**Table 4.2-1**). In the County, there are three monitoring stations that record O3 levels and one station that records particulate matter 10 microns or less in diameter (PM10) levels. No monitoring stations in the County collect data on carbon monoxide (CO), particulate matter 2.5 microns or less in diameter (PM2.5), or nitrogen dioxide (NO2). The closest O3 monitoring station is the Placerville/Gold Nugget Way station. The PM10 monitoring station is in the Lake Tahoe Air Basin portion of the County. Because distinct meteorological conditions can influence PM10 and PM2.5, data for PM10 from the Sacramento-Branch Center Road monitoring station and data for PM2.5 from the Folsom-Natoma Street Station, both in

Sacramento County, are considered representative for the proposed project site. The Sacramento-Branch Center Road monitoring station is approximately 30 miles west of the City; the Folsom-Natoma Street Station is approximately 20 miles west of the City.

TABLE 4.2.1 AMBIENT AIR QUALITY MONITORING DATA (PLACERVILLE-GOLD NUGGET WAY, SACRAMENTO-BRANCH CENTER ROAD, AND FOLSOM-NATOMA STREET)

POLLUTANT	STANDARD	2017	2018	2019	2020	2021	2022
Ozone (O3) from the Placerville-Gold Nugget Way Station							
Max 1-hr concentration		0.104	0.115	0.081	0.127	0.090	0.062
No. days exceeded: State	0.08 ppm	1	8	0	4	0	0
Max 8-hr concentration		0.084	0.099	0.075	0.101	0.080	0.056
No. days exceeded: State Federal	0.070 ppm 0.070 ppm	21 18	31 28	4 4	20 20	10 10	0 0
PM10 from the Sacramento-Branch Center Road #2 Station							
Max 24-hr concentration		81	212	55	203	58	54
No. days exceeded: State Federal	50 µg/m3 150 µg/m3	18.4 0.0	24.1 6.1	* *	* 7.7	25.4 0.0	6.0 0.0
Annual average concentration (mg/m3)		21.3	27.4	*	*	24.8	24.8
No. days exceeded: State	20 µg/m3	*	*	*	*	*	*
PM2.5 from the Folsom-Natoma Street Station							
Max 24-hr concentration		36.7	104.5	25.4	21.5	265.7	73.5
No. days exceeded: State	35 µg/m3	0.0	9.0	*	*	10.0	2.0
Annual average concentration (mg/m3)		7.6	10.2	*	*	9.3	7.3
No. days exceeded: State Federal	12.0 µg/m3 15.0 µg/m3	8 7.4	10 8	10 *	10 *	9 *	9 *

* Means there was insufficient data available to determine the value

Source: CARB 2016

4.2.2.3 Criteria Air Pollutants

The federal Clean Air Act (CAA) requires the U.S. Environmental Protection Agency (USEPA) to set NAAQS for major pollutants that could be detrimental to the environment and human health. The CAAQS are the California equivalent of the

NAAQS. An air basin is in “attainment” (compliance) when the levels of the pollutant in that air basin are below NAAQS and CAAQS thresholds. **Table 4.2-2** provides information on the NAAQS and **Table 4.2-3** provides information on the CAAQS.

TABLE 4.2.2 NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS)

POLLUTANT		STANDARD TYPE	AVERAGING TIME	CONCENTRATION THRESHOLD	FORM
Carbon monoxide (CO)		Primary	8 hours	9 ppm	Not to be exceeded more than once per year
			1 hour	35 ppm	
Lead (Pb)		Primary and secondary	Rolling 3-month average	0.15 µg/m3	Not to be exceeded
Nitrogen dioxide (NO2)		Primary	1 hour	100 ppb	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
		Primary and secondary	1 year	53 ppb	Annual mean
Ozone (O2)		Primary and secondary	8 hours	0.070 ppm	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years
Particulate matter (PM)	PM2.5	Primary	1 year	12.0 µg/m3	Annual mean, averaged over 3 years
		Secondary	1 year	15.0 µg/m3	Annual mean, averaged over 3 years
		Primary and secondary	24 hours	35 µg/m3	98th percentile, averaged over 3 years
	PM10	Primary and secondary	24 hours	150 µg/m3	Not to be exceeded more than once per year on average over 3 years
Sulfur dioxide (SO2)		Primary	1 hour	75 ppb	99th percentile of 1 hour daily maximum concentrations, averaged over 3 years

TABLE 4.2.2 NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS)				
POLLUTANT	**STANDARD TYPE**	**AVERAGING TIME**	**CONCENTRATION THRESHOLD**	**FORM**
	Secondary	3 hours	0.5 ppm	Not to be exceeded more than once per year

Source: USEPA 2023

TABLE 4.2.3 THE CALIFORNIA AMBIENT AIR QUALITY STANDARDS (CAAQS)			
POLLUTANT		**AVERAGING TIME**	**CONCENTRATION THRESHOLD**
Carbon monoxide (CO)		8 hours	0.09 ppm
		1 hour	0.070 ppm
Lead (Pb)		1.5	0.15 µg/m3
Nitrogen dioxide (NO2)		1 hour	0.18 ppm
		Annual arithmetic mean	0.030 ppm
Ozone (O2)		8 hours	0.09 ppm
		1 hour	0.070 ppm
Particulate matter (PM)	PM2.5	Annual arithmetic mean	12.0 µg/m3
	PM10	24 hours	50 µg/m3
		Annual arithmetic mean	20 µg/m3
Sulfur dioxide (SO2)		1 hour	0.25 ppm
		24 hours	0.04 ppm
Visibility reducing particles		9 hours	Extinction of 0.23 per kilometer
Sulfates		24 hours	25 µg/m3
Hydrogen sulfide (H2S)		1 hour	0.03 ppm
Vinyl chloride		24 hours	0.01 ppm

Source: CARB 2016

The most current attainment designations for the MCAB portion of the County are shown in **Table 4.2-4**.

TABLE 4.2.4 AIR QUALITY ATTAINMENT STATUS DESIGNATIONS – MOUNTAINS COUNTIES AIR BASIN PORTION OF EL DORADO COUNTY		
POLLUTANT	**FEDERAL STANDARD**	**STATE STANDARD**
Ozone (8-Hour Standard)	Nonattainment (Severe)	Nonattainment
Carbon Monoxide	Unclassified/Attainment	Unclassified

TABLE 4.2.4 AIR QUALITY ATTAINMENT STATUS DESIGNATIONS – MOUNTAINS COUNTIES AIR BASIN PORTION OF EL DORADO COUNTY		
POLLUTANT	**FEDERAL STANDARD**	**STATE STANDARD**
Nitrogen Dioxide	Unclassified/Attainment	Attainment
Sulfur Dioxide	Unclassified/Attainment	Attainment
Sulfates	No Federal Status	Attainment
Lead	Unclassified/Attainment	Attainment
Hydrogen Sulfide (H2S)	No Federal Status	Unclassified
Particulate Matter (PM10)	Nonattainment	Nonattainment
Fine Particulate Matter (PM2.5)	Nonattainment (Severe)	Unclassified
Visibility Reducing Particles	No Federal Standard	Unclassified

Source: CARB 2022

4.2.2.4 Sensitive Receptors

One of the most important reasons for air quality standards is the protection of those members of the population who are most sensitive to the adverse health effects of air pollution, termed “sensitive receptors”.

EDCAQMD defines a sensitive receptor as facilities that house or attract children, the elderly, people with illnesses or others who are especially sensitive to the effects of air pollutants, such as hospitals, schools, and convalescent facilities (EDCAQMD 2002). Residential areas are considered sensitive to air pollution because residents, including children and the elderly, tend to be at home for extended periods of time, resulting in sustained exposure to pollutants.

The existing land uses surrounding the proposed project site include a mixture of commercial and residential (**Figure 4.2-1)**. The nearest sensitive residential receptors are located adjacent to Cedar Ravine Road between Pacific Street and Thompson Way (adjacent to the proposed project site), as well as north of US 50. The nearest school is the Sierra Elementary School located approximately 1,000 feet east of the proposed project. The Marshall Medical Center and Marshall Emergency Department are located approximately 2,000 feet southeast of the proposed project.

Sensitive Receptors



Clay Street Bridge Replacement Project

Figure 4.2-1

Legend

- Proposed Project Area
- Quarter-Mile Buffer
- Hospitals & Convalescent Hospitals
- Multi-Residential 2-3 Units
- Multi-Residential 4+ Units
- Retirement Housing
- Rural Residential
- Single Family Residential
- Placerville Elementary School District

N

0 600 US Feet

Author: I. Ciraulo
Last updated on Friday, November 3, 2023

Dewberry

Path: U:\15029 - Clay Street - City Placerville\400 Project Design Files\460 Environmental\GIS\APRX\ClayStreet_2023_EIR\ClayStreet_2023_EIR.aprx

4.2.2.5 Naturally Occurring Asbestos

Naturally occurring asbestos (NOA) is a fibrous material found in certain types of rock formations. Asbestos becomes a human health hazard when it becomes airborne. It is classified as a known human carcinogen by federal, State, and international agencies and is identified as a toxic air contaminant (TAC).

NOA is the result of natural geologic processes and is commonly found near earthquake faults in California. NOA can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. NOA may be released into the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos-bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. Serpentinite may contain chrysotile asbestos, especially near fault zones. Ultramafic rock, a rock closely related to serpentinite, may also contain asbestos materials.

As reported in the map of Asbestos Review Areas, Western Slope, County of El Dorado, State of California, there is no significant occurrence of ultramafic rock where NOA is likely to occur in the proposed project area. However, the entire proposed project area is located in a buffer zone identifying the potential for NOA resulting from a north-south-trending fault that crosses Bedford Avenue and Main Street in the western portion of the proposed project area, indicating that NOA could potentially occur in the area (El Dorado County 2018).

4.2.3 Regulatory Setting

4.2.3.1 Federal

FEDERAL CLEAN AIR ACT

The Federal Clean Air Act (FCAA), as amended, is the primary federal law that governs air quality while the California Clean Air Act (CCAA) is its companion state law. These laws, and related regulations by the USEPA set standards for the concentration of pollutants in the air. NAAQS have been established for six criteria pollutants that have been linked to potential health concerns: CO, NO_2, O_3, PM_{10}, $PM_{2.5}$, Lead (Pb), and sulfur dioxide (SO_2). The NAAQS are set at levels that protect public health with a margin of safety, and are subject to periodic review and revision. Federal regulatory schemes also cover TACs; some criteria pollutants are also TACs or may include certain TACs in their general definition.

4.2.4 State Plans, Policies and Regulations

CALIFORNIA AIR RESOURCES BOARD (CARB)

The CARB, a department of the California Environmental Protection Agency, oversees air quality planning and control throughout California by administering the State implementation Plan (SIP). Its primary responsibility lies in ensuring implementation of the 1989 amendments to the California Clean Air Act (CCAA), responding to the federal CAA requirements and regulating emissions from motor vehicles sold in California. It also sets fuel specifications to further reduce vehicular emissions. The amendments to the CCAA establish CAAQS, and a legal mandate to achieve these standards by the earliest practical date. These standards apply to the same criteria pollutants as the federal CAA, including, CO, NO2, O3, PM10, PM2.5, Pb, and SO2, and are more stringent that the NAAQS. In addition, state standards exist for visibility reducing particles, sulfates, hydrogen sulfide (H_2S), and vinyl chloride. The CAAQS, like NAAQS, are set at levels that protect public health with a margin of safety and are subject to periodic review and revision. Like the federal regulations, the state regulatory schemes also cover TACs; some criteria pollutants are also TACs or may include certain TACs in their general definition.

The Air Toxics “Hot Spots” Information and Assessment Act (Assembly Bill [AB] 2588) was enacted in 1987 as a means to establish a formal TAC emission inventory risk quantification program. AB 2588, as amended, establishes a process that requires stationary sources to report the type and quantities of certain substances their facilities routinely release into their air basin. Each air pollution control district ranks the data into high, intermediate and low priority categories. When considering the ranking, the potency, toxicity, quantity, volume and proximity of the facility to receptors are given consideration by an air district.

CARB also has on-road and off-road engine emission reduction programs that indirectly affect a project’s emissions through the phasing in of cleaner on-road and off-road equipment engines. Additionally, CARB has a Portable Equipment Registration Program that allows owners or operators of portable engines and associated equipment to register their units under a statewide portable program to operate their equipment, which must meet specified program emission requirements, throughout California without having to obtain individual permits from local air districts.

The State has also enacted a regulation for the reduction of diesel particulate matter (DPM) and criteria pollutant emissions from in-use off-road diesel-fueled vehicles (California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449). This regulation provides target emission rates for PM and NO_X emissions from owners of fleets of diesel-fueled off-road vehicles and applies to equipment fleets of three specific sizes and the target emission rates are reduced over time.

4.2.4.1 Regional Plans, Policies, and Regulations

EL DORADO COUNTY AIR QUALITY MANAGEMENT DISTRICT

The EDCAQMD seeks to improve air quality conditions in the County through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The EDCAQMD also inspects stationary sources, responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements other programs and regulations required by the federal CAA and the CCAA.

EDCAQMD rules and regulations that would apply to the proposed project are:

- Rule 202, Visible Emissions. Limits emissions that are darker in shade than No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view to a degree equal to or greater than smoke.
- Rule 205, Nuisance. Prohibits discharge of air contaminants or other material that (1) cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; (2) endanger the comfort, repose, health, or safety of any such persons or the public; or (3) cause, or have a natural tendency to cause, injury or damage to business or property.
- Rule 207, Particulate Matter. Limits particulate matter emissions in excess of 0.1 grains per cubic foot of dry exhaust gas.
- Rule 215. Architectural Coatings. Specifies volatile organic compounds (VOCs) content limits for architectural coatings applied in El Dorado County.
- Rule 223-1, Fugitive Dust. Limits fugitive dust emissions from construction and construction-related activities. The rule requires submission of a detailed Fugitive Dust Control Plan to the EDCAQMD prior to the start of any construction activity for which a grading permit was issued by El Dorado County and implementation of best management practices, which are listed in Tables 1 through 4 in the rule.
- Rule 223-2, Asbestos Hazard Mitigation. Requires an asbestos dust mitigation plan to be prepared, submitted, approved, and implemented when more than 20 cubic yards of earth will be moved at all sites identified as being in an Asbestos Review Area as shown on the El Dorado County Naturally Occurring Asbestos Review Map maintained by the EDCAQMD. Requires testing for NOA prior to construction activities in areas likely to contain NOA and implementation of best management practices to control dust during construction, which are listed in Table 1 in the rule.
- Rule 224, Cutback Asphalt Paving Material. Specifies Volatile Organic Compound (VOC) content limits for cutback asphalt.
- Rule 233, Stationary Internal Combustion Engines. Limits nitrogen oxides and carbon monoxide emissions from stationary internal combustion engines. This rule would apply to heavy equipment used during construction.

4.2.5 Methodology and Thresholds of Significance

The air quality significance criteria were developed considering the California Environmental Quality Act (CEQA) significance criteria developed by the local air quality districts in the project area, approved CEQA air quality checklists, and considering other federal criteria.

4.2.5.1 Methodology

Air quality impacts were assessed in accordance with methodologies recommended by CARB and the EDCAQMD. Since the proposed project is included in the 2023-26 Metropolitan Transportation and Improvement Program (MTIP), Amendment #2 to the Metropolitan Transportation Plan – Sustainable Communities Strategy (MTP), and accompanying Air Quality Conformity Analysis received federal approval; construction-generated criteria air pollutant emissions were modeled using the Road Construction Emissions Model Version 9.0. The Road Construction Emissions Model was developed by the Sacramento Metropolitan Air Quality Management District (SMAQMD) and can be used to determine the emission impacts of road construction projects (**Appendix D**).

The impacts of the proposed project from mobile-source criteria air pollutant emissions during the post-construction operations was evaluated based on AM and PM peak-hour vehicle traffic numbers coupled with the estimated average vehicle delay at the proposed project-affected intersections as identified in the transportation analysis report prepared for the project (Fehr & Peers 2018). Emissions were calculated by multiplying automobile-idling vehicle emissions factors generated by CARB's EMFAC2021 emission program by the number of peak-hour vehicles and by the seconds of delay experienced per vehicle, both identified in the transportation analysis report (Fehr & Peers 2018). The average daily traffic (ADT) volume through each intersection and average daily delay times are not known; however, a conservative estimate was made of the ADT (and the resulting criteria air pollutant and O3 precursor emissions) by multiplying the peak hour data by 10 to obtain pounds per day of emissions (**Appendix D**).

4.2.5.2 Thresholds

Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects associated with air quality. The following threshold questions are used to evaluate the impacts on air quality:

a) Conflict with or obstruct implementation of the applicable air quality plan?

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state

ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

d) Expose sensitive receptors to substantial pollutant concentrations?

e) Create objectionable odors affecting a substantial number of people?

The EDCAQMD has published a guidance document for the preparation of the air quality portions of environmental documents that includes thresholds of significance. The following thresholds are recommended.

- **Short-term emissions of ozone-precursor pollutants.** The EDCAQMD considers combined increases in ozone-precursor emissions of ROG and NOx greater than 164 pounds per day (lbs/day) (i.e., 82 lbs/day/pollutant) as significant during project construction activities.
- **Long-term emissions of ozone-precursor pollutants.** The EDCAQMD has determined that mass emissions in excess of 82 lbs/day for each of the ozone-precursor pollutants (i.e., ROG and NOx) could affect the EDCAQMD's commitment to attain the federal 1-hour ozone standard in the Sacramento region and thus could have a significant adverse impact on air quality.
- **Long-term increases in localized pollutant emissions.** For the other criteria pollutants, including CO, PM_{10}, SO_2, NO_2, sulfates, Pb, and H_2S, a project is considered to have a significant impact on air quality if it will cause or contribute significantly to a violation of the applicable NAAQS or CAAQS (**Table 4.2-2** and **Table 4.2-3**).
- **Offensive odors significance threshold.** A qualitative assessment indicating that a project may reasonably be expected to generate odorous emissions in such quantities as to cause detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which may endanger the comfort, repose, health, or safety of any such person or the public, or which may cause, or have a natural tendency to cause, injury or damage to business or property will have a significant adverse air quality impact.
- **Toxic air contaminants (TACs) significance thresholds.** The recommended significance thresholds for TACs are an increased lifetime probability of contracting cancer greater than 10 in one million (with T-BACT) and a ground-level concentration of non-carcinogenic toxic air pollutants that would result in a Hazard Index of greater than 1.
- **Cumulative contribution.** The EDCAQMD's primary criterion for determining whether a proposed project has significant cumulative impacts is based on the project's consistency with the air quality attainment plan. A project is considered cumulatively significant if one or more of the following conditions is met: (1) The project requires a change in the existing land use designation (i.e., general plan amendment, rezone), and projected emissions (ROG, NOx, CO, or PM_{10}) are greater than the emissions anticipated for the site if developed under the existing land use designation; (2) The project would individually exceed the EDCAQMD's

recommended project-level significance thresholds; (3) For impacts that are determined to be significant under the guide, the lead agency for the project does not require the project to implement the emission reduction measures contained in and/or derived from the air quality attainment plan; or (4) The project is located in a jurisdiction that does not implement the emission reduction measures contained in and/or derived from the air quality attainment plan.

4.2.6 Project Impacts

Threshold a. Conflict with or obstruct implementation of the applicable air quality plan?

SACOG prepares the MTP/SCS to provide federally mandated long-range transportation planning for the six-county area that includes El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties. SACOG collaborates with the El Dorado County Transportation Commission (EDCTC) to maintain consistency across county plans and the broader regional framework. The currently approved regional plans and programs are the SACOG and the 2023-2026 SACOG Metropolitan Transportation Improvement Program (MTIP). On December 16, 2022, the SACOG 2023-26 Metropolitan Transportation and Improvement Program (MTIP), Amendment #2 to the Metropolitan Transportation Plan – Sustainable Communities Strategy (MTP), and accompanying Air Quality Conformity Analysis received federal approval. In accordance with the MTIP, the proposed project is exempt from conformity per 40 CFR 93.126, “Safety: Widening narrow pavements or reconstructing bridges (no additional travel lanes)”.

The primary source of air pollution for the proposed project would occur as a result of construction activities (i.e., grading) and construction vehicle emissions. The proposed project would comply the EDCAQMD’s air quality guidelines and would implement construction best management practices (BMPs).

While the Clay Street Bridge would be replaced and widened to two-lanes, Clay street is two lanes north and south of the bridge, and the bridge accommodated two-way traffic. Therefore, the proposed project would not increase capacity for vehicles in the proposed project area. Thus, long-term air quality concerns are not anticipated. The proposed project would not conflict with or obstruct implementation of an applicable air quality plan, and the impact level is less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE

Impacts regarding conflicts or obstructing applicable air quality plan were determined to be less than significant without mitigation. Therefore, no

mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

CONSTRUCTION

During construction, temporary degradation of air quality may occur due to the release of particulate emissions (airborne dust) generated by excavation, grading, hauling, and other activities related to construction. Emissions from construction equipment are also anticipated and would include CO, NOx, VOCs, directly emitted PM10 and PM2.5, and TACs (i.e., diesel exhaust PM). O3 is a regional pollutant derived from NOx and VOCs in the presence of sunlight and heat. Construction activities associated with the proposed project would be temporary (up to nine months), thus, would not require more than five years to complete; therefore, construction emissions are not considered for conformity purposes.

Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the proposed project site could deposit mud on local streets, which could be an additional source of airborne dust after it dries. PM10 emissions would vary from day to day depending on the nature and magnitude of construction activity and local weather conditions. PM10 emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of equipment operating. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Construction activities for large development projects are estimated by the USEPA to add 1.2 tons of fugitive dust per acre of soil disturbed per month of activity. If water or other soil stabilizers are used to control dust, the emissions can be reduced by up to 50 percent. Caltrans Standard Specifications (Section 14-9.02) pertaining to dust minimization requires the use of water or dust palliative compounds and will reduce potential fugitive dust emissions during construction. In addition, the proposed project is within the EDCAQMD jurisdiction and required to comply with the respective EDCAQMD Fugitive Dust Rule to minimize emissions of fugitive dust during construction activities.

Heavy-duty trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO2, NOx, VOCs, and some soot particulate (PM10 and PM2.5) in exhaust emissions. These emissions would be temporary and limited to the immediate area surrounding the construction site. In order to minimize the temporary exhaust emissions from the heavy-duty trucks and construction equipment adjacent to sensitive receptors along Cedar Ravine Road, certain construction activities (i.e., extended idling, material storage, and equipment maintenance) would be limited as much as possible.

SO2 is generated by oxidation during combustion of organic sulfur compounds contained in diesel fuel. Off-road diesel fuel meeting federal standards can contain 300 parts per million (ppm) or more of sulfur, whereas on-road diesel is restricted to less than 15 ppm of sulfur. However, under California law and CARB regulations, off-road diesel fuel used in California must meet the same sulfur and other standards as on-road diesel fuel (not more than 15 ppm); thus, SO2-related issues due to diesel exhaust would be minimal.

Construction emissions for the proposed project are estimated based on the engineer's estimate for construction activities using the Road Construction Model developed by the SMAQMD. The emissions calculations are summarized in **Table 4.2.5** and **Table 4.2.6.**

TABLE 4.2.5 DAILY EMISSION ESTIMATES

CONSTRUCTION ACTIVITY	ROG	CO	NOX	PM10	$PM_{2.5}$	CO2
Grubbing/Clearing (lbs/day)	0.58	12.43	1.89	10.08	2.14	2,233.23
Grading/Excavation (lbs/day)	2.87	57.10	6.41	10.35	2.37	9,562.38
Drainage/Utilities/Sub-grade (lbs/day)	1.58	33.41	3.92	10.24	2.26	5,657.79
Paving (lbs/day)	0.77	18.54	2.24	0.12	0.09	2,895.43
Maximum (lbs/day)	**2.87**	**57.10**	**6.41**	**10.35**	**2.37**	**9,562.38**
Total (tons)	**0.26**	**5.25**	**0.61**	**1.16**	**0.26**	**878.86**

Source: SMAQMD Road Construction Emissions Model, Version 9.0.0 2018

TABLE 4.2.6 TOTAL EMISSION ESTIMATES

CONSTRUCTION ACTIVITY	ROG	CO	NOX	PM10	$PM_{2.5}$	CO2
Grubbing/Clearing (tons)	0.01	0.16	0.02	0.13	0.03	29.48
Grading/Excavation (tons)	0.17	3.39	0.38	0.61	0.14	568.01
Drainage/Utilities/Sub-grade (tons)	0.06	1.32	0.16	0.41	0.09	224.05
Paving (tons)	0.02	0.37	0.04	0.00	0.00	57.33
Maximum (tons/phase)	**0.17**	**3.39**	**0.38**	**0.61**	**0.14**	**568.01**
Total (tons/construction project)	**0.26**	**5.25**	**0.61**	**1.16**	**0.26**	**878.86**

Source: SMAQMD Road Construction Emissions Model, Version 9.0.0 2018

The EDCAQMD considers combined increases in O3-precursor emissions of ROG and NOx greater than 164 lbs/day (i.e., 82 lbs/day/pollutant) as significant during proposed project construction activities. Both concentrations of ROG and NOx are under the 82 lbs/day/pollutant threshold.

During construction, contractors are required to comply with the requirements of all applicable State and local regulations, including, but not limited to, EDCAQMD Rules 202, 205, 207, 215, 223-1, 223-2, 224, and 233 (described above). In addition, the proposed project would comply with the Caltrans Standard Specifications, Section 14, specifically, Section 14-9.01 that requires compliance by the contractor with all applicable laws and regulations related to air quality, including the EDCAQM rules and regulations and local ordinances, and Section 14-9.02 that directs controlling dust.

Other best management practices (BMPs) to comply with the EDCAQMD would include/but are not limited to:

- Applying water or dust palliative to the project site and equipment as frequently as necessary to control fugitive dust emissions. Fugitive emissions generally must meet a “no visible dust” criterion either at the point of emission or at the right-of-way line as required by EDCAQMD.
- Spreading soil binder on any unpaved roads used for construction purposes and all project construction parking areas.
- Washing trucks as they leave the project site as necessary to control fugitive dust emissions.
- Properly tuning and maintain construction equipment and vehicles. Use low-sulfur fuel in all construction equipment as provided in CCR Title 17, Section 93114.
- Developing a dust control plan documenting sprinkling, temporary paving, speed limits, and expedited revegetation of disturbed slopes as needed to minimize impacts to existing communities.
- Locating equipment and material storage sites at least 500 feet from the sensitive receptors.
- Keeping construction areas clean and orderly.
- Establishing environmentally sensitive areas or their equivalent at least 500 feet away from sensitive air receptors within which construction activities (i.e., extended idling, material storage, and equipment maintenance) would be prohibited.
- Using track-out reduction measures (i.e., gravel pads) at project access points to minimize dust and mud deposits on roads affected by construction traffic.

- Covering all transported loads of soils and wet materials prior to transport or provide adequate freeboard (space from the top of the material to the top of the truck) to minimize emission of dust (PM) during transportation.
- Promptly and regularly removing dust and mud that are deposited on paved, public roads due to construction activity and traffic to decrease PM.
- Routing and scheduling construction traffic to avoid peak travel times as much as possible to reduce congestion and related air quality impacts caused by idling vehicles along long roads.
- Installing mulch or plant vegetation after grading to reduce windblown particulate in the area. Be aware that certain methods of mulch placement (i.e., straw blowing) may themselves cause dust and visible emission issues, and may need to use controls (i.e., dampened straw).

The construction impacts to air quality would be short term in duration, approximately nine months; therefore, would not result in long-term adverse conditions. The proposed project would comply with federal, State, and local rules and regulations and would implement construction BMPs to further minimize construction emissions and the impact level is less than significant.

OPERATION

The SACOG 2023-26 MTIP, Amendment #2 to the MTP, and accompanying Air Quality Conformity Analysis received federal approval. In accordance with the MTIP, the proposed project is exempt from conformity per 40 CFR 93.126, “Safety: Widening narrow pavements or reconstructing bridges (no additional travel lanes)”, and as thus are exempt from operational analyses. The proposed project would not increase capacity of Clay Street, Main Street, or Cedar Ravine Road for vehicles in the proposed project area; therefore, long-term air quality concerns are not anticipated.

The proposed project includes all-way stop traffic control at the proposed Main Street/Clay Street/Cedar Ravine Road intersection. The proposed project would change the average delay per vehicle and the length of time vehicles would idle at the proposed project study intersections. The longer a vehicle idles in a single location, the more air pollutant emissions are generated. The emissions generated under existing conditions from idling vehicles queuing at the proposed project study intersections during the AM and PM peak hours are shown in **Table 4.2.7**.

TABLE 4.2.7 OPERATIONAL (IDLING) AND CRITERIAL POLLUTANTS AND PRECURSOR EMISSIONS- EXISTING CONDITIONS

INTERSECTION	TIME	VOLUME (CARS)	DELAY (SEC)	ROG (POUNDS)	CO (POUNDS)	NO_X (POUNDS)	PM_{10} (POUNDS)	$PM_{2.5}$ (POUNDS)
US 50/ Bedford Ave.	AM	3275	26	***0.1057***	***0.7334***	***0.6764***	***0.0174***	***0.0166***
	PM	3563	21	0.0928	0.6445	0.5944	0.0153	0.0146
Main St./ Bedford Ave.	AM	1054	18	0.0235	0.1634	0.1507	0.0039	0.0037
	PM	1216	22	***0.0332***	***0.2304***	***0.2125***	***0.0055***	***0.0052***

TABLE 4.2.7 OPERATIONAL (IDLING) AND CRITERIAL POLLUTANTS AND PRECURSOR EMISSIONS- EXISTING CONDITIONS								
INTERSECTION	TIME	VOLUME (CARS)	DELAY (SEC)	ROG (POUNDS)	CO (POUNDS)	NO_X (POUNDS)	PM_{10} (POUNDS)	$PM_{2.5}$ (POUNDS)
Main St./ Clay Street	AM	986	20	***0.0245***	***0.1699***	***0.1567***	***0.0040***	***0.0039***
	PM	1087	15	0.0202	0.1404	0.1295	0.0033	0.0032
Main St./ Cedar Ravine Rd.	AM	1156	8	0.0115	0.0797	0.0735	0.0019	0.0018
	PM	1271	10	***0.0158***	***0.1095***	***0.1010***	***0.0026***	***0.0025***
Pacific St./ Cedar Ravine Rd.	AM	1001	30	***0.0373***	***0.2587***	***0.2386***	***0.0061***	***0.0059***
	PM	930	24	0.0277	0.1923	0.1773	0.0046	0.0044
Total All Intersections (pounds/day)*				**2.1636**	**15.0185**	**13.8515**	**0.3567**	**0.3404**

*The total average daily volume of traffic through each intersection and total average daily delay times are not known; however, a conservative estimate was made of the daily traffic by multiplying the peak hour data by 10 to obtain pounds per day of emissions.

The emissions generated under proposed project conditions from idling vehicles queuing at the study intersections during the AM and PM peak hours are shown in **Table 4.2.8**. The table shows that the proposed project would have reduced emissions compared to existing conditions. As mentioned previously, the western portion of the County is in the federally designated nonattainment region for ozone. The EDCAQMD has determined that mass emissions in excess of 82 lbs/day for each of the O_3-precursor pollutants (i.e., ROG and NOx) could affect the EDCAQMD's commitment to attain the federal 1-hour ozone standard in the Sacramento region and thus could have a significant adverse impact on air quality. As shown in **Table 4.2.8**, both ROG and NOx total lbs/day within the proposed project are below the 82 lbs/day threshold.

TABLE 4.2.8 OPERATIONAL (IDLING) AND CRITERIAL POLLUTANTS AND PRECURSOR EMISSIONS- PROPOSED PROJECT								
INTERSECTION	TIME	VOLUME (CARS)	DELAY (SEC)	ROG (POUNDS)	CO (POUNDS)	NO_X (POUNDS)	PM_{10} (POUNDS)	$PM_{2.5}$ (POUNDS)
US 50/ Bedford Ave.	AM	3275	27	***0.1097***	***0.7616***	***0.7025***	***0.0181***	***0.0173***
	PM	3563	21	0.0928	0.6445	0.5944	0.0153	0.0146
Main St./ Bedford Ave.	AM	1054	17	0.0222	0.1543	0.1423	0.0037	0.0035
	PM	1216	20	***0.0302***	***0.2095***	***0.1932***	***0.0050***	***0.0047***
Main St./ Clay Street	AM	*Intersection removed under proposed project.*						
	PM							
Main St./ Cedar Ravine Rd.	AM	1215	12	0.0181	0.1256	0.1158	0.0030	0.0028
	PM	1346	15	***0.0251***	***0.1739***	***0.1604***	***0.0041***	***0.0039***
Pacific St./ Cedar Ravine Rd.	AM	1001	20	***0.0248***	***0.1724***	***0.1590***	***0.0041***	***0.0039***
	PM	930	18	0.0208	0.1442	0.1330	0.0034	0.0033

TABLE 4.2.8 OPERATIONAL (IDLING) AND CRITERIAL POLLUTANTS AND PRECURSOR EMISSIONS- PROPOSED PROJECT								
INTERSECTION	TIME	VOLUME (CARS)	DELAY (SEC)	ROG (POUNDS)	CO (POUNDS)	NO_x (POUNDS)	PM_{10} (POUNDS)	$PM_{2.5}$ (POUNDS)
Total All Intersections (pounds/day)*				**1.8980**	**13.1746**	**12.1509**	**0.3129**	**0.2986**

*The total average daily volume of traffic through each intersection and total average daily delay times are not known; however, a conservative estimate was made of the daily traffic by multiplying the peak hour data by 10 to obtain pounds per day of emissions.

The proposed project is in an unclassified/attainment area with respect to the federal CO standard. Consequently, the effects of localized CO hot-spot emissions were evaluated using the Transportation Project-Level Carbon Monoxide Protocol (CO Protocol), which was developed for Caltrans by the Institute of Transportation Studies at the University of California, Davis (Garza et al. 1997). The CO Protocol provides a qualitative step-by-step procedure to determine whether proposed project-related CO concentrations have the potential to generate new air quality violations, worsen existing violations, or delay attainment of the CAAQS or NAAQS for CO, and whether a quantitative analysis would be required based on the response to a list of screened questions. After reviewing the CO Protocol, it was determined that the proposed project is exempt from all emissions analysis.

The proposed project is in an area of nonattainment for PM10 and nonattainment (severe) for PM2.5. Therefore, pursuant to 40 CFR 93, a hot-spot analysis would normally be required for conformity purposes. However, the proposed project is classified as exempt from conformity requirements per 40 CFR 93.126, as this is a type of project that does not anticipate involving a significant number of, or resulting in an increase in, the number of diesel vehicles. Additionally, the proposed project is anticipated to reduce vehicle idling emissions (**Table 4.2.8**). The proposed project is expected to have a slightly positive/neutral influence on PM10 and PM2.5 emissions and would not result in adverse impacts to ambient PM10 and PM2.5, and the impact level is less than significant.

Additionally, the EDCAQMD considers development projects of the type and size that fall below the significance cut-points (82 lbs/day) for ROG and NOx also to be insignificant for CO and PM emissions.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE

Impacts regarding violating any air quality standard or contributing substantially to an existing or projected air quality violation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold c. Result in a cumulatively considerable net increase of any pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

The western portion of the County is designated as nonattainment for the state and federal O3 standards. The Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan was developed by the air districts in the Sacramento region to bring the region into attainment. The region addressed in the plan includes the MCAB portion of the County, and thus the proposed project.

In addition to not attaining the federal or state O3 standards, the region does not attain the federal PM2.5 standard or the state PM10 standard. The PM10 Implementation/Maintenance Plan and Re-Designation Request is intended to fulfill federal Clean Air Act requirements to redesignate the region from nonattainment to attainment of the PM10 NAAQS. The PM2.5 SIP attempts to fulfill requirements to redesignate the region from nonattainment to attainment of the PM2.5 NAAQS.

As mentioned previously, the proposed project is exempt from conformity per 40 CFR 93.126, “Safety: Widening narrow pavements or reconstructing bridges (no additional travel lanes)”, and as thus is exempt from operational analyses. The proposed project would not increase capacity on Main Street, Clay Street, or Cedar Ravine Road for vehicles in the proposed project area, thus, long-term air quality concerns are not anticipated.

The proposed project would change the average delay per vehicle and the length of time vehicles would idle at the study intersections. The cumulative year emissions currently generated under no project and project conditions from idling vehicles queuing at the project study intersections during the AM and PM peak hours are shown in **Table 4.2.9** and **Table 4.2.10**.

TABLE 4.2.9 OPERATIONAL (IDLING) AND CRITERIAL POLLUTANTS AND PRECURSOR EMISSIONS- CUMULATIVE NO PROJECT CONDITIONS

INTERSECTION	TIME	VOLUME (CARS)	DELAY (SEC)	ROG (POUNDS)	CO (POUNDS)	NOX (POUNDS)	PM10 (POUNDS)	PM2.5 (POUNDS)
US 50/ Bedford Ave.	AM	4650	95	0.2427	1.8903	1.9240	0.0441	0.0420
	PM	5240	93	***0.2678***	***2.0853***	***2.1225***	***0.0486***	***0.0464***
Main St./ Bedford Ave.	AM	1770	38	0.0370	0.2878	0.2929	0.0067	0.0064
	PM	1830	113	***0.1136***	***0.8849***	***0.9007***	***0.0206***	***0.0197***
Main St./ Clay Street	AM	1395	53	0.0406	0.3164	0.3220	0.0074	0.0070
	PM	1510	79	***0.0655***	***0.5104***	***0.5196***	***0.0119***	***0.0114***
Main St./ Cedar Ravine Rd.	AM	1880	38	0.0393	0.3057	0.3112	0.0071	0.0068
	PM	2030	73	***0.0814***	***0.6341***	***0.6454***	***0.0148***	***0.0141***

TABLE 4.2.9 OPERATIONAL (IDLING) AND CRITERIAL POLLUTANTS AND PRECURSOR EMISSIONS- CUMULATIVE NO PROJECT CONDITIONS								
INTERSECTION	TIME	VOLUME (CARS)	DELAY (SEC)	ROG (POUNDS)	CO (POUNDS)	NOX (POUNDS)	PM10 (POUNDS)	$PM_{2.5}$ (POUNDS)
Pacific St./ Cedar Ravine Rd.	AM	1620	47	0.0418	0.3258	0.3316	0.0076	0.0072
	PM	1690	84	***0.0780***	***0.6075***	***0.6183***	***0.0142***	***0.0135***
Total All Intersections (pounds/day)*				**6.0635**	**47.2213**	**48.0643**	**1.1012**	**1.0503**

*The total average daily volume of traffic through each intersection and total average daily delay times are not known; however, a conservative estimate was made of the daily traffic by multiplying the peak hour data by 10 to obtain pounds per day of emissions.

TABLE 4.2.10 OPERATIONAL (IDLING) AND CRITERIAL POLLUTANTS AND PRECURSOR EMISSIONS- CUMULATIVE PROPOSED PROJECT CONDITIONS								
INTERSECTION	TIME	VOLUME (CARS)	DELAY (SEC)	ROG (POUNDS)	CO (POUNDS)	NOX (POUNDS)	PM10 (POUNDS)	$PM_{2.5}$ (POUNDS)
US 50/ Bedford Ave.	AM	4650	94	0.2402	1.8704	1.9038	0.0436	0.0416
	PM	5240	88	***0.2534***	***1.9731***	***2.0084***	***0.0460***	***0.0439***
Main St./ Bedford Ave.	AM	1770	38	0.0370	0.2878	0.2929	0.0067	0.0064
	PM	1830	76	***0.0764***	***0.5951***	***0.6058***	***0.0139***	***0.0132***
Main St./ Clay Street	AM	*Intersection removed under proposed project.*						
	PM							
Main St./ Cedar Ravine Rd.	AM	1950	32	0.0343	0.2670	0.2718	0.0062	0.0059
	PM	2115	45	***0.0523***	***0.4073***	***0.4145***	***0.0095***	***0.0091***
Pacific St./ Cedar Ravine Rd.	AM	1620	29	0.0258	0.2010	0.2046	0.0047	0.0045
	PM	1690	50	***0.0464***	***0.3616***	***0.3680***	***0.0084***	***0.0080***
Total All Intersections (pounds/day)*				**3.9469**	**30.7378**	**31.2865**	**0.7168**	**0.6837**

*The total average daily volume of traffic through each intersection and total average daily delay times are not known; however, a conservative estimate was made of the daily traffic by multiplying the peak hour data by 10 to obtain pounds per day of emissions.

Under the cumulative proposed project conditions, intersections all have reduced idling emissions compared to the cumulative no project conditions. The proposed project would comply with federal, State, and local rules and regulations during proposed project implementation, and the impact level is less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE

Impacts regarding cumulatively considerable net increase of any pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold d. Expose sensitive receptors to substantial pollutant concentrations?

The nearest sensitive residential receptors are located along Cedar Ravine Road, as well as north of US 50. The nearest school is the Sierra Elementary School located approximately 1,000 feet east of the proposed project. The Marshall Medical Center and Marshall Emergency Department are located approximately 2,000 feet southeast of the proposed project.

CONSTRUCTION

In addition to fugitive dust emissions, heavy duty trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO_2, NO_X, VOCs, and some soot particulate (PM_{10} and $PM_{2.5}$) in exhaust emissions. These emissions would be temporary, approximately nine months, and limited to the immediate area surrounding the construction site. In order to minimize the temporary exhaust emissions from the heavy-duty trucks and construction equipment adjacent to certain sensitive receptors, certain construction activities (i.e., extended idling, material storage, and equipment maintenance) would be limited and BMPs, as outlined above, would be implemented.

As mentioned above, the proposed project area is located in a buffer zone identifying the potential for NOA resulting from a north–south-trending fault. Removal of the existing Clay Street Bridge and construction of a new bridge, construction of the realigned Clay Street through the Ivy House parking lot, and intersection improvements would involve ground disturbance that has the potential to encounter NOA because the proposed project site is within this buffer zone where NOA may be present.

EDCAQMD Rule 223-2 requires that an asbestos dust mitigation plan be prepared, submitted to and approved by the EDCAQMD, and implemented by the construction contractor when more than 20 cubic yards of earth will be moved at all sites identified as being in an Asbestos Review Area. Rule 223-2 requires testing for NOA prior to construction activities in areas likely to contain NOA and implementation of best management practices to control dust during construction. With adherence to the BMPs listed in Table 1 in EDCAQMD Rule 223-2, construction-related activities for the proposed project would not result in increased exposure of sensitive land uses to asbestos.

With adherence to federal, State, and local air quality rules and regulation, and the implementation of BMPs, construction-related activities for the proposed project would not be anticipated to result in increased exposure of air pollutants to sensitive receptors and the impact level is less than significant.

OPERATION

Sensitive receptors would not experience a permanent increase in air pollutant emissions because the proposed project would not increase capacity on Main Street, Clay Street, or Cedar Ravine Road, and would not increase trips or idling emissions in the proposed project area. The proposed project would be consistent with EDCAQMD rules and regulations, Caltrans Standard Specifications, and other regulations governing air quality, and the impact level is less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE

Impacts regarding exposing sensitive receptors to substantial pollutant concentrations were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold e: Create objectionable odors affecting a substantial number of people?

The occurrence and severity of odor impacts depends on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors. While offensive odors rarely cause any physical harm, they can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and regulatory agencies. Projects with the potential to frequently expose members of the public to objectionable odors would be deemed to have a significant impact.

During project construction, objectionable odors would occur in relation to operation of diesel-powered equipment and off-gas emissions during road-building activities (i.e., paving and asphalting). These phases of construction, particularly asphalt paving, would result in short-term odors in the immediate area of the construction activity, such as each paving site(s). Odors would be quickly dispersed upon completion of the activity and would quickly return to below detectable levels as distance from the site(s) and elapsed time from the activity increases. EDCAQMD Rule 215 (Architectural Coatings) limits the amount of VOC emissions from paving, asphalt, concrete curing, and cement coatings operations. The construction of the proposed project would comply with all applicable EDCAQMD rules. While construction equipment on site would generate some objectionable odors, primarily arising from diesel exhaust and

pacing activities, these emissions would generally be limited to the proposed project site and would be temporary in nature.

Long-term operation of the proposed project would not involve the use of any major odor emission sources and would be similar to existing conditions. As a result, implementation of the proposed project would not be anticipated to result in the exposure of a substantial number of people to odors, and the impact level is less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE

Impacts regarding objectionable orders were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

4.2.7 Cumulative Impacts

The cumulative setting for air quality includes the western County portion of the MCAB. The western portion of the County is designated as nonattainment for the federal and State O3 and PM10 standard. In addition, the County does not attain the federal PM2.5 standard. Reduction of particulate matter by all feasible means is necessary to attain PM standards.

The EDCAQMD's primary criterion for determining whether a proposed project has significant cumulative impacts is based on the project's consistency with the air quality attainment plan. A proposed project is considered cumulatively significant if one or more of the following conditions is met:

1) The project requires a change in the existing land use designation (i.e., general plan amendment, rezone), and projected emissions (ROG, NOx, CO, or PM10) are greater than the emissions anticipated for the site if developed under the existing land use designation;
2) The project would individually exceed the EDCAQMD's recommended project-level significance thresholds;
3) For impacts that are determined to be significant under the guide, the lead agency for the project does not require the project to implement the emission reduction measures contained in and/or derived from the air quality attainment plan; or
4) The project is located in a jurisdiction that does not implement the emission reduction measures contained in and/or derived from the air quality attainment plan.

There would be no change to the existing land use designations in the area. Emissions generated from construction and implementation of the proposed project do

not exceed the EDCAQMD's 82 lbs/day threshold in both present and cumulative conditions. Additionally, idling emissions are reduced in the existing and cumulative conditions with the proposed project. The proposed project would not conflict with implementation of the applicable air quality plans and the proposed project would be required to comply with all applicable EDCAQMD rules, as well as other federal, State, and local regulations.

It is possible that other construction projects would be occurring in the nearby vicinity of the proposed project at the same time. Other projects would be subject to conformity analysis, BMPs, mitigation measures, and separate environmental documents to be approved to mitigate air quality impacts. The proposed project would not contribute to significant cumulative impacts regarding construction emissions or long-term air quality impacts.

4.3 Biological Resources

4.3.1 Introduction

This section of the Recirculated Environmental Impact Report (REIR) addresses potential impacts of the Clay Street Bridge Replacement Project (proposed project) on biological resources. This section, incorporated from the information presented in the Natural Environment Study (NES) (Dewberry 2026), includes a summary of applicable regulations, a description of existing biological conditions, and an analysis of potential impacts associated with the proposed project. Potential impacts on the natural environment construction and operation of the project are discussed using applicable thresholds where indicated. Mitigation Measures that would reduce impacts, where applicable, are also discussed. The proposed project's impacts to hydrology and water quality are evaluated in **Section 4.7**.

4.3.2 Environmental Setting

The proposed project is located in an area dominated by urban (developed) habitat with a narrow strip of valley foothill riparian habitat occurring along the northern bank of Hangtown Creek. A series of retaining walls have been constructed along the south bank and rip-rap and other retaining walls occur in various locations on the north bank of the creek within the proposed project area. Land use within the proposed project consists of residential and medium- to high-density commercial development.

4.3.2.1 Natural Communities

As defined in the NES, the BSA comprises the areas that would be both temporarily or permanently impacted by the proposed project and a 100-foot buffer around the impact area. Terrestrial habitat types in the BSA include ruderal grassland, valley foothill riparian, montane hardwood-conifer forest, and urban (developed). Aquatic habitat types in the BSA include riverine features (Hangtown Creek, Cedar Ravine Creek, and a drainage ditch). Terrestrial habitats are discussed below; more detail on aquatic habitat types can be found in the **Section 4.3.2.2, Wetlands and Other Waters**. A habitat map is included in **Figure 4.3-1** and a summary of habitat types within the BSA is shown below in **Table 4.3.1**.

Habitat Map of the Biological Survey Area (BSA)



Clay Street Bridge Replacement Project

Figure 4.3-1

Legend

- Biological Study Area

Habitat Types

- Riverine (Drainage Ditch)
- Montane Hardwood-Conifer Forest
- Riverine (Cedar Ravine Creek)
- Riverine (Hangtown Creek)
- Ruderal Grassland
- Urban (Developed)
- Valley Foothill Riparian Forest

N

0 320 US Feet

Author: I. Ciraulo
Last updated on Friday, November 3, 2023

Dewberry

Path: U:\15029 - Clay Street - City Placerville\400 Project Design Files\460 Environmental\GIS\APRX\ClayStreet_2023_EIR\ClayStreet_2023_EIR.aprx

TABLE 4.3.1 HABITAT TYPES WITHIN THE BIOLOGICAL STUDY AREA		
HABITAT TYPE	**ACRES WITHIN PROPOSED PROJECT AREA**	**PERCENT COMPOSITION OF PROPOSED PROJECT AREA**
Upland Communities		
Ruderal Grassland	0.70	3
Valley Foothill Riparian	0.72	3
Montane Hardwood-Conifer Forest	3.16	14
Urban (Developed)	18.23	79
Aquatic Communities		
Riverine (Hangtown Creek) - Intermittent	0.27	1
Riverine (Cedar Ravine Creek) - Intermittent	0.06	0
Riverine (Drainage Ditch) - Ephemeral	0.02	0
Total	**23.16**	**100%**

Source: Drake Haglan 2016

RUDERAL GRASSLAND

Ruderal grassland habitat occurs in areas associated with ground disturbance, including grading, vehicle use, and/or intensive vegetation management. Due to the disturbance regime, these areas remain sparsely vegetated and are dominated by assemblages of introduced weedy species. Ruderal grassland habitat occurs in association with the montane hardwood-conifer forest. Ruderal grasslands contain species similar to annual grassland habitat but are dominated by nonnative grasses and forb species that are adapted to regular disturbance. Common species represented in this habitat include Italian ryegrass (*Festuca perennis*), ripgut brome (*Bromus diandrus*), soft chess brome (*Bromus hordeaceus*), and wild oat (*Avena* spp.). Additional plant species observed in this area include black mustard (*Brassica nigra*), spring vetch (*Vicia sativa*), smooth cat's-ear (*Hypochaeris glabra*), geranium (*Geranium dissectum*), and filaree (*Erodium botrys*). Approximately 0.70-acre of ruderal grassland occurs within the BSA.

URBAN (DEVELOPED)

Within the BSA, urban areas are landscaped with ornamental species, paved, or otherwise developed and generally lack natural vegetation. Urban areas within the proposed project include Main Street, Clay Street, Cedar Ravine Road, Pacific Street, Thompson Way, Locust Avenue, the Ivy House parking lot, and the El Dorado Trail, as well as the residential and commercial areas. Urban environments generally provide limited habitat for common wildlife species.

VALLEY FOOTHILL RIPARIAN

Valley foothill riparian habitat occurs in association with Hangtown Creek as a narrow corridor along the northern bank. Characteristic species that comprise the upper story

of riparian habitat within the BSA include white alder (*Alnus rhombifolia*) and arroyo willow (*Salix lasiolepis*), which are the dominant tree species in this community. Other trees present in lesser abundance are incense cedar (*Calocedrus decurrens*), big-leaf maple (*Acer macrophyllum*), Fremont cottonwood (*Populus fremontii*), the nonnative, invasive tree-of-heaven (*Ailanthus altissima*), and Lombardy poplar (*Populus nigra*). The understory consists of shrubs and herbaceous species, including Himalayan blackberry (*Rubus armeniacus*), annual grasses, and poison oak (*Toxicodendron diversilobum*).

VEGETATION ALLIANCES

- *Alnus rhombifolia – Acer macrophyllum* (61.420.03) White Alder Groves Alliance

MONTANE HARDWOOD

Montane hardwood-conifer forest occurs in remnant patches within the urban matrix of the BSA. The tree canopy is sparse but is dominated by California black oak (*Quercus kelloggii*). Valley oak (*Quercus lobata*), interior live oak (*Quercus wislizeni* var. *wislizeni*), ponderosa pine (*Pinus ponderosa*), incense cedar, California buckeye (*Aesculus californica*), Northern California black walnut (*Juglans californica* var. *hindsii*), and knob-cone pine (*Pinus attenuate*) are also present. White-leaf manzanita (*Arctostaphylos viscida*) is the dominant species in the shrub layer of this community. The herbaceous layer is composed of native and nonnative grasses and forbs.

VEGETATION ALLIANCES

- *Quercus kelloggii – Calocedrus decurrens* (71.010.21) California Black Oak Forest Alliance

4.3.2.2 Wetlands and Other Waters

There are no wetlands within the BSA; Hangtown Creek, Cedar Ravine Creek (Cedar Ravine), and an ephemeral drainage ditch are located within the BSA and considered other waters (**Table 4.3.2**).

TABLE 4.3.2 POTENTIALLY JURISDICTIONAL AQUATIC FEATURES WITHIN THE BSA

MAP ID	WETLAND TYPE – COWARDIN CLASSIFICATION	AVERAGE WIDTH OF OHWM (FEET)	LENGTH (FEET)	ACRES
Other Waters				
Riverine (Hangtown Creek) – Intermittent	Riverine Intermittent Streambed Seasonally Flooded	8	1,668	0.27
Riverine (Cedar Ravine Creek) – Intermittent	Not classified	5	503	0.06
Riverine (Drainage Ditch) – Ephemeral	Not classified	n/a	242	0.02

TABLE 4.3.2 POTENTIALLY JURISDICTIONAL AQUATIC FEATURES WITHIN THE BSA				
MAP ID	WETLAND TYPE – COWARDIN CLASSIFICATION	AVERAGE WIDTH OF OHWM (FEET)	LENGTH (FEET)	ACRES
Total			2,413	0.35

Hangtown Creek is a perennial channel that flows west through the proposed project area. Hangtown Creek is shown as a perennial channel on the U.S. Geological Survey (USGS) Placerville quadrangle map and is mapped as riverine, intermittent, streambed, seasonally flooded (R4SBC) on the National Wetland Inventory (NWI) map. Cedar Ravine empties into Hangtown Creek at the Clay Street Bridge. Flows in Hangtown Creek are supplemented by urban runoff and landscape irrigation.

A series of retaining walls and rip-rap forms the south bank of Hangtown Creek while graded slopes, retaining walls, and rip-rap form the north bank. A sewer main follows the alignment of Hangtown Creek. The bed of Hangtown Creek is mostly bedrock. Vegetation consists of white alder, willow, Fremont cottonwood, and hydrophytic herbs. The ordinary high water mark (OHWM) determination was based primarily on the presence of scour on the north bank and water staining on the south bank and is approximately 8 feet. Hangtown Creek was flowing during all site visits.

Cedar Ravine Creek, a tributary to Hangtown Creek, consists of an open channel, with defined bed and bank that flow freely along Cedar Ravine Road, south of Pacific Street, and transitions to a closed conduit constructed of various materials and geometrics with varying ages beginning near Pacific Street to the outfall at Hangtown Creek. Cedar Ravine Creek is shown as an intermittent channel on the USGS Placerville quadrangle map; it is not classified on the NWI map. Hydrology for Cedar Ravine is provided by flow originating south of the BSA; flows in Cedar Ravine Creek are supplemented by urban runoff and landscape irrigation. The OHWM at the Cedar Ravine Culvert is the sides of the culvert and is approximately 5 feet. Cedar Ravine Creek was flowing during all the site visits.

Runoff from Locust Avenue collects in a paved roadside gutter that empties into an earthen ditch. The ditch drains around the roadside pullout along Locust Avenue and empties into a drain inlet near the U.S. Highway 50 (US 50) overpass. Some of the road runoff has eroded a rill near Locust Avenue that drains to the ditch.

4.3.2.3 Plant Species

Much of the BSA is developed or paved, and therefore, lacks vegetation. Two small areas of native vegetation communities (valley foothill riparian, montane hardwood-conifer forest) were identified within the BSA and may support special-status plant species.

After completion of the field surveys and review of existing information on special-status plants from the U.S. Fish and Wildlife Service (USFWS), California Natural Diversity Database (CNDDB), and California Native Plant Society (CNPS) record searches, it was determined one special-status plant species has the potential to occur within the BSA: Sierra arching sedge (*Carex cyrtostachya*).

Sierra arching sedge is a CNPS List 1.B species; it has no State or federal status. This species occurs in meadows, seeps, marshes, and swamps, mesic areas of lower montane coniferous forest, and riparian forest margins.

There are no known occurrences of Sierra arching sedge within 5 miles of the BSA. The closest CNDDB record for Sierra arching sedge is located approximately 10 miles north of the BSA. Five plants were observed at this location in 2015. Sierra arching sedge was not observed in the BSA during site surveys; however, potential habitat exists in the BSA within the riparian habitat. Though potential habitat is of low quality given the disturbed nature of Hangtown Creek, including the retaining walls, riprap, and limited substrate, the species has low potential to occur.

4.3.2.4 Animal Species

Habitats within the BSA are not suitable for many wildlife species due to the developed nature and a strong human presence. After completion of the field surveys and review of existing information on special-status wildlife in the project region from the USFWS and CDFW record searches, it was determined that potential habitat for two special-status wildlife species occurs within the BSA: foothill yellow-legged frog (*Rana boylii*) and northwestern pond turtle(*Actinemys marmorata)*. In addition, there is the potential for nesting migratory birds and raptors to occur in the BSA. The FYLF is a Federally and State-listed endangered species in the BSA and is discussed under **Section 4.3.2.5 Threatened and Endangered Species,** below. Although Hangtown Creek is within the historic range of California red-legged frog (CRLF) (*Rana draytonii*), this species has likely been extirpated from the City of Placerville (City).

NORTHWESTERN POND TURTLE

Western pond turtles, including both the northwestern (ssp. *marmorata*) and southwestern (ssp. *pallida*) subspecies, are California state species of concern. Western pond turtles occur in a variety of permanent and intermittent aquatic habitats, such as ponds, marshes, rivers, streams, and ephemeral pools. Pond turtles require suitable basking and haul-out sites, such as emergent rocks or floating logs, which they use to regulate their temperature throughout the day (Holland 1994). In addition to appropriate aquatic habitat, these turtles require an upland oviposition site in the vicinity of the aquatic habitat, often within 200 meters (656 feet). Nests are typically dug in grassy, open fields with soils that are high in clay or silt fraction. Egg-laying usually takes place between March and August (Zeiner et al. 1988).

The closest recorded occurrence for NWPT is located approximately 0.9 mile southeast of the BSA. Habitat consisted of a freshwater pond, dominated by cattails; surrounded by willows, blackberry vines, rushes, native grasses, and toyon. Three adults and two juveniles were observed on May 16, 2001, with observations continued through 2002. This occurrence is associated with the El Dorado Irrigation Main Canal, which according to hydrography data in the BIOS does not connect directly with Hangtown Creek

Hangtown Creek does not provide suitable habitat for this species most of the year due to lack of suitable basking structure, heavy canopy shading, lack of forage (aquatic vegetation, fish, and amphibians), and urban setting that fragments any available habitat. The stretch of Cedar Ravine Creek in the BSA does not provide habitat for western pond turtle because it is confined within a culvert. No NWPTs were observed during surveys conducted in 2007, 2008, 2009, or 2024.

BASED ON THE LACK OF RECORDED OCCURRENCES AND LACK OF SUITABLE HABITAT, NWPT ARE PRESUMED TO BE ABSENT, AND ARE NOT EXPECTED TO OCCUR WITHIN THE BSA.MIGRATORY BIRDS AND RAPTORS

California Fish and Game Code 3503.5 protects all birds in the orders Accipitriformes, Falconiformes, and Strigiformes (collectively known as raptors or birds of prey) and includes hawks, eagles, falcons, and owls. All other migratory bird species, with the exception of nonnative and invasive bird species, are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 (16 USC 703-711).

Swallows, such as the barn swallow (*Hirundo rustica*) and cliff swallow (*Petrochelidon pyrrhonota*), and black phoebes (*Sayornis nigricans*) commonly nest on the undersides of bridges that cross over, or are in close proximity to, aquatic habitats such as rivers, streams, and lakes. Such bridges provide suitable nesting habitat due to their proximity to nest building material and well as optimal foraging habitat. Aquatic habitats and associated corridors provide habitat for large numbers of aquatic and terrestrial insects, which are these species primary prey items.

Common raptors, such as red-shouldered hawk (*Buteo lineatus*) and red-tailed hawk (*Buteo jamaicensis*), and birds, such as tree swallows (*Tachycineta bicolor*) and sparrows, commonly nest in large trees that overhang, or are in close proximity to (within ¼ mile), aquatic habitats such as rivers, streams, and lakes, as well as in close proximity to annual grassland and agricultural fields. Large trees provide suitable nesting habitat due to their proximity to nest building material as well as optimal foraging habitat. Aquatic and terrestrial habitats and associated corridors provide habitat for large numbers of aquatic and terrestrial insects, which are these species primary prey items.

The valley foothill riparian habitat along Hangtown Creek, as well as the patches of montane hardwood-conifer forest provides potential nesting and foraging habitat for

birds listed by the MBTA. No nests or nesting activity were observed during surveys conducted in 2007, 2008, 2009, or 2015.

4.3.2.5 Threatened and Endangered Species

FEDERAL OR STATE-LISTED OR PROPOSED PLANT SPECIES

No federally listed or proposed plant species are known, or expected, to be present in the vicinity of the BSA.

FEDERAL OR STATE-LISTED OR PROPOSED WILDLIFE SPECIES

FOOTHILL YELLOW-LEGGED FROG

The foothill yellow-legged frog (FYLF) is a federal and State-listed endangered species. This species occurs in woodland and forest areas near streams and rivers, especially near riffles where there are rocks (Stebbins 2003). Egg clusters are attached to gravel or rocks in moving water near stream margins and tadpoles require water for at least 3 or 4 months while completing their aquatic development (Zeiner et al. 1988). FYLF require permanent streams in which to reside (Verner and Boss 1980).

There are various recorded occurrences in CNDDB of FYLF within approximately 10 miles of the BSA, many of which are reported extirpated. A few extant occurrences are reported in CNDDB but none of these extant occurrences are within the Weber Creek watershed.

FYLF were not observed in the BSA during the reconnaissance surveys, general biological survey, the delineation fieldwork, or during the protocol CRLF and FYLF surveys conducted in the BSA and within a 2.5-mile radius of the BSA. Hangtown Creek in the BSA provides very marginal habitat for FYLF. This reach of the creek is located within the city of Placerville and is surrounded by heavy development on both sides, including Highway 50 and residential lots to the north and extensive commercial areas to the south, with some portions channelized underground beneath these developed areas, creating high levels of disturbance and fragmentation including retaining walls and other hardscape features. Crayfish and sunfish are also abundant throughout the creek. Furthermore, Hangtown Creek within the BSA lacks the suitable breeding conditions that FYLF require, such as permanent, shallow, flowing water and absence of predators.

Hangtown Creek is a tributary to Weber Creek, whose watershed has no recent or extant observations of FYLF. Due to the very marginal, dilapidated habitat and lack of any recent occurrences within the local watershed, Hangtown Creek, and potentially the larger Weber Creek watershed, likely does not support a FYLF population. This is further evidenced by information from CNDDB indicating that no FYLF have been detected in North Fork Weber Creek during herpetofauna surveys conducted in 1997, 2000, 2001, 2002, or in 2017. Cedar Ravine Creek, a tributary to Hangtown Creek, is confined entirely within an underground culvert within the BSA, and therefore also

does not provide suitable habitat for FYLF. Based on this information, FYLF are presumed to be extirpated within the vicinity of Placerville, including the BSA, and are not expected to occur.

4.3.2.6 Invasive Species

Plant species observed in the BSA were compared to the invasive plant list maintained by the California Invasive Plant Council (Cal-IPC) (Cal-IPC 2023) and the list of noxious weeds maintained by the California Department of Food and Agriculture (CDFA) (CDFA 2020). Several invasive and noxious weed species occur in the BSA. CDFA List “A” species are subject to state enforced action involving eradication, quarantine, regulation, containment, rejection, or other holding action. CDFA List “B” species warrant eradication, containment, control, or other holding action. CDFA List “B” species warrant eradication, containment, rejection, or other holding action at the discretion of the commissioner. CDFA List “C” species warrant state endorsed holding action and eradication only when found in a nursery; actions to retard spread outside of nurseries at the discretion of the commissioner; and rejection only when found in a crop seed for planting or at the discretion of the commissioner. CDFA CCR 4500 list species are invasive weeds have significant effects on the agricultural industry and environment. They can intensify drought impacts, increase fire hazard, decrease rangeland productivity, reduce water resources, raise nursery business costs, and diminish wildland diversity.

In addition, the Cal-IPC categorizes plants as “High”, “Moderate”, or “Limited”, reflecting the level of each species’ negative ecological impact in California. Each plant on the list received an overall rating based on the following evaluation criteria:

- **High** – These species have severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal and establishment. Most are widely distributed ecologically.
- **Moderate** – These species have substantial and apparent, but generally not severe, ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal, though establishment is generally dependent upon ecological disturbance. Ecological amplitude and distribution may range from limited to widespread.
- **Limited** – These species are invasive but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent and problematic.

ENGLISH IVY (*HEDERA HELIX*)

English ivy has a rating of "high" on the Cal-IPC Invasive Plant Inventory (2023) but is not listed on the CDFA (2021) noxious weed list. It is a perennial (family Araliaceae) that grows as evergreen woody vines. English ivy, and other *Hedera* spp., are found throughout California along the coast, as well as in Shasta and Butte counties. *Hedera* spp. grows vigorously in forests where nothing else seems able to compete and inhibits regeneration of understory plants, including forest wildflowers and new trees and shrubs. A patch of English ivy was observed in the montane hardwood-conifer forest south of Main Street in the BSA.

FENNEL (FOENICULUM VULGARE)

Fennel, or sweet fennel, has a rating of "moderate" on the Cal-IPC Invasive Plant Inventory (2023) but is not listed on the CDFA (2021) noxious weed list. It is an erect perennial herb (family *Apiaceae*). Although the plant is very common throughout the state, dense local populations have been reported from Santa Cruz Island, in fields around the San Francisco Bay region, Palos Verdes Peninsula (Los Angeles County), and Camp Pendleton (San Diego County). It can drastically alter the composition and structure of many plant communities, including grasslands, coastal scrub, riparian, and wetland communities. It is still unclear whether culinary varieties of fennel are invasive. Fennel occurs in sparse patches along Hangtown Creek.

YELLOW STAR-THISTLE (*CENTAUREA SOLSTITIALIS*)

Yellow star-thistle has a rating of "high" on the Cal-IPC Invasive Plant Inventory (2023) and it is on the CDFA (2021) CCR 4500 list. It is a bushy winter annual (family *Asteraceae*) that invades 12 million acres in California. Yellow star-thistle inhabits open hills, grasslands, open woodlands, fields, roadsides, and rangelands, and it is considered one of the most serious rangeland weeds in the state. It propagates rapidly by seed, and a large plant can produce nearly 75,000 seeds. Yellow star-thistle was observed along Hangtown Creek as a component of ruderal vegetation along the El Dorado Trail.

SCOTCH BROOM (*CYTISUS SCOPARIUS*)

Scotch broom has a rating of "high" on the Cal-IPC Invasive Plant Inventory (2023) and it is on the CDFA (2021) CCR 4500 list. It is a perennial shrub (family *Fabaceae*), which grows in sunny sites with dry sandy soil, and spreads rapidly through pastures, borders of forests, and roadsides. Scotch broom can be found from the coast to the Sierra foothills. This weed crowds out native species, has a seedbank that can remain dormant for up to 80 years, diminishes habitat for grazing animals, and increases risk for wildland fires. Two young Scotch broom plants were observed along Hangtown Creek in the BSA.

RIPGUT BROME (*BROMUS DIANDRUS*)

Ripgut brome has a rating of "moderate" on the Cal-IPC Invasive Plant Inventory (2023) but is not listed on the CDFA (2021) noxious weed list. It is an exotic, invasive

species found throughout California, interfering with the establishment and survival of native vegetation. Ripgut brome is found throughout the annual grassland and disturbed areas in the BSA.

ITALIAN RYEGRASS (*FESTUCA PERENNIS*)

Italian ryegrass has a rating of "moderate" on the Cal-IPC Invasive Plant Inventory (2023) but is not listed on the CDFA (2021) noxious weed list. It is an exotic, invasive species found throughout California where it grows particularly well in wetlands and disturbed areas. Italian ryegrass is found throughout the annual grassland and disturbed areas in the BSA.

WILD OAT (*AVENA FATUA*)

Wild oat has a rating of "moderate" on the Cal-IPC Invasive Plant Inventory (2023) but is not listed on the CDFA (2021) noxious weed list. It is a winter annual grass that is a common agricultural weed. It occurs in most grassland areas in California, particularly in poor soils and along road edges. Wild oat has taken over grassland areas and displaced native grasses throughout much of California. Wild oat is found throughout the annual grassland habitat in the BSA.

SOFT CHESS (*BROMUS HORDEACEUS*)

Soft chess has a rating of "limited" on the Cal-IPC Invasive Plant Inventory (2023) but is not listed on the CDFA (2021) noxious weed list. It is widely distributed throughout lower elevations in California, especially in disturbed areas. Soft chess can crowd out native species due to its rapid growth in the spring. It often becomes established in grassland and oak savannah communities as well as disturbed habitats. Soft chess is found throughout the annual grassland in the BSA.

HIMALAYAN BLACKBERRY (*RUBUS ARMENIACUS*)

Himalayan blackberry has a rating of "high" on the Cal-IPC Invasive Plant Inventory (2023) but is not listed on the CDFA (2021) noxious weed list. It is an exotic, invasive species found in wetland-riparian areas along the Coast Ranges, Central Valley, and Sierra Nevada mountain range where it rapidly outcompetes and displaces native plant species. Himalayan blackberry forms dense thickets that severely limit light availability for other understory plants. This species also commonly occurs in disturbed areas and roadsides up to 1,600 meters (5,249 feet) in elevation (Cal-IPC 2023). Himalayan blackberry is found in patches within valley foothill riparian habitat, adjacent to Hangtown Creek in the BSA.

TREE-OF-HEAVEN (*AILANTHUS ALTISSIMA*)

Tree-of-heaven has a rating of "moderate" on the Cal-IPC Invasive Plant Inventory (2015) but is not listed on the CDFA (2010) noxious weed list. Tree-of-heaven is widely but discontinuously distributed in California. It was introduced as a landscape ornamental but escapes gardens and spreads by seeds and creeping roots that produce many suckers. It is most abundant along the coast and in the Sierra Nevada

mountain range foothills, primarily in wastelands and disturbed, semi-natural habitats. Tree-of-heaven is found within the valley foothill riparian habitat in the BSA.

4.3.3 Regulatory Setting

4.3.3.1 Federal

FEDERAL ENDANGERED SPECIES ACT

Under the ESA, the Secretary of the Interior and the Secretary of Commerce jointly have the authority to list a species as threatened or endangered (16 United States Code [USC] Section 1533[c]). Pursuant to the requirements of the ESA, an agency reviewing a proposed project within its jurisdiction must determine whether any federally listed threatened or endangered species may be present in the project site and determine whether the project will result in "take" of any such species. In addition, the agency is required to determine whether the project is likely to jeopardize the continued existence of any species proposed to be listed under the ESA or result in the destruction or adverse modification of critical habitat proposed to be designated for such species (16 USC Section 1536[3], [4]).

Section 7 of the ESA provides a means for authorizing incidental take of federally endangered or threatened species that result from federally conducted, permitted, or funded projects. Similarly, Section 10 authorizes incidental take of federally endangered or threatened species that result from non-federal projects.

FEDERAL CLEAN WATER ACT (CWA)

The federal Clean Water Act (CWA) provides guidance for the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters.

Section 401 requires that a project proponent for a federal license or permit that allows activities resulting in a discharge to waters of the U.S. must obtain a State certification that the discharge complies with other provisions of CWA. The Regional Water Quality Control Boards (RWQCBs) administer the certification program in California.

Section 402 establishes a permitting system for the discharge of any pollutant (except dredge or fill material) into waters of the U.S.

Section 404 establishes a permit program, administered by the U.S. Army Corps of Engineers (USACE), regulating the discharge of dredged or fill material into waters of the U.S., including wetlands. Implementing regulations by USACE are found at 33 Code of Federal Regulation (CFR) Parts 320-330. Guidelines for implementation are referred to as the Section 404(b)(1) Guidelines and were developed by the U.S. Environmental Protection Agency (USEPA) in conjunction with USACE (40 CFR Parts 230). The Guidelines allow the discharge of dredged or fill material into the aquatic system only if there is no practicable alternative that would have less adverse impacts.

EXECUTIVE ORDER 11990 – PROTECTION OF WETLANDS

Executive Order 11990 established a national policy to avoid adverse impacts on wetlands whenever there is a practicable alternative. The U.S. Department of Transportation (DOT) promulgated DOT Order 5660.1A in 1978 to comply with this direction. On federally funded projects, impacts to wetlands must be identified and alternatives that avoid wetlands must be considered. If wetland impacts cannot be avoided, then all practicable measures to minimize impacts must be included. This must be documented in a specific Wetlands Only Practicable Alternative Finding.

An additional requirement is to provide early public involvement in projects affecting wetlands. The Federal Highway Administration (FHWA) provides technical assistance (Technical Advisory 6640.8A) and reviews environmental documents for compliance.

FEDERAL MIGRATORY BIRD TREATY ACT

The MBTA (16 USC, Sec. 703, Supp. I, 1989) prohibits killing, possessing, or trading migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. This act encompasses whole birds, parts of birds, bird nests, and eggs. The MBTA is administered by USFWS and special permits from the agency are generally required for the take of any migratory birds. This act applies to all persons and agencies in the U.S., including federal agencies.

4.3.3.2 State Plans, Policies and Regulations

CALIFORNIA ENDANGERED SPECIES ACT

Under the California Endangered Species Act (CESA), the California Department of Fish and Wildlife (CDFW) has the responsibility for maintaining a list of threatened and endangered species designated under state law (CFGC Section 2070). Pursuant to the requirements of CESA, an agency reviewing a proposed project within its jurisdiction must determine whether any state-listed endangered or threatened species may be present in the project site and determine whether the proposed project will result in take of any such species. Under CESA, “take” is defined as the action of or attempt to “pursue, hunt, shoot, capture, collect, or kill.” The CDFW may authorize the incidental take of a state-listed species under Section 2081 of the CFGC. For species that are listed as threatened or endangered under both the ESA and CESA, and for which an incidental take permit has been issued in accordance with Section 10 of the ESA, CDFW may authorize take after certifying that the incidental take permit is consistent with CESA, pursuant to Section 2080.1 of the CFGC.

CALIFORNIA FISH AND GAME CODE

The CDFW provides protection from take for state-listed and non-listed species. The California Fish and Game Code (CFGC) defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” CFGC Section 2080 prohibits take of a species listed as endangered or threatened under the CESA and CFGC Section 2081 allows CDFW to issue an incidental take permit in accordance

with Title 14 California Code of Regulations (CCR) Sections 783.4(a) and (b), and CFGC Section 2081(b). Eggs and nests of all birds are protected from take under CFGC Section 3503. Raptors and raptor nests or eggs are protected from take under CFGC Section 3503.5. Migratory birds are expressly prohibited from take under CFGC Section 3513 and species designated by CDFW as fully protected species are protected from take under CFGC Sections 3511, 4700, 5050, and 5515.

EXECUTIVE ORDER 13112 – INVASIVE SPECIES

Executive Order (EO) 13112 requires federal agencies to combat the introduction or spread of invasive species in the U.S. The order defines invasive species as “any species, including its seeds, eggs, spores, or other biological material capable of propagating that species, that is not native to that ecosystem whose introduction does or is likely to cause economic or environmental harm or harm to human health." FHWA guidance issued August 10, 1999 directs the use of the state’s invasive species list, maintained by the California Invasive Species Council to define the invasive plants that must be considered as part of the National Environmental Policy Act (NEPA) analysis for a proposed project.

Under this EO, federal agencies cannot authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species in the U.S. or elsewhere unless all reasonable measures to minimize risk of harm have been analyzed and considered.

4.3.3.3 Regional Plans, Policies, and Regulations

CITY OF PLACERVILLE GENERAL PLAN

The following goals and policies from the General Plan are relevant to biological resources. These policies guide the location, design, and quality of development to protect biological resources such as wildlife habitat, open space corridors, and ecosystems.

Section V – Natural, Cultural and Scenic Resources

Goal D: To protect Placerville’s natural vegetation and diverse wildlife.

Policy D.1: The City shall make every effort to protect riparian vegetation. To this end, buildings and improvements shall be set back from watercourses.

Policy D.2: The City shall ensure that channel improvements to and tree and brush clearance activities along creeks within the city do not unnecessarily disturb riparian vegetation.

Policy D.3: New development shall be sited to protect native tree species, riparian vegetation, important concentrations of natural plants, and important wildlife habitat, to minimize visual impacts and to provide for continuity of wildlife corridors.

Policy D.6: To retain the natural landscape character of Placerville, introduced plants in public and private landscaping should be subordinate to and compatible with existing natural landscape.

Policy D.7: The City shall encourage creative site planning which will minimize the destruction of trees.

Policy D.8: The City shall condition development approval to minimum grading, disturbance of root systems, and compaction of soil under the drip line of trees during construction.

Policy D.11: The City shall take action to ensure the protection of Hangtown Creek and the creek area.

Goal I: To protect and enhance

Policy I.4: The City shall condition development approvals to protect natural features such as rock outcrops and trees.

Policy I.5: The City shall preserve creeks in as natural a state as possible.

Policy I.6: The City shall promote the development of streamside mini parks.

CITY OF PLACERVILLE WOODLAND AND FOREST CONSERVATION PLAN

Chapter 13 of Title VIII of the City's Code (Woodland and Forest Conservation Plan) outlines specific requirements for the preservation and protection of trees through the issuance of tree removal permits. However, the ordinance applies to private development/properties and is not applicable to the proposed project.

4.3.4 Methodology and Thresholds of Significance

4.3.4.1 Methodology

The description of existing conditions and impact analysis presented in this section is taken from the NES (Dewberry 2026). The NES consisted of field reconnaissance, review of agency information pertaining to listed species, and coordination with USFWS and CDFW staff. In addition, potentially jurisdictional wetlands and other waters of the United States were delineated in accordance with USACE methods.

The BSA includes all areas that could be impacted by the proposed project and a buffer (**Figure 4.3-1**). The project impact area includes all areas affected by bridge demolition, construction of the new bridge, realignment of Clay Street, and the staging areas. The BSA includes the locations where ground disturbance would occur and a 100-foot buffer.

4.3.4.2 Thresholds

Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects associated with biological resources. The following threshold questions are used to evaluate the impacts on biological resources:

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 CDFW or USFWS?

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

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 wetlands, etc.), through direct removal, filling, hydrological interruption, or other means?

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?

e) Substantially 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, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

However, as determined in the Initial Study/Notice of Preparation (IS/NOP) prepared for the proposed project (**Appendix A**), City Code Section 8-13-4 (Woodland Alteration Permit and Plan) provides guidance for the retention and preservation of tree canopies and woodland resources. However, the ordinance is not applicable to the project. Additionally, there are no adopted habitat conservation or natural community conservation plans that apply to the proposed project. Therefore, there would be no impact, and the following Thresholds of Significance are not discussed further:

f. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

g. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?

4.3.5 Project Impacts

Threshold a. Would the proposed project 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 CDFW or USFWS?

CONSTRUCTION

Construction activities have the potential to affect one special-status species: Sierra arching sedge. Construction activities could also potentially affect nesting migratory birds and raptors.

Sierra Arching Sedge

This plant could be impacted if present in the BSA. This species was not identified in the BSA during previous botanical surveys; however, potential habitat exists in the BSA within the riparian habitat. **Mitigation Measure BIO-1** would be required to identify if this species is present in the BSA and provide guidance if it is identified prior to the commencement of construction activities. This is a potentially significant impact.

Migratory Birds and Raptors. If demolition of the Clay Street Bridge begins during the breeding season (February 1 through September 30), the proposed project could result in mortality of young through forced fledging or nest abandonment by adult birds. Exclusion of nesting adult birds from the underside of the Clay Street Bridge could potentially result in disruption of nesting activities and the loss of nesting productivity for the season for some birds that do not move to other nesting sites outside of the BSA. However, widening of the bridge could ultimately result in a net increase of potential nesting habitat for swallows, black phoebes, and other bridge nesting birds. Mitigation measures would be required to reduce impacts to migratory birds and raptors.

The proposed project would remove up to 20 trees during construction, the majority are within the riparian corridor or within the montane hardwood-conifer areas. Prior to construction, if construction activities begin during the breeding season (February 1 through September 30), the proposed project could result in mortality of young through forced fledging or nest abandonment by adult birds, as well as destruction of nests. Mitigation measures would be required to reduce impacts to migratory birds and raptors, and nesting birds.

Mitigation Measure BIO-2 would be required to identify if an active nest is present in the BSA and provide guidance if it is identified prior to the commencement of construction activities. This is a potentially significant impact.

OPERATION

The BSA would be revegetated and returned to conditions similar to existing. Operation of the proposed project would be similar to existing conditions; therefore, the proposed project would not impact special-status species beyond what currently exists.

MITIGATION MEASURES

Mitigation Measure BIO-1: A qualified biologist or botanist shall conduct focused surveys for Sierra arching sedge during the normal blooming or identifying period for these species. The surveys shall be conducted within the construction area and prior to any ground disturbing activities. The results of the survey shall be documented in a concise memorandum. If the survey results are negative, work can proceed without additional measures.

If Sierra arching sedge is identified within the construction area, a qualified biologist shall prepare a salvage and relocation plan to avoid and minimize direct impacts to special-status plants. The plan shall identify the methods of salvage (e.g., seed collection, individual transplants) and the relocation area(s). Salvage efforts shall be conducted in coordination with CDFW and the local CNPS chapter.

Timing/Implementation:	*Prior to construction*
Monitoring/Enforcement:	*City of Placerville Engineering Department, and Consultant Biologist*

Mitigation Measure BIO-2: Migratory Birds and Raptors. The following measures shall be used when work occurs on or in the vicinity of trees or structures that may be subject to nesting by migratory birds:

- To avoid and minimize impacts to tree and shrub nesting species, the following measures shall be implemented:
  - Tree and shrub removal and grading activities shall be conducted during the non-breeding season (generally October 1 through January 31), if the construction schedule allows.
  - If grading and tree removal activities are scheduled to occur during the breeding and nesting season (February 1 through September 30), preconstruction surveys shall be performed prior to the start of project activities.
- If construction, grading, or other project-related activities are scheduled during the nesting season (February 1 to September 30), preconstruction surveys for other migratory bird species shall take place no less than 14 days and no more than 30 days prior to the beginning of construction within 250 feet of suitable nesting habitat.

- If the preconstruction surveys do not identify any nesting migratory bird species in areas potentially affected by construction activities, no further avoidance or minimization measures would be required.
- If the preconstruction surveys do identify nesting bird species in areas that may be affected by site construction, the following measure shall be implemented:
    - Project-related construction impacts shall be avoided by establishing appropriate no-work buffers to limit project-related construction activities near the nest site. The size of the no-work buffer zone shall be determined in consultation with the CDFW. The no-work buffer zone shall be delineated by highly visible temporary construction fencing. In consultation with the CDFW, monitoring of nest activity by a qualified biologist may be required if the project-related construction activity has the potential to adversely affect the bird's nest or nesting behavior. No project-related construction activity shall commence within the no-work buffer area until a qualified biologist confirms that the nest is no longer active.

- The following measures shall be incorporated for bridge-nesting birds if bridge demolition or construction of the new bridge occurs during the nesting season (February 1 through September 30):
    - Exclusionary netting shall be installed around the undersides of the existing bridge before February 1 of the construction year to prevent new nests from being formed and/or prevent the reoccupation of existing nests. Exclusionary netting may also be required during construction of the new bridge if it is completed during the breeding season. The construction contractor would be required to do the following:
        - Adhere to all state and federal laws and regulations pertaining to the protection of migratory birds, their nests, and young birds.
        - Remove all existing unoccupied nests on the bridge during the non-nesting season (October 1 through January 31).
        - Keep the bridge free of nests, using exclusionary netting or other approved methods, until construction activities are completed.
        - Inspect all listed structures for nesting activity a minimum of three days per week; no two days of inspection shall be consecutive. A weekly log shall be submitted to the project biologist. The contractor shall continue inspections until the existing bridge has been removed and construction on the new bridge is completed. If an exclusion device is found to be ineffective or defective, the contractor shall complete repairs to the device within 24 hours. If birds are found trapped in an

exclusion device, the contractor shall immediately remove the birds in accordance with USFWS guidelines.

- Submit for approval working drawings or written proposals of any exclusion devices, procedures, or methods to the project biologist before installing them.
- The method of installing exclusion devices shall not damage permanent features of the new bridge structure. Approval by the project biologist of the working drawings or inspection performed by the authorized project biologist shall in no way relieve the contractor of full responsibility for deterring nesting.

Timing/Implementation: *Prior and during construction*

Monitoring/Enforcement: *City of Placerville Engineering Department, and Consultant Biologist*

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding special status species were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measure BIO-1** and **BIO-2** were required or included, which would implement surveys, exclusionary measures, nest avoidance and other approaches to avoid harm to special status species. The impact level would be **less than significant with mitigation**.

Threshold b. Would the proposed project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS.?

The proposed project would not result in temporary (construction) impacts, as shown in **Table 4.3-3**. The proposed project would result in permanent effects to valley foothill riparian and montane hardwood-conifer forest habitat, which are sensitive natural communities and are regulated by the CDFW under CFGC Section 1602.

TABLE 4.3.3 SUMMARY OF TEMPORARY AND PERMANENT EFFECTS BY HABITAT TYPE

HABITAT COMMUNITY	PERMANENT (ACRES)	TEMPORARY (ACRES)	TOTALS (ACRES)
Ruderal Grassland	0.00	0.00	<0.01
Valley Foothill Riparian	0.04	0.00	0.04
Montane Hardwood-Conifer Forest	0.01	0.00	0.01
Urban (Developed)	1.30	0.00	1.30
Total	**1.35**	**0.004**	**1.35**

VALLEY FOOTHILL RIPARIAN

Approximately 0.72 acre of riparian forest is on the northern bank of Hangtown Creek within the BSA. The retaining walls on the south bank eliminate much of the bank habitat. The construction and widening of the Clay Street Bridge and its approaches would result in a permanent, direct impact of 0.04 acre of riparian habitat and would include the removal of four white alder trees as well as understory shrubs and herbaceous species (**Table 4.3.3** and **Table 4.3.4**). The loss of riparian vegetation is a potentially significant impact on aquatic habitat in Hangtown Creek.

MONTANE HARDWOOD-CONIFER FOREST

There are approximately 3.16 acres of montane hardwood-conifer forest in four distinct areas in the BSA; tree canopy is patchy. The construction and widening of the Clay Street Bridge and its approaches would result in a permanent, direct impact of 0.01 acre of montane hardwood-conifer habitat and would include the removal of approximately 20 trees, including eight valley oak trees, as well as understory shrubs and herbaceous species (**Table 4.3.4**). The loss of montane hardwood-conifer habitat is a potentially significant impact on common terrestrial species such as birds and tree-dwelling mammals.

TABLE 4.3.4 ESTIMATED TREES TO BE REMOVED DURING CONSTRUCTION FOR REPLACEMENT BRIDGE AND APPROACHES

COMMON NAME	SCIENTIFIC NAME	HABITAT ASSOCIATION (NUMBER REMOVED)
White alder	*Alnus rhombifolia*	Riparian (4) Urban (3)
Incense cedar	*Calocedrus decurrens*	Urban (4)
Maple	*Acer* sp.	Urban (1)
Valley oak	*Quercus lobata*	Montane Hardwood-Conifer (8)

There is no natural habitat in the Ivy House parking lot or along the proposed realigned Clay Street where it would intersect with Main Street, along Main Street, or along Cedar Ravine Road within the project limits. No sensitive habitats would be affected, and there would be no impact related to this component of the proposed project.

MITIGATION MEASURES

Mitigation Measure BIO-3: The following shall be implemented to reduce project effects on riparian and montane hardwood-conifer vegetation, oaks, and other native trees:

- Prior to removal of any trees, an ISA-certified arborist shall conduct a tree survey in areas that may be impacted by construction activities and that are not already slated for community-wide fire hardening. This survey

shall document tree resources that may be adversely impacted by project implementation. The survey will follow standard professional practices.

- Current riparian vegetation, oaks, and other native tree species will be retained to the extent feasible. A tree protection zone (TPZ) shall be established around any tree or group of trees to be retained. The TPZ will be delineated by an ISA-certified arborist. The TPZ shall be defined by the radius of the dripline of the tree(s) plus 1 foot. The TPZ of any protected trees shall be demarcated using fencing that will remain in place for the duration of construction activities.
- Construction-related activities shall be limited within the TPZ to those activities that can be completed by hand. No heavy equipment or machinery shall be operated within the TPZ. Grading shall be prohibited within the TPZ. No construction materials, equipment, or heavy machinery shall be stored within the TPZ.
- Protective fencing shall be installed along the edge of construction areas including temporary and permanent access roads where construction will occur (as determined by a qualified biologist). The location of fencing shall be marked in the field with stakes and flagging and shown on the construction drawings. The construction specifications shall contain clear language that prohibits construction-related activities, vehicle operation, material and equipment storage, trenching, grading, or other surface-disturbing activities outside of the designated construction area. Signs shall be erected along the protective fencing at a maximum spacing of one sign per 50 feet of fencing. The signs shall state: “This area is environmentally sensitive; no construction or other operations may occur beyond this fencing. Violators may be subject to prosecution, fines, and imprisonment.” The signs shall be clearly readable at a distance of 20 feet and shall be maintained for the duration of construction activities in the area.
- Where riparian vegetation occurs along the edge of the construction easement, the City shall minimize the potential for long-term loss of riparian vegetation by trimming vegetation rather than removing the entire plant. Trimming will be conducted per the direction of a biologist and/or certified arborist.
- To compensate for the permanent removal of riparian vegetation associated with the bridge construction, the City shall compensate for riparian tree and shrub removal by replacing habitat at a minimum 3:1 ratio (e.g., 3 acres planted for every one acre removed) as well as associated native herbaceous species, subject to regulatory permit conditions. Preservation and restoration may occur onsite or within the watershed through a conservation agreement or offsite through purchasing mitigation bank credits.
- Any onsite mitigation shall include planting of valley foothill/floodplain/mixed riparian species as appropriate. A planting plan will

be implemented as detailed in a Restoration Plan approved by the CDFW. The Restoration Plan will include performance standards for revegetation that will ensure successful restoration of the onsite riparian areas.

Timing/Implementation: *Prior and during construction*

Monitoring/Enforcement: *City of Placerville Engineering Department, and Consultant Biologist*

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding effects on any riparian habitat or other sensitive natural community were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measure BIO-3** was required or included, and the impact level would be lowered to **less than significant with mitigation**.

Threshold c. Would the proposed project 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 wetlands, etc.), through direct removal, filling, hydrological interruption, or other means?

There are no wetlands within the BSA; therefore, no impacts would occur as a result of the proposed project's construction or operations.

CONSTRUCTION

Stream flow in Hangtown Creek and Cedar Ravine would be diverted through the active construction zone. The stream diversion would be constructed within the existing channel to protect water flowing in Hangtown Creek from demolition and construction activities. The diversion would consist of pipe(s) as needed to convey flow rates anticipated during construction, and sandbags and plastic sheeting to construct diversion dams in the channel upstream and downstream of the site. Equipment used to construct the stream diversion would include light truck-mounted cranes above the channel, with small earthwork equipment (Bobcats, etc.) and laborers within the channel between the diversion dams. Minimization efforts shall include marking the limits of construction and temporary fencing to prevent affecting Hangtown Creek unnecessarily. In-stream work would be limited to between June 1 and October 15, unless the required permits approve work outside this period.

The Clay Street Bridge replacement component of the proposed project would temporarily impact approximately 0.01 acre of Hangtown Creek, which would result from stream diversion and removal of the existing bridge. Temporary impacts on Cedar Ravine Creek would result from realignment of Clay Street if segments of the culvert are damaged or uncovered during construction. This could affect 0.03 acre of the creek. Effects of disturbance to Hangtown Creek and Cedar Ravine and the adjacent riparian corridor would be minimized by revegetating areas of temporary

disturbance within the proposed project footprint with native vegetation. A planting plan, as required in **Mitigation Measures BIO-3**, would help to reduce impacts to Hangtown Creek and Cedar Ravine Creek.

Prior to construction, the City would be required to obtain the following permits to allow filling 0.001 acre of intermittent stream: USACE Clean Water Act Section 404 Nationwide Permit #14 (Linear Transportation Projects); CDFW Section 1600–1602 Streambed Alteration Agreement; and CVRWQCB Clean Water Act Section 401 Water Quality Certification. Additionally, during construction, water quality would be protected by implementation of BMPs (refer to **Section 4.7, Hydrology and Water Quality**), which would be described in the stormwater pollution prevention plan (SWPPP) required under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit.

OPERATIONAL

Features such as wetlands and other waters of the U.S. that may fall under the jurisdictional purview of the USACE were delineated in the BSA. Hangtown Creek is considered potentially jurisdictional. Removal of the existing bridge and construction of the new bridge and its abutments would involve construction activities along the banks of Hangtown Creek. Based on the preliminary project design, rock slope protection (RSP) would be installed on the banks of Hangtown Creek but would not permanently impact the Creek due to the minimal footprint of the RSP installation area. As a result, no impacts would occur and mitigation would not be required.

MITIGATION MEASURES

Implement **Mitigation Measure BIO-3.**

Timing/Implementation: *During permitting*

Monitoring/Enforcement: *City of Placerville Engineering Department*

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding effects on wetlands or Waters of the U.S. were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measure BIO-3** was required or included, and the impact level would be **less than significant with mitigation**.

Threshold d. Would the proposed project 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?

Hangtown Creek and Cedar Ravine Creek, and associated riparian and hardwood habitats, provide limited movement corridors for common wildlife and special-status

species through the BSA under existing conditions. Construction activities could temporarily affect migratory birds and raptors, as described in **Threshold a**; however, no additional impacts beyond those described in **Threshold a** would occur, but as such is a potentially significant impact and mitigation would be required.

The proposed project would not reduce wildlife movement potential because no permanent improvements are proposed within Hangtown Creek that would create physical barriers to dispersal. The culverted section of Cedar Ravine would continue to allow flow into Hangtown Creek.

MITIGATION MEASURES

Implement **Mitigation Measure BIO-1 and BIO-2**.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding movement of any native resident or migratory fish or wildlife species were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measure BIO-1 and BIO-2**was required or included, and the impact level would be **less than significant with mitigation**.

Threshold e. Would the proposed project substantially 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, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

The proposed project would replace the Clay Street Bridge and realign Clay Street. These activities would not result in the conversion of vacant or undeveloped land to urban uses that would cause the degradation of 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, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species. As discussed in **Threshold a**, the proposed project could result in impacts to migratory birds and raptors during construction activities. Mitigation Measures would be required to reduce construction impacts. Upon construction completion, the proposed project area would operate similarly to existing conditions, thus operations of the proposed project would not result in a reduction of number or restriction oof range for a federal or State listed endangered, rare, or threatened species. No additional impacts beyond those described in **Threshold a** would occur, but as such is a potentially significant impact and mitigation would be required.

MITIGATION MEASURES

Implement **Mitigation Measure BIO-1** and **BIO-2**.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding substantially degrading the quality of the environment were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measures BIO-1** and **BIO-2** were required or included, and the impact level would be lowered to **less than significant with mitigation**.

4.3.6 Cumulative Impacts

As discussed above, there would be no impact with respect local policies or ordinances or habitat conservation plans. Therefore, the proposed project would not cause or contribute to any significant cumulative effect to these areas. The potential for the proposed project to cause or contribute to a potential significant cumulative impact with respect to the remaining Biological Resources-related thresholds is evaluated below.

Cumulative effects of multiple projects are caused by the incremental impact of a proposed project in combination with the impacts of other closely related past, present, and reasonably foreseeable probable future projects. **Section 3.6, Cumulative Projects, Table 3.6-1** provides a list of past, present, and reasonably foreseeable future projects that are considered as part of the cumulative impact analysis within this EIR and are within the City limits. Impacts on biological resources are primarily the result of urbanization, habitat fragmentation, water pollution, and conversion of natural land to agricultural uses.

The proposed project could affect special-status plant and wildlife species, including migratory birds and raptors. Pre-construction surveys for species and implementation of measures, as identified in **Mitigation Measures BIO-1 through BIO-2** would reduce project impacts to a less than significant level. Housing and commercial development planned within the City limits included as cumulative projects also could result in effects to special-status plant and wildlife species, as well as migratory birds and raptors, and could result in potential impacts to these species. These projects would mitigate impacts on special-status plant and wildlife species, ensuring that impacts on these species would be less than significant with mitigation. Additionally, the proposed project, like all other development activities in the cumulative study area, would be required to comply with State and federal law to implement project-level mitigation measures for impacts to special-status plant and wildlife species, including migratory birds and raptors. This regulatory structure would reduce the incremental contribution of the proposed project to any potential cumulative impact. Therefore, the proposed project impacts would not be cumulatively significant.

The proposed project would result in a direct, permanent impact on 0.04 acre of valley foothill riparian habitat and 0.01 acre of montane hardwood-conifer forest habitat. The cumulative planned within the City limits could involve potential impacts to riparian habitats and other sensitive communities within in the Placerville area, including valley foothill riparian and montane hardwood-conifer forests. Implementation of mitigation described in **Mitigation Measure BIO-3** would reduce the proposed project-specific

impacts to a less than significant level. Additionally, the proposed project, like all other development activities in the cumulative study area (refer to **Table 3.6-1**), would be required to comply with State and federal law to preclude or mitigate for impacts and provide BMPs during construction. This regulatory structure would reduce the incremental contribution of the proposed project to any potential cumulative impact. Therefore, the proposed project impacts would not be cumulatively significant.

The proposed project would result in a direct, permanent impact on approximately 0.001 acre of intermittent stream. Implementation of avoidance and minimization efforts and restoration/compensatory mitigation described in **Mitigation Measure BIO-3** would reduce the proposed project-specific impacts to a less than significant level**.** Cumulative projects described in **Table 3.6-1** could potentially impact wetlands or Waters of the U.S. within the City boundaries that are within the same watershed as the proposed project. However, like the proposed project, these cumulative projects would each be required to comply with State and federal law and permits to restore or mitigate for impacts. This regulatory structure would reduce the incremental contribution of the proposed project to any potential cumulative impact. Therefore, the proposed project impacts would not be cumulatively significant.

The proposed project would not reduce wildlife movement potential because no permanent improvements are proposed within Hangtown Creek that would create physical barriers to dispersal. The culverted section of Cedar Ravine Creek would continue to allow flow into Hangtown Creek. Therefore, the proposed project would not contribute substantially to the significant cumulative impact.

The proposed project would replace Clay Street Bridge and realign Clay Street to form a new intersection with Main Street and Cedar Ravine Road. These activities would not result in the conversion of vacant or undeveloped land to urban uses that would result in loss or fragmentation of habitat. The BSA does not constitute a critical or sensitive habitat resource in the context of the cumulative setting area, and therefore construction would not contribute to any cumulative impact. Overall, the proposed project's contribution to potential impacts on biological resources would be less than cumulatively considerable.

4.4 Cultural Resources

4.4.1 Introduction

This section of the Recirculated Environmental Impact Report (EIR) provides contextual background information on historical resources in the project site, including the area's prehistoric, ethnographic, and historical settings for the Clay Street Bridge Replacement Project (proposed project). This section also summarizes the results of cultural surveys of the project site, analyzes the project's potential impacts on cultural resources, and identifies mitigation measures to address adverse impacts. This section is based on the Historic Property Survey Report (HPSR), Historical Resources Evaluation Report (HRER), and Archaeological Survey Report (ASR) (PAR 2019a-2019d). The cultural evaluations were conducted in compliance with California Public Resources Code (PRC) Section 5024.1 to identify archaeological or historical resources in the area of potential effect (APE) and analyzed the proposed project impact areas.

For the purposes of the California Environmental Quality Act (CEQA), "historical resources" generally refer to cultural resources that have been determined to be significant, either by eligibility for listing in state or local registers of historical resources, or by determination of a lead agency (see definitions below). Historical resources can also include areas determined to be important to Native Americans that qualify as tribal cultural resources as defined in PRC Section 21074 (sites, landscapes, historical, or archeological resources).

4.4.2 Cultural Resources Terminology

Below are definitions of key cultural resources terms used in this section:

- **Archaeological Site:** A site is defined by the National Register of Historic Places (NRHP) as the place or places where the remnants of a past culture survive in a physical context that allows for the interpretation of these remains. Archaeological remains usually take the form of artifacts (e.g., fragments of tools, vestiges of utilitarian, or non-utilitarian objects), features (e.g., remnants of walls, cooking hearths, or midden deposits), and ecological evidence (e.g., pollen remaining from plants that were in the area when the activities occurred). **Prehistoric archaeological sites** generally represent the material remains of Native American groups and their activities dating to the period before European contact. In some cases, prehistoric sites may contain evidence of trade contact with Europeans. **Ethnohistoric archaeological sites** are defined as Native American settlements occupied after the arrival of European settlers in California. **Historic archaeological sites** reflect the activities of nonnative populations during the Historic period.

- **Area of Potential Effect (APE) (also referred to as cultural resources study area or study area):** The geographic area or areas within which a project may

directly or indirectly cause alterations in the character or use of significant historical or archaeological resources. The APE is influenced by the scale and nature of a project as well as by the types of cultural resources in the vicinity. For the purposes of this REIR, the proposed project's APE was established in conformance with the Section 106 Programmatic Agreement (PA) Section VIII. A, and it includes the **Area of Direct Impact (ADI)**, the assumed-eligible Placerville Main Street Historic District, the Bedford Avenue-Clay Street Historic Residential District, and the Cedar Ravine Historic Residential District (). It encompasses an area extending 4,333 feet north-south by 2,688 feet east-west totaling 74.67 acres and centered on Main Street in downtown Placerville, California. Also included within the APE are architectural and archaeological resources, including the existing Clay Street Bridge, Druid Monument, Cedar Ravine culvert, Hangtown Creek Retaining Walls, and the Ivy House archaeological deposits.

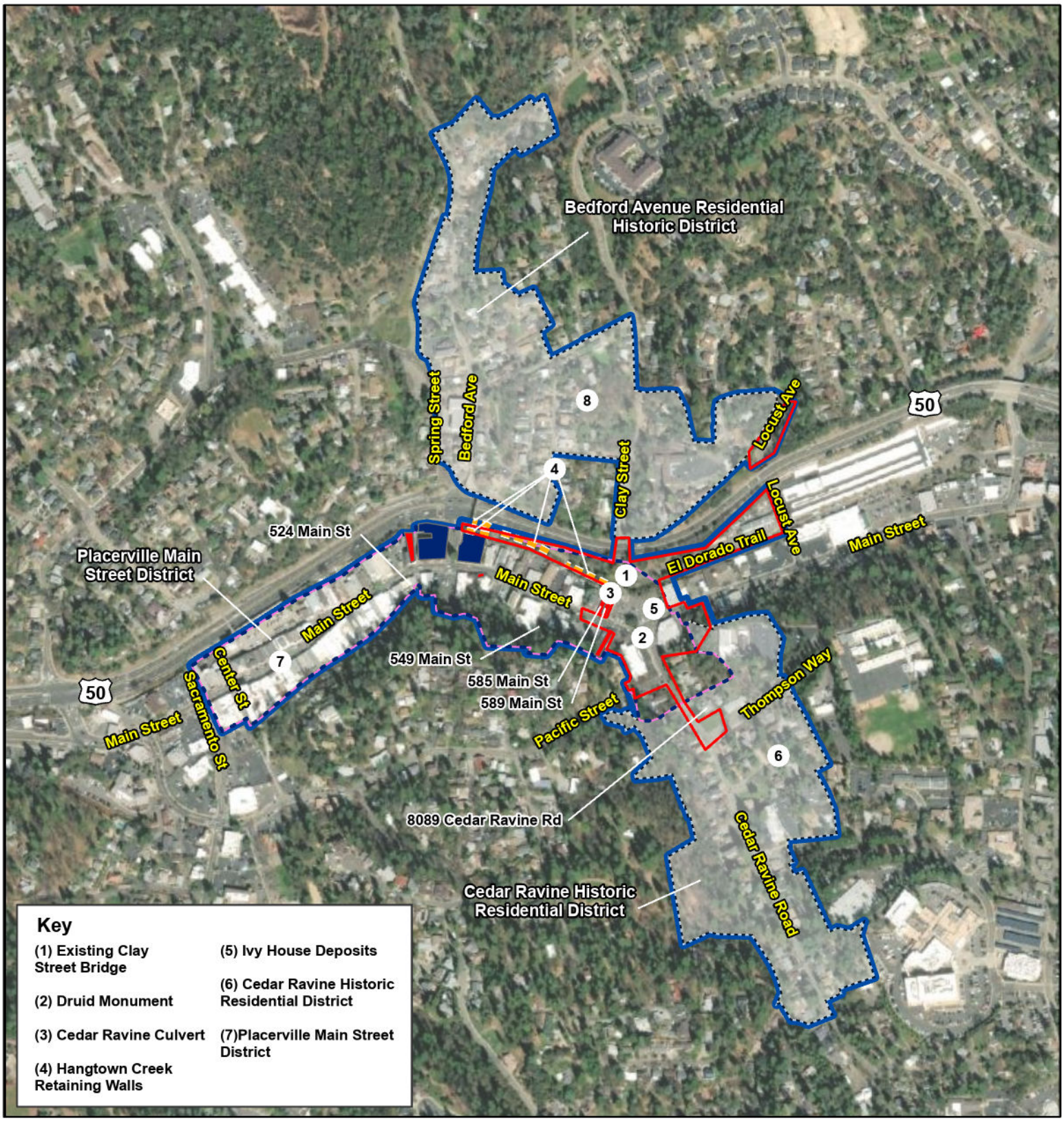
- **Artifact:** An object that has been made, modified, or used by a human being.

- **Cultural Resource:** A cultural resource is a location of human activity, occupation, or use identifiable through field inventory, historical documentation, or oral evidence. Cultural resources include archaeological resources and built environment resources (sometimes known as historic architectural resources), and may include sites, structures, buildings, objects, artifacts, works of art, architecture, and natural features that were important in past human events. They may consist of physical remains or areas where significant human events occurred, even though evidence of the events no longer remains. Cultural resources also include places that are considered to be of traditional cultural or religious importance to social or cultural groups.

- **Ethnographic:** Relating to the study of human cultures. "Ethnographic resources" represent the heritage resource of a particular ethnic or cultural group, such as Native Americans or African, European, Latino, or Asian immigrants. They may include traditional resource-collecting areas, ceremonial sites, value-imbued landscape features, cemeteries, shrines, or ethnic neighborhoods and structures.

- **Historical resource:** This term is used for the purposes of CEQA and is defined in the CEQA Guidelines Section 15064.5 as: (1) a resource listed in, or determined to be eligible for listing in the California Register of Historical Resources (CRHR); (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g);

Proposed Project Area of Potential Effect (APE)



Clay Street Bridge Replacement Project

Figure 4.4-1

0 600 Feet

N

Legend

- Area of Potential Effects (APE)
- Area of Direct Impact (ADI)
- Placerville Main Street District
- Other Residential Districts
- Listed in NRHP
- Listed in CRHP
- Formally Determined Eligible for NRHP
- Potentially Eligible for CRHP
- Linear Resources

Dewberry

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and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Historical resources may also include tribal cultural resources including sites, features, places, cultural landscapes, sacred places, objects, and/or archeological resources with value to a California Native American Tribe per PRC Section21074. For the purposes of this REIR, the proposed project also includes **Assumed Eligible Historic Resources** which are defined in the Caltrans Section 106 PA Stipulation VIII.C.4 as resources considered eligible for the NRHP for the purposes of an undertaking when special circumstances preclude their complete evaluation, such as restricted access, large property size, or limited potential for effects. Assumptions of Eligibility are subject to Caltrans Cultural Studies Office (CSO) approval.

- **Holocene:** Of, denoting, or formed in the second and most recent epoch of the Quaternary period, which began 10,000 years ago at the end of the Pleistocene.

- **Isolate:** An isolated artifact or small group of artifacts that appear to reflect a single event, loci, or activity. Isolates typically lack identifiable context and thus have little interpretive or research value. Isolates are not considered to be significant under CEQA and do not require avoidance mitigation (Pub. Resources Code 21083.2 and CEQA Guidelines Section15064.5). All isolates located during the field effort, however, are recorded and the data are transmitted to the appropriate California Historical Resources Information System (CHRIS) Information Center.

- **Lithic:** Of or pertaining to stone. Specifically, in archaeology, lithic artifacts are chipped or flaked stone tools, and the stone debris resulting from their manufacture.

- **Native American sacred site:** An area that has been, or continues to be, of religious significance to Native American peoples, such as an area where religious ceremonies are practiced or an area that is central to their origins as a people.

- **Pleistocene (Ice Age):** An epoch in the Quaternary period of geologic history lasting from 1.8 million to 10,000 years ago. The Pleistocene was an epoch of multiple glaciation, during which continental glaciers covered nearly one fifth of the earth's land.

- **Prehistoric period:** The era prior to 1772. The later part of the prehistoric period (post-1542) is also referred to as the protohistoric period in some areas, which marks a transitional period during which native populations began to be influenced by European presence resulting in gradual changes to their lifeways.

- **Quaternary Age:** The most recent of the three periods of the Cenozoic Era in the geologic time scale of the International Commission on Stratigraphy (ICS). It follows the Tertiary Period, spanning 2.588 ± 0.005 million years ago to the present. The Quaternary includes two geologic epochs: the Pleistocene and the Holocene Epochs.

- **Stratigraphy:** The natural and cultural layers of soil that make up an archaeological deposit, and the order in which they were deposited relative to other layers.

4.4.3 Environmental Setting

The proposed project is located in the western portion of El Dorado County (County), within the City of Placerville (City), situated within the foothills forming the lower western slope of the Sierra Nevada mountain range. The proposed project APE is on both the south and north sides of Hangtown Creek, which is within the watershed of the South Fork of the American River. The southern portion of the APE extends into the lower part of Cedar Ravine. The APE is located at approximately 1,870 feet above mean sea level.

During the Holocene and historically, much of the Sierra Nevada mountain range foothills and Sacramento Valley were inhabited by several large game mammals including black-tailed deer (*Odocoileus hemionus*), tule elk (*Cervus elaphus nannodes*), pronghorn (*Antilocapra americana*), and grizzly bears (*Ursus arctos*). Among the carnivores historically found were coyotes (*Canis latrans*), gray foxes (*Urocyon cinereoargenteus*), raccoons (Procyon lotor), ringtails (Bassariscus astutus), weasels (*Mustela frenata*), badgers (*Taxidea taxus*), skunks (*Mephitis mephitis, Spilogale putorius*), river otters (*Lutra canadensis*), bobcats (*Lynx rufus*), and mountain lions (*Felis concolor*). Abundant lagomorphs (*hares and cottontails – Lepus, Sylvilagus*) and rodents (tree and ground squirrels – *Sciurus, Spermophilus*; chipmunks – *Tamias*; pocket mice – *Perognathus*; kangaroo rats – *Dipodomys*; gophers –*Thomomys*; beaver – *Castor canadensis*; wood rats – *Neotoma*; cricetid mice and voles –*Reithrodontomys, Peromyscus, Microtus*; and porcupines: *Erethizon dorsatum*) were also found.

4.4.3.1 Prehistoric Background

North-Central Sierra Nevada cultural chronology is divided into four patterns: Late Pleistocene (12,000 to 10,000 years before present [BP]), Early Holocene (10,000 to 7000 BP), Archaic (8000 to 3200 BP), and Sierran (4000 BP). Paleo-Indian peoples

appear to have formed relatively small groups, were highly mobile, and settled around wetlands (e.g., lakes and rivers) where large game congregated. There is no convincing evidence indicating the American River watershed was occupied during the Late Pleistocene. Cultural remains assigned to this time occur at the Rancho Murieta sites, located approximately nine miles east of Sacramento. A general warming trend at approximately 10,000–7000 BP resulted in the drying of Pleistocene lakes and wetlands, and a shift in habitat distributions during the Late Pleistocene. In the western Sierra Nevada mountain range foothills, remnant wetlands persisted longer, becoming focal points for use of land and resources. In the Archaic Period, land use was probably associated with a highly mobile lifeway. Sites from this period seem to have mainly experienced short-term seasonal use, with permanent villages or occupation sites apparently lacking.

After approximately 4000 BP (Sierran Pattern), the climate became cooler and wetter. Regional land use increased in the American River watershed. A primary causal factor was increasing familiarity and a resultant focus on exploitation of a broad range of Sierran plant and animal resources. During the Early Sierran, seasonal base camps were situated in prime locations, and small family-based groups appear to have moved from camp to camp. Middle Sierran land use in the Sierra foothills was characterized by irregular occupation, ephemeral site use, lower population numbers and density, and signs of social disruption. The Late Sierran Period was characterized by intensive land use of the Sierra foothills in which there was widespread, active trade, permanent settlements in some areas, and large populations. The ethnohistoric pattern of land use was probably established at this time (600–150 BP) (PAR 2019c).

4.4.3.2 Ethnographic Background

The APE is situated in the ethnographic territory of the Nisenan, also referred to as the Southern Maidu. Nisenan territory extended across the watersheds of the Yuba, Bear, and American Rivers and the lower watershed of the Feather River. The neighboring Miwok, whose main territory was south of the Cosumnes River, occupied the southernmost part of Southern Nisenan territory. It extended from a few miles south of the confluence of the American River with the Sacramento River to the Cosumnes River.

A Southern Hill Nisenan tribelet occupied the area located between the Cosumnes River and the South Fork of the American River north of the City. The tribelet had strong affiliations with groups living along the lower drainages and ridges of the American River. Archaeologists have placed two ethnohistoric Nisenan/Southern Maidu villages near Placerville: Ekelepakan and Indak.

The Nisenan established permanent villages along stream and river courses and on gentle slopes with a southern exposure. Large populations were concentrated along the banks of major waterways, streams, sloughs, and wetlands. Hill Nisenan villages

often were located on ridges and large flat areas adjacent to watercourses. Fishing, plant gathering, and hunting formed the basis of Nisenan subsistence (PAR 2019c).

The Nisenan relied on resources within the small drainages and gentle ridges that characterize the canyon in which the City is located for hunting, fishing, and gathering foodstuffs, while encamped on the gentle terraces above present-day Hangtown Creek (Placerville 1989: X-1).

4.4.3.3 Historic Background

Jedediah Smith was one of the earliest Euro-Americans to visit the Placerville area. In May 1827, Smith and his party attempted to cross the Sierra Nevada mountain range by way of the American River watershed, following the approximate route of U.S. Highway 50 (US 50), passing through the vicinity of the City.

Starting in 1839, John A. Sutter was the first to develop land granted in the Sacramento Valley as part of the inland frontier that the Mexican government wanted stabilized. The site for Sutter's colony, New Helvetia, was located on a knoll approximately four miles east of the Sacramento River, and by 1841, Sutter had built an adobe fort on the knoll. During the autumn of 1847, a mill was built on the South Fork of the American River at the site of present-day Coloma in El Dorado County, approximately five miles north of the City. On January 24, 1848, while inspecting the tail race and adjacent streambed, James Marshall, the mill's superintendent, discovered gold (PAR 2021c).

Prior to 1847, there was little or no contact between Native Americans and Euro-Americans in the vicinity of the South Fork of the American River. By 1850, however, conflicts arose, and the Native Americans living closest to gold-bearing streams, including those in present-day Placerville, were the hardest hit. Their patterns of subsistence had been disrupted and diseases never known to them decimated entire villages (Placerville 1989: X-1).

The Marshall gold discovery quickly produced a massive influx of settlers into California. In a short period of time, small, often short-lived, mining camps dotted the landscape along the western slope of the Sierra Nevada mountain range (from Downieville/Sierra City in the north to Mariposa/Coarsegold in the south). The Gold Rush produced profound effects on the development of early American Period transportation, mercantilism, and commerce in California. Initially, costs associated with these activities were high, lowering as locally produced and outside goods and commodities entered the California marketplace. Through the 1860s and 1870s, mining diminished in importance in California, with agriculture increasingly assuming a dominant role (PAR 2019c).

As the site of the initial gold discovery, the County was an early focal point of settlement. After the boom of the early 1850s, mining declined in importance, and by

the 1880s, agriculture, ranching, and lumber production became the predominant economic activities in the county (PAR 2019c).

PLACERVILLE HISTORY

During the Gold Rush, the County and City were early focal points of mining activities. In 1848, the first gold discoveries were made along Hangtown Creek, near Cedar Ravine, with miners using gold pans and rockers/cradles. Cedar Ravine was the first Placerville ravine worked for gold, producing over $1 million in gold. Placerville, initially known as Old Dry Diggings and Hangtown, began as a thriving mining camp and quickly grew. During 1851, miners began digging into hills to recover gold-bearing gravels. A number of tunnels were driven into the hills along Cedar Ravine. Sluices were introduced, and ditches and flumes built to supply them with water. Placer mining continued during 1852, and quartz mining started with limited initial success. Construction began on the South Fork Canal to bring water for placer mining. During 1853, placer mining continued, along with construction of the South Fork Canal. In May 1854, the community was incorporated, and became the County seat in 1857. Also, in 1854, hydraulic mining began. Tunnel mining was revived, with the Cedar Springs tunnel the scene of hydraulic mining. Quartz mining became important, with construction of stamp mills to process ore. Placer mining declined but was still pursued along Hangtown Creek and Cedar Ravine (PAR 2019c).

From its founding, the City was a north-central Sierra Nevada mountain range foothill transportation nexus, and the City became a major western terminus for a succession of transportation modes. During the nineteenth century, these included the Pony Express and Overland Stage. By 1880, the local economy had transitioned from mining to logging and agriculture. In April 1888, the Central Pacific Railroad completed a branch line from Folsom to Placerville. During the early twentieth century, automobiles became a major means of transportation from one part of the country to another. The first major transcontinental highway in the U.S. was the Lincoln Highway, which followed existing roads in the eastern U.S. and emigrant trails and wagon roads through the western U.S. The idea for the Lincoln Highway began in 1912 as a vision of Carl G. Fisher, a founder of the Indianapolis Motor Speedway. During 1913, the Lincoln Highway route was established through Placerville down Main Street. In the mid-1920s, it became U.S. Highway 50 (US 50). By 1930, US 50 was fully completed, following construction of the Utah segment (PAR 2019c).

After its redesignation in 1925 as US 50, its route through the City continued to be along Main Street. During the late 1920s and 1930s, much of the winding, narrow roadway between Lake Tahoe and Placerville was reconstructed. Further improvements and realignments occurred during the decade after World War II. These included construction of an expressway through the City by 1955, bypassing the highly congested Main Street route. The 1.5-mile route generally followed the course of Hangtown Creek north of Main Street. Construction of this portion of US 50 included movement or destruction of a number of buildings and facilities, elimination of portions

of several streets, excavation of immense amounts of soil, and utility relocations (PAR 2019c).

CLAY STREET-MAIN STREET-CEDAR RAVINE NEIGHBORHOOD

By 1853, several businesses in the City were located at or in the immediate vicinity of the intersection of Main Street and Cedar Ravine Road. On the southeast corner was the Methodist Episcopal Church. At the southwest corner was Dolton's Fountain House. Along the south side of Main Street west from the Fountain House were the Johnson and Griffin houses, the Miller blacksmith shop, and the Vance house and livery stable. Along the north side of Main Street across from Cedar Ravine Road was the Cedar Ravine House, N. C. Fassett's store, and Burns and McBride's store. Carpenters G. J. and J. E. Cole had their shop above the Cedar Ravine House (PAR 2019c).

A major fire on July 6, 1856, destroyed the Cedar Ravine Hotel, William L. Hale's grocery store, and a few small buildings east of the hotel. On the south side of Main Street, the Vance house and livery stable were consumed. Also destroyed were J. McPearson's syrup factory, the Old Fountain Hotel, which was being used as a grocery, and a blacksmith's shop on Cedar Ravine Road. The fire reached its limit at Cedar Ravine near the Methodist Episcopal Church (PAR 2019c).

By 1862, Burns and McBride's grocery store had relocated west to the north side of Main Street on the plaza. W. S. Burns had a house on Main Street near Cedar Ravine Road. George and James Vance, teamsters, lived on Main Street (PAR 2019c).

After the 1856 fire, in the late 1850s to early 1860s, the area around the intersection of Main Street, Cedar Ravine Road, and ultimately Clay Street was occupied by a jumble of saddler's shops, butcher shops, and so forth. The rains, flooding streams, and mining activities, resulted in 4-foot-square holes that were up to 4 feet deep within the streets. E. L. Parker consolidated a number of small lots into a large lot; during 1864, he built the three-story brick Central House on the corner of Main Street and Clay. The luxurious hotel was first operated by George Congdon (PAR 2019c).

Sanborn Insurance Maps dating from 1891, 1895, 1899, 1910, and 1910–1940 depict progressive changes to the Main Street-Clay Street-Cedar Ravine Road neighborhood. During this 50-year period, the western part of the Clay Street parking lot contained the Ivy House. Built in 1864, the Ivy House, originally known as the Upper Central House, was at the northeast corner of Main Street and Clay Street. During its century of existence, the Ivy House served many roles. From 1871 to 1894, it housed the Placerville Academy, headed by E. B. Conklin. After 1894, the Ivy House was again a hotel, bar, and restaurant. In 1962, before the Ivy House was demolished, the Native Daughters of the Golden West placed two historical markers at its site. Although the structure no longer exists, and has been turned into a paved parking lot, the area is called the Ivy House parking lot (PAR 2019c).

Between 1891 and 1910, the area east of the Ivy House lacked structures. The 1940 Sanborn Map reveals that a service station (with an associated underground storage tank for gasoline) was present just east of the Ivy House. A motel with 15 rooms was located along the east side of what is now the Ivy House parking lot. At some point, Cedar Ravine was placed in an underground culvert, which runs from Pacific Street along Cedar Ravine Road, under Main Street and cuts diagonally across the west-central portion of the Ivy House parking lot to outfall into Hangtown Creek, immediately west from the south end of the current Clay Street Bridge (PAR 2019c).

In 1891, along the west side of Clay Street, there was a large lot with a small building in the southwest corner facing Main Street. By 1895–1899, this building was gone, replaced by a larger building with a small building to its northeast. Both were located away from the street along the lot's west side. In 1910–1940, in addition to the 1895–1899 structures, a building fronted Clay Street, with a smaller structure to the north (PAR 2019c).

At the southeast corner of Main Street and Cedar Ravine Road, the Methodist Episcopal Church was present from 1891 to 1910–1940, renamed the El Dorado County Federated Church by 1940. The 1891 and 1895 Sanborn maps depict a small structure just northeast of the church. By 1899, this small building was next to a larger, irregularly shaped structure, also present on the 1910 and 1910–1940 maps (PAR 2019c).

The 1891, 1895, 1899, and 1910 Sanborn Maps depict Blair's Lumber Yard at the southwest corner of Main Street and Cedar Ravine Road. It occupied a large lot extending south from Main Street along the west side of Cedar Ravine Road to Pacific Street. By 1910–1940, the complex had become the Diamond Match Lumber Company. A large structure housed a mill at the corner of Cedar Ravine Road and Pacific Street. Along the south side of Main Street west of the lumber yard complex, the 1891, 1895, 1899, 1910, and 1910–1940 Sanborn Maps show a complex of adjoining buildings. Through time, these housed various businesses and offices or were used for storage (PAR 2019c).

4.4.3.4 Cultural Resources

The following describes the cultural resources within the APE and an evaluation for historic significance. Cultural resources include archaeological resources and built environment resources (sometimes known as historic architectural resources), and may include sites, structures, buildings, objects, artifacts, works of art, architecture, and natural features that were important in past human events.

These resources include resources either listed in the or determined eligible for listing in the NRHP or CRHR, or have been assumed eligible for the NRHP through Caltrans' NEPA process for the proposed project. The City, as lead agency under CEQA, is required to evaluate resources for significance under Section 15064.5(a) of the CEQA Guidelines, and it is not required to obtain concurrence from the State Historic

Preservation Officer (SHPO) for its historic resource significance determinations. For completeness, in the interest of public disclosure, and to inform the decision-making process, this section is a summary of the cultural resource evaluations completed for the proposed project. Detailed evaluation information can be found in the documents referenced under each resource and listed in the **Section 4.4.5, Methodology,** below.

CLAY STREET BRIDGE

Clay Street Bridge (25C-0117) is a one-lane, closed-spandrel, reinforced-concrete arch bridge over Hangtown Creek (**Photo 4.4-1**). The Clay Street Bridge is approximately 32 feet long and 17 feet wide on spread footings and is skewed 99 degrees to Hangtown Creek. The concrete deck has low guard rails with a rounded concrete top. Various utilities are carried across the creek through conduits attached to the bridge. The southeast wall wraps east above a drop-off into the creek below. It also connects south of Clay Street with a mortared rock of similar height. The northeast abutment was reinforced at some point in time with the addition of concrete-filled sandbags to prevent erosion (PAR 2019b).

The existing Clay Street Bridge replaced the original timber stringer with a wood deck set upon rubble-stone abutments. The bridge is built on remnants of the rubble-stone, as evidenced in the north abutment. The closed-spandrel arch bridge is the most basic of the reinforced concrete bridge types. This bridge, however, is slightly unusual in that its structure is combined with the outfall of the sunken Cedar Ravine culvert into Hangtown Creek. The culvert opening is located at the south end of the Clay Street Bridge's western abutment (PAR 2019b, 2021).

The original Clay Street Bridge was damaged by high waters and a new bridge was proposed. At a meeting of the City Council in April 1919, "Plans were submitted by F.F. Fisher and A.S. Lyon for a bridge over Hangtown Creek at the Clay Street crossing, arch plans of the former being adopted. The clerk was instructed to advertise for steel and concrete for the structure". On April 26, 1919, "Jas. B. Blair was awarded a contract for the concrete and sand [and to] Geo. Rieber & Son for the steel" (Nayyar 2020).



Photo 4.4-1 – Clay Street Bridge, Looking North

The precise construction date of the existing Clay Street Bridge is unknown. The bridge is shown on a historical map dated 1928 on file with the City, but it was likely constructed circa 1926 after the construction contracts were awarded.

The Clay Street Bridge was previously evaluated by JRP in 2004 and found to be individually ineligible for inclusion in the NRHP. That determination was partially based on an assumed build date of 1940, which was subsequently revised to an earlier date (circa 1926). The bridge was reevaluated in 2018 by qualified architectural historians for its eligibility for inclusion on the NRHP as part of the HPSR package prepared by Caltrans in conjunction with its NEPA review of the proposed project. It was again found ineligible. As a result, the original Caltrans finding of ineligibility remains valid (PAR 2019b). The SHPO concurred with this determination on February 19, 2020 (OHP 2020) (**Appendix E**).

In 2020, Michael Baker International architectural historians completed an evaluation of the Clay Street Bridge for inclusion in the CRHR (Nayyar 2020). This evaluation also included research about the bridge's builders, James B. Blair Jr. and George Rieber & Son, and engineers, Arthur S. Lyon and Frederick Floyd Fisher, as well as closed-spandrel arch bridges in the County. The evaluation found that the Clay Street Bridge is eligible for listing in the CRHR under Criterion 1, at the local level of significance, and as a contributor to the assumed-eligible Placerville Main Street District for its association with the City's transportation development. It also appears

individually eligible for listing in the CRHR under Criterion 3, at the local level of significance, as the last remaining bridge of its type, period, and method of construction (vehicular, one-lane, closed-spandrel, reinforced-concrete arch bridge). It has a period of significance circa 1926. Its character-defining features include all aspects of the bridge including its substructure (abutments, arches, wingwalls, pier, spandrel walls), superstructure (deck, railings, approaches), and materials (concrete).

DRUID MONUMENT

The Druid Monument (**Photo 4.4-2**) consists of a circular stone pillar mounted on a square base set on a concrete platform of three ascending steps. A variegated orange and red stained-glass flame atop a metal torch is set on the top of the pillar. The west-facing façade of the square base has a plaque affixed that reads, “THE DRUIDS OF CALIFORNIA ERECTED THIS MEMORIAL TO FREDERICK SIEG WHO INSTITUTED THE ORDER IN THIS STATE A.C. 1859. PRESENTED TO THE CITY OF PLACERVILLE SEPT. 5, 1926.” At the bottom right of this elevation, the stand is inscribed with the name of the designer and reads, “J. A. PORPORATO, ARCHITECT.” Originally, small porcelain drinking fountains were affixed to the north and south sides.

The United Ancient Order of Druids (UAOD) was founded by Frederick Sieg as the first California Grove No. 1 of the Order in Placerville in 1859. The UAOD recognized that the Druid Groves were an important part in the lives of Gold Rush–era pioneers as a mutual aid and protection group, providing physical and economic assistance to fellow members and their families.

In 1926, at the height of the popularity and membership numbers of Druidism in the U.S., the Druid Grove No. 1 (the Placerville order) elected to recognize Sieg and his founding of their organization in California. They brought their suggestion to the Grand Grove (the main organization arm of the group in California). The City of San Francisco offered a choice location for a monument in Golden Gate Park, but the Grand Grove thought it more fitting that it be erected in Placerville.



Photo 4.4-2 – Druid Monument

The Druid Monument is located at the end of Main Street, at the Main Street/Cedar Ravine Road intersection, closest to the Union Cemetery and Sieg's final resting place. At the time of construction, the distinctive façade of the Federated Church stood on the east side of Cedar Ravine Road between the monument and the cemetery. The monument's placement in the center of the triangular intersection gave it added prominence, as it historically functioned to regulate traffic, function as a traffic calming feature and was surrounded by open area, enhancing its scale and visibility, and making it a focal point of the intersection (PAR 2019b, 2021).

The Druid Monument was determined eligible for listing in the NRHP by the SHPO on February 19, 2020 (**Appendix E**). The monument was determined eligible as a commemorative object under Criteria A and C, as well as Criterion Consideration F. Under Criterion A, it was determined eligible for its association with the development of traffic control in the City's downtown. Under Criterion C, it was determined eligible as the work of the master architect J. A. Porporato. Criterion Consideration F relates to commemorative properties; the Druid Monument was erected to commemorate Frederick Sieg for establishing the Druid order in California, thus, the monument is considered a commemorative object. The Druid Monument is significant as a commemorative property for its traditional association and its symbolic value. It has become an icon for the Druid organization in California (whose members from throughout the state make annual pilgrimages to the monument). The Druid Monument qualifies as a commemorative object as a pilgrimage site for the Druids, as a recognition of Druid values, and as a highly recognizable landmark in downtown Placerville for the past 90 years. As such, it was determined eligible under Criterion F.

The Druid Monument is included in the "City Historic Resources" list (Placerville 2021). It is identified as a historic monument under Section 8-16-1 (Monuments) of the City Code, and is, therefore, a historical resource as defined by CEQA Guidelines Section 15064.5(a).

CEDAR RAVINE CULVERT

Cedar Ravine was a natural drainage until it was modified into a mining ditch during the historic mining period in the Placerville area. The purpose of the ditch was to carry drainage water away from mines in the Cedar Ravine area to Hangtown Creek. The Cedar Ravine Culvert is an underground feature extending through the APE from the west side of the intersection of Cedar Ravine Road, adjacent to the Druid Monument, from Pacific Street to Hangtown Creek.

Today, the Cedar Ravine Culvert consists of a combination of corrugated metal piping, stacked stone and reinforced concrete box culvert. This culvert consists of a 234-foot-long open culvert along Cedar Ravine Road, which transitions to a combination of a 66-inch-diameter corrugated metal pipe and concrete box culvert for 286 feet from the Main Street/Cedar Ravine Road intersection to the outfall at Hangtown Creek. The culvert outfall is a concrete arch shape incorporated into the existing southern abutment of the Clay Street Bridge.

While the culvert was at one time associated with the historic mining era in the area, it has been substantially altered, no longer conveys its historical-era appearance, and has lost integrity of materials, design, workmanship, setting, feeling, and association. It is, as a result, not eligible for listing on the NRHP (PAR 2019b, 2021), nor has it been determined eligible by SHPO (OHP 2020) as a contributor to the assumed-eligible Placerville Main Street District (**Appendix E**).

Additionally, the Cedar Ravine Culvert is not eligible for listing in the CRHR under Criteria 1, 2, 3, or 4 because it lacks association with a historic context, is not associated with lives of persons important to local, California or national history, is a remnant example of a mining ditch, does not represent the work of a master, and is not likely to yield information important to the prehistory or history of the local area, California or the nation. For these reasons, it is also not a contributor to the assumed-eligible Placerville Main Street District. Therefore, the culvert is not a historical resource for the purposes of CEQA.

IVY HOUSE ARCHAEOLOGICAL DEPOSITS

The Ivy House, as well as other former structures including a gas station and a motel, occupied the current location of the Ivy House parking lot. Six trenches were excavated in 2009 to depths ranging from two to eight feet. Fill materials, presumably from historic-era grading and leveling of the lot, and native soil (sandy silt, gravel, and cobbles) were found. A moderate scattering of historic artifacts and materials dating from circa 1900 to approximately 1940 were found. These included fragmentary and complete glass containers, glass marbles, ceramic fragments, and miscellaneous

metal objects. Construction materials included brick fragments, square nails, iron pipe fragments, electrical cable, and decomposing redwood lumber. There may be as-yet-undiscovered features such as utility lines, filled-in wells, cisterns, privy pits, buried refuse dumps, or others (PAR 2019d).

Buried resources have been found in the Ivy House parking lot during previous investigations. The potential for undiscovered subsurface features would be greatest within or adjacent to the footprints of former historic structures (i.e., the Ivy House and/or the former gas station). As such, they cannot be evaluated for significance at this point of project design. The Ivy House archaeological deposits are a contributor to the assumed eligible Placerville Main Street District (PAR 2021; OHP 2020) (**Appendix E**); therefore, the Ivy House parking lot archaeological deposits are a historical resource as defined by CEQA Guidelines Section 15064.5(a).

ASSUMED-ELIGIBLE PLACERVILLE MAIN STREET HISTORIC DISTRICT

The City has been contemplating a historic district along Main Street in downtown Placerville for nearly 40 years, beginning in 1985, when the City of Placerville Historic Advisory Committee evaluated the district and the buildings within it for potential NRHP eligibility. In 2012, the Placerville Historical Advisory Committee approved a draft "Downtown Placerville Historic District." In February 2014, the Placerville City Council adopted a resolution of intention (ROI 2014-02) to direct staff to initiate amendments to the City's Zoning Map to create the Downtown Placerville Historic District and to add four residential properties to the Cedar Ravine Residential Historic District. As set forth in the ROI, and as directed by Goal G, Section V (Natural, Cultural, and Scenic Resources), Policy 4 of the General Plan, the City intended to designate "the historic section of downtown Placerville as a specific design review area with due concern and respect for businesses and property owner's interests." Related policies from the General Plan Section VII (Community Design) were also referenced, including Policy 3, which encourages creative uses of historic buildings to permit their continued use and existence. It was not the intent of the City to establish a historic district for eligibility or recommending its inclusion on the NRHP or the CRHR.

As delineated by the City in 2012, the draft Downtown Placerville Historic District is generally centered on Main Street and is bordered by US 50 on the north, Main Street/Broadway on the east, an irregularly shaped area south of Main Street, and on the west where Main Street joins Placerville Drive (just beyond the 1906 railroad bridge over Hangtown Creek).

As part of the proposed project's Section 106 evaluations, the boundaries of the assumed-eligible historic district, as depicted in **Figure 4.4-1**, were based on a review of the City's draft Downtown Placerville Historic District map considered for adoption in 2012, ongoing coordination with Caltrans, field work completed by PAR, and input from consulting parties. As explained in the Finding of Adverse Effect (FOAE) (PAR 2021), the boundaries of the assumed-eligible Placerville Main Street Historic District delineated in the HPSR package represent the core assemblage of structures,

buildings, objects, and sites that embody the time periods and themes of a historic district. Resources in the assumed-eligible Placerville Main Street Historic District and the draft Downtown Placerville Historic District include buildings, monuments, landmarks, sites, and other features (PAR 2019a).

Caltrans assumed the Placerville Main Street District as eligible for the purposes of the proposed project under Criteria A, B, and C at a local level of significance dating from 1848 to 1969, as per Stipulation VIII.C.4 of the Section 106 (PAR 2021), and the SHPO has concurred with this finding (OHP 2020)[1] (**Appendix E**); therefore, a historical resource as defined by CEQA Guidelines Section 15064.5(a) for purposes of the proposed project.

HANGTOWN CREEK RETAINING WALLS

The Hangtown Creek retaining walls are located along Hangtown Creek between Clay Street and Bedford Avenue. They are made up of a mixture of concrete, concrete brick, and cobble rock and mortar walls. Within the APE, 200 feet of existing wall (150 feet east of the bridge and 50 feet west of the bridge) is concrete or concrete brick, likely built in conjunction with the Clay Street Bridge in the mid-1920s and reflecting repairs after World War II. An intact, earlier section of the wall (ca early 1900s), built of cement mortared cobbles and rock, is over 600 feet long and located on the north bank of Hangtown Creek between Clay Street and Bedford Avenue (PAR 2019b, 2021).

The Hangtown Creek retaining walls are a contributor to the assumed-eligible Placerville Main Street Historic District, for which Caltrans assumes eligibility for the NRHP, and the SHPO has concurred with this determination (PAR 2021; OHP 2020) (**Appendix E**). Because the Hangtown Creek retaining walls have been assumed eligible for listing in the NRHP as a contributor, they are a historical resource as defined in CEQA Guidelines Section 15064.5(a).

LINCOLN HIGHWAY

Main Street is the original route of the Lincoln Highway through the City after its redesignation as “U.S. Highway 50” in 1925. Further improvements and realignments occurred during the decade after World War II, including construction of an expressway through the City, bypassing the highly congested Main Street route. The

1 As stated by Caltrans, application of Stipulation VIII.C.4 of the Section 106 PA does not require a formal evaluation or inventory of contributors. Under the stipulation, “Caltrans Districts may consider properties as NRHP eligible for the purposes of an undertaking when special circumstances preclude their complete evaluation, such as restricted access, large property size, or limited potential for effects.” This directive allows for an assumption of eligibility without the need to identify level of significance or to identify related themes or developing historical context statements. Each eligible or assumed eligible resource is treated the same under Section 106 regardless of the level of significance.

western end of Main Street maintains its original character-defining elements (fronted on either side by historic structures, narrow sidewalks, and road footprint). While Main Street represents the original route of the Lincoln Highway, it has been widened, reconfigured, repaved, restriped, and otherwise altered numerous times, beginning in the 1960s with the removal of the Federated Church and Ivy House and alterations of the Main Street/Cedar Ravine Road intersection (PAR 2021). The eastern end of Main Street, where the propose project is located, no longer retains the character-defining characteristics present in the western end.

A 2,345-foot section of the Lincoln Highway is a contributor to the assumed-eligible Placerville Main Street Historic District (PAR 2021; OHP 2020) (**Appendix E**). Because this road segment has been assumed eligible for listing in the NRHP under Criterion A for its association with transportation through Placerville as a contributor, it is, therefore, a historical resource as defined by CEQA Guidelines Section 15064.5(a).

ASSUMED-ELIGIBLE BEDFORD AVENUE–CLAY STREET RESIDENTIAL HISTORIC DISTRICT

The locally-designated Bedford Avenue–Clay Street Residential Historic District is one of the original residential areas in the City. The boundaries of the district, which were delineated by the City of Placerville in 1985, extends from Bedford Avenue on the west end to Locust Avenue on the east end (**Figure 4.4-1**). The northernmost portion of the district extends to the intersection of Pleasant Street and Bedford Avenue. The southernmost portion extends along Clay Street to a point just before it crosses under US 50. In 1985, the City Historic Advisory Committee evaluated residential buildings within this district as part of a historic resources inventory. Based on that evaluation, the City recommended that the historic resources evaluated (not all buildings located within the district boundary are historic) were eligible for listing in the NRHP with a period of significance dating from 1860-1930.

As a conservation approach, the Bedford Avenue–Clay Street Residential Historic District was assumed eligible for the purposes of evaluating the proposed project under Criteria A and C at a local level of significance with a period of significance dating from 1860 to 1930 (PAR 2021), as per Stipulation VIII.C.4 of the Section 106 PA. Based on the original 1985 form, Caltrans assumes all of the buildings located within the district are contributing features for purposes of the Section 106 evaluation (PAR 2021), and the SHPO has concurred with this assessment (OHP 2020) (**Appendix E**). Similarly, as reported on the City's Historic Resource Inventory, it appears that all the properties are individually eligible for the NRHP. As such, the City considers the district a historical resource as defined by CEQA Guidelines Section 15064.5(a) for purposes of the proposed project.

ASSUMED-ELIGIBLE CEDAR RAVINE RESIDENTIAL HISTORIC DISTRICT

The Cedar Ravine Residential Historic District is centered on Cedar Ravine Road (see **Figure 4.4-1**). The northern boundary of the district extends to a point just beyond Thompson Way (on the eastern side) and to Pacific Street (on the western side). The

southern boundary of the district extends to Darlington Way. This district is included on the City's Historic Survey Inventory (Placerville 2018a). In 1985, the City Historic Advisory Committee evaluated the district and the buildings within it for potential NRHP eligibility (not all buildings located within the district boundary are historic), stating that all of the houses evaluated in the inventory appear eligible for the NRHP on an individual basis, but that the district did not meet NRHP requirements (Morrelle, Pigg, and Laarveld 1985). The form was used on a local level for planning purposes and was not submitted to OHP, and the district has not been formally determined eligible or listed to either the NRHP. Today, the district is a mix of the few outstanding Victorian-era homes noted below, infill and remodeled homes constructed in the late 1880s to current dates, and vacant lots (PAR 2021).

The Cedar Ravine Residential Historic District was originally assessed by the City as not recommended for listing in the NRHP, but the City's Historical Advisory Committee recommended individual houses as eligible, as noted above. These include 3059 Cedar Ravine Road (Combellack-Blair House) and 3062 Cedar Ravine Road (Blair-Thompson House). These buildings were recommended as eligible under Criteria A (for their importance to exploration and settlement) and C (due to their architecture). No period of significance was provided for these buildings on the historic resources inventory form. The Combellack-Blair House, a Victorian incorporating primarily Queen Anne architectural elements, was listed in the NRHP in 1985 and has a period of significance of 1895, the construction date given on the NRHP form. In the Section 106 evaluation prepared for Caltrans' use, the Cedar Ravine Residential Historic District was assumed eligible for the purposes of the proposed project under Criteria A and C with a period of significance dating from 1851 to 1900, as per Stipulation VIII.C.4 of the Section 106 PA (PAR 2021), and the SHPO has concurred with this assessment (OHP 2020). Therefore, the City considers this a historical resource as defined by CEQA Guidelines Section 15064.5(a) for purposes of the proposed project.

4.4.4 Prehistoric Resources

The results of records searches in 2007 and 2015, along with site surveys in 2008, 2009, and 2016, indicate there is no evidence of known prehistoric-era cultural resources in the areas that would be affected by project construction activities (PAR 2019c; 2021). In 2024, Hangtown Creek with the proposed project APE was surveyed for a City separate sewer line relocation project. One bedrock milling (BRM) feature was located on a high point of a sedimentary outcrop that extended into Hangtown Creek in the APE. No associated artifacts or cultural soils were observed near or within proximity to the site.

4.4.4.1 Tribal and Interested Parties Consultation

Tribal and interested parties' consultation efforts initially began in 2008 but halted soon after due to proposed project delays. In 2016, efforts to contact and identify interested parties began in earnest. Tribes and individuals included on the Native

American Heritage Commission (NAHC) lists, and those contacted in 2008 were notified by email, letter, or telephone calls and informed that the project was beginning again. The National chapter of the UAOD and the County Historical Society were also notified of the proposed project. The City publicly posted a solicitation in December of 2016 and again in 2018. Several additional individuals or groups asked to be included as consulting parties in May of 2018. These consulting parties included the UAOD Placerville Grove 1, the Friends of Historic Hangtown (FOHH), and the Wopumnes-Nisenan MeWuk (WNM). Consultation is on-going and will continue throughout the life of the proposed project. The following is a summary of consultation efforts to date.

The City scheduled in-person consultation meetings on June 6, 2018 at Town Hall with each consulting party group, as well as the Shingle Springs Band of Miwok Indians (SSBMI). Those in attendance to the consultation meetings included City project staff, Caltrans project staff, Dewberry staff, the Druids Grove 1, FOHH, WNM and SSBMI. The purpose of this consultation meeting was to hear concerns that interested tribes and Section 106 consulting parties had with the proposed project. Each tribe/consulting party was given individual meeting time slots.

In early 2019, the City and Caltrans provided interested parties the opportunity to review and comment on the HPSR (PAR 2019a), which includes the HRER (PAR 2019b) and ASR (PAR 2019c).[2] Only the Wopumnes Nisenan-MeWuk tribe and FOHH submitted comments on the documents. The comments, and responses as reviewed by Caltrans, were documented in an attachment to the HPSR (Caltrans 2019). The Wopumnes Nisenan-MeWuk tribe requested ongoing consultation during the project. The FOHH comments focused on the evaluation of the scope of the resources for the NRHP (e.g., individual properties, features, contributors, and districts), the approach to the evaluation and conclusions, and the geographic area covered in the Caltrans-approved HPSR, HRER, and ASR documents, along with NEPA considerations. A draft FOAE was also provided to consulting parties in late 2020 for review and comment. Responses to comments on the draft FOAE were provided in the final FOAE (PAR 2021), prior to its submittal to Caltrans for approval. The final FOAE was approved by Caltrans in May 2021 and submitted to the SHPO for concurrence in June 2021, at which time the final FOAE was also provided to the interested parties. The SHPO issued its concurrence letter to Caltrans on August 31, 2021 (OHP 2021) (**Appendix E**).

2 The HPSR, HRER, and ASR documents were reviewed and approved by Caltrans in May 2019. The HPSR and ASR provided to consulting parties were redacted because they contain confidential information available only to Professional Archaeologists who meet the Secretary of the Interior Standards for Archaeology.

Consulting parties were provided copies of project specific Programmatic Agreement (PA) and Cultural Resources Management Plan (CRMP) on December 29, 2021. The UAOD reviewed the PA/CRMP and sent a letter to the City with their comments. The letter expressed support of the monument relocation, but included concerns about the removal, storage, damage control and reinstallation of the Druid Monument. The UAOD also offered recommendations regarding choice of contractors to move and store the Druid Monument and requested that the City secure and withstand the cost burden of an insurance policy to over any damage repairs, if needed, as well as requesting input regarding the approved safe storage facility for the Druid Monument.

On September 12, 2022, the City and its consultants, Caltrans, and representatives of the Druids met via video conferencing to discuss the project and the UAOD letter. The discussion included obtaining their approval of the proposed project alternative. The UAOD asked to be included in design discussions for the Druid Monument and were assured that as they will be notified throughout the duration of the proposed project.

4.4.5 Regulatory Setting

4.4.5.1 Federal

NATIONAL HISTORIC PRESERVATION ACT

Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations requires Federal agencies, or those they fund or permit, to consider the effects of their actions on the properties that may be eligible for listing or are listed in the NRHP and afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment. To determine whether an undertaking could affect NRHP-eligible properties, cultural resources (including archaeological, historical, and architectural properties and locations of importance to Native Americans) must be inventoried and evaluated for listing in the NRHP.

NRHP EVALUATION CRITERIA

Determining the NRHP eligibility of cultural resources in the project location is guided by the specific context of the site's significance as set out in Section 106 of the NHPA (16 U.S. Code Section 470), as amended. The NHPA authorizes the Secretary of the Interior to expand and maintain a NRHP of districts, sites, buildings, structures, and objects of significance in American history, architecture, archaeology, engineering, and culture. A property may be listed in the NRHP if it meets criteria for evaluation defined in 36 CFR 60.4.

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:

A. that are associated with events that have made a significant contribution to the broad patterns of our history; or

B. that are associated with the lives of persons significant in our past; or

C. that embody the distinctive characteristics of a type, period or method of construction, or that represent the work of a master, or that possess artistic value, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. that have yielded, or may be likely to yield, information important in prehistory or history.

PROGRAMMATIC AGREEMENT (PA) AMONG THE FEDERAL HIGHWAY ADMINISTRATION, THE ADVISORY COUNCIL ON HISTORIC PRESERVATION, THE CALIFORNIA STATE HISTORIC PRESERVATION OFFICER, AND THE CALIFORNIA DEPARTMENT OF TRANSPORTATION

On January 1, 2014, the First Amended Section 106 Programmatic Agreement (PA) among the Federal Highway Administration (FHWA), the ACHP, the California SHPO, and Caltrans went into effect for Caltrans projects, both state and local, with FHWA involvement. The PA implements the ACHP's regulations, 36 CFR 800, streamlining the Section 106 process and delegating certain responsibilities to Caltrans. The FHWA's responsibilities under the PA have been assigned to Caltrans as part of the Surface Transportation Project Delivery Program (23 United States Code [USC] 327).

4.4.5.2 State Plans, Policies and Regulations

CALIFORNIA ENVIRONMENTAL QUALITY ACT STATUTE AND GUIDELINES

CEQA offers Guidelines on determining the significance of impacts to archaeological and historical resources. CEQA states that if a project would have significant impacts on important cultural resources, then alternative plans or mitigation measures must be considered. However, only significant cultural resources (termed "historical resources") need to be addressed. Section 15064.5(a) of CEQA Guidelines generally defines a historical resource as:

- a resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the CRHR;
- a resource listed in a local register of historical resources or identified in a historical resource survey meeting the requirements in PRC Section 5024.1(g); and
- any object, building, structure, site, area, place, record, or manuscript that a lead agency determines is historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the determination is supported by substantial evidence in light of the whole record; or a resource determined by a lead agency to be "historical," as defined in PRC Sections 5020.1(j) or 5024.1.

STATE SIGNIFICANCE CRITERIA

The CRHR was created by an act of the State Legislature in 1970. Under the provisions of that legislation, the following resources are automatically included in the CRHR (PRC Section 5024.1; Title 14 California Code of Regulations (CCR) Section 4852):

- Resources formally determined eligible for, or listed in, the NRHP through federal preservation programs administered by the OHP, including the NRHP program; the Tax Certification program; and the NHPA Section 106 reviews of federal undertakings;
- State Historical Landmarks numbered 770 or higher; and
- Points of Historical Interest recommended for listing in the CRHR by the State Historic Preservation Officer (SHPO).

The CRHR was modeled after the NRHP, and thus has similar eligibility criteria. To be considered eligible for listing on the CRHR under CEQA, a resource must possess integrity and demonstrate at least one of the following criteria (CCR 15064.5):

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important to the prehistory or history of the local area, California, or the nation.

Eligibility for the CRHR also depends on the integrity, or the survival of characteristics of the resource that existed during its period of significance. Eligible historical resources must meet one of the above criteria and retain enough of integrity to convey its period of historical significance. Seven aspects of integrity are evaluated with regard to location, design, setting, materials, workmanship, feeling, and association.

Regional Plans, Policies, and Regulations

CITY OF PLACERVILLE GENERAL PLAN

The following goals and policies from the 1990 General Plan are relevant to natural, cultural and scenic resources. These policies guide the location, design, and quality of development to protect the City's historical and Native American heritage.

Goal G: To preserve and enhance Placerville's historical heritage.

Policy G.1: The City shall set as a high priority the protection and enhancement of Placerville's historically and architecturally significant buildings and sites.

Policy G.2: The City shall encourage all public and private efforts to preserve and promote Placerville's historical heritage for economic benefits associated with increasing tourist trade.

Policy G.7: The City shall promote awareness of the significance of Placerville's historical features through such means as walking tours, a docent program, appropriate monuments, plaques and markers, and pamphlets and interpretive displays.

Goal H: To protect Placerville's Native American heritage.

Policy H.1: The City shall not knowingly approve any public or private project that may adversely affect an archeological site without consulting the California Archeological Inventory at California State University, Sacramento, conducting a site evaluation as may be indicated, and attempting to mitigate any adverse impacts according to the recommendations of a qualified archeologist. City implementation of this policy shall be guided by Appendix K of the State CEQA Guidelines.

CITY OF PLACERVILLE MUNICIPAL CODE

Placerville Municipal Code Section 10-4-10 (Historical Buildings in the City), also referred to as the "Historical Ordinance," establishes the boundaries of the adopted historical districts (Bedford Avenue–Clay Street, Cedar Ravine, Spring Street–Coloma Street, and Sacramento Street– Chamberlain Street) (Placerville 2020). The ordinance applies only to "old and historical buildings in historical districts of the City" with specific reference to "historic-type architecture." This section establishes requirements for building removal and repairs and activities that could affect exterior architecture. There is nothing in Section 10-4-10 that pertains to structures other than buildings. The Clay Street Bridge and associated features are not subject to the requirements of Section 10-4-10, but, as noted above, the Druid Monument is specifically identified as a historic monument under Section 8-16-1 (Monuments) of the Municipal Code.

4.4.6 Methodology and Thresholds of Significance

4.4.6.1 Methodology

The analysis is based on the following studies:

- Historic Property Survey Report (HPSR) for Clay Street Realignment and Bridge (25C-0117) Replacement Project, Placerville, El Dorado County, California (PAR 2019a)
- Historical Resources Evaluation Report (HRER), Clay Street Realignment and Bridge (25C-0117) Replacement Project, Placerville, El Dorado County, California (PAR 2019b)

- Archaeological Survey Report (ASR), Clay Street Realignment and Bridge (25C-0117) Replacement Project, Placerville, El Dorado County, California (PAR 2019c)
- Extended Phase 1 (XPI) Report for the Clay Street Realignment and Bridge (25C-0117) Replacement Project, Placerville, El Dorado County, California (PAR 2019d)
- Finding of Adverse Effect (FOAE) for the Clay Street Bridge (25C-0117) Replacement Project, City of Placerville, California (PAR 2021)
- Programmatic Agreement (PA) and Cultural Resource Management Plan (CRMP) for the Clay Street Bridge (25C-0117) Replacement Project, City of Placerville, California (PAR 2023)
- California Register of Historical Resources Evaluation for the Clay Street Bridge (Nayyar 2020)

4.4.6.2 Thresholds

Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects associated with cultural resources. The following threshold questions are used to evaluate the impacts on cultural resource as established in the Initial Study/Notice of Preparation (IS/NOP) for the proposed project (2014):

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

4.4.7 Project Impacts

Threshold a. Would the proposed project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

Within the APE (**Figure 4.4-1)** there are 14 identified cultural resources (**Table 4.4-1*).*** These include the Druid Monument, the Cedar Ravine Culvert, the Hangtown Creek Retaining Walls, Clay Street Bridge, the assumed-eligible Placerville Main Street Historic District, assumed-eligible Bedford Avenue-Clay Street Historic Residential District (locally designated), assumed-eligible Cedar Ravine Historic Residential District (locally designated), Ivy House archaeological deposits, a portion of the

Lincoln Highway (now Main Street), and five buildings on Main Street that were previously determined individually eligible.

TABLE 4.4.1 CULTURAL RESOURCES WITHIN APE			
RESOURCE NAME (PRIMARY)	ADDRESS/LOCATION	YEAR BUILT	OHP STATUS CODE
Clay Street Bridge, C25-0117	Clay Street Over Hangtown Creek	1926	Determined ineligible for NRHP by consensus through Section 106 process – Not evaluated for CRHR or local listing / Appears eligible for CRHR both individually and as a contributor to a CRHR eligible multicomponent resource through survey evaluation *
Druid Monument	Intersection of Cedar Ravine and Main Streets, Placerville	1926	Individually determined eligible for NRHP by consensus through Section 106 process. Listed in the CRHR. *
Cedar Ravine Culvert	Cedar Ravine to Hangtown Creek	1880s	Found ineligible for NRHP, CRHR or local designation through survey evaluation
Assumed-Eligible Placerville Main Street Historic District	Extends from 487 Main Street to 610 Main Street	Various	N/A (assumed eligible)
Hangtown Creek Retaining Walls	Western portion of APE	1905-1955	Determined ineligible for NRHP by consensus through Section 106 process – Not evaluated for CRHR or local listing.*
Lincoln Highway	Main Street	1913	N/A*
Assumed-Eligible Bedford Avenue-Clay Street Historic Residential District	North of Clay Street underpass under US 50. Extends from Bedford Avenue on the west	Various	N/A

TABLE 4.4.1 CULTURAL RESOURCES WITHIN APE			
RESOURCE NAME (PRIMARY)	**ADDRESS/LOCATION**	**YEAR BUILT**	**OHP STATUS CODE**
	end to Locust Avenue on the east end.		(assumed eligible, locally designated in 1985)
Assumed-Eligible Cedar Ravine Historic Residential District	South of Main Street, centered on Cedar Ravine Road.	Various	N/A (assumed eligible, locally designated in 1985)
Ivy House Archaeological Deposits	In Ivy House Parking Lot, within center of APE and right of Cedar Ravine Road.	N/A	N/A (evaluation pending)
Fountain/Tallman Soda Works	524 Main Street	1853	Individually listed in the NRHP by the Keeper. Listed in the CRHR.*
Pearson's Soda Works	594 Main Street	1859	Individually listed in the NRHP by the Keeper. Listed in the CRHR. *
585 Main Street	585 Main Street	1930	Individually determined eligible for NRHP by consensus through Section 106 process. Listed in the CRHR. *
589 Main Street	589 Main Street	1902	Individually determined eligible for NRHP by consensus through Section 106 process. Listed in the CRHR. *
Combellack Blair House	3059 Cedar Ravine Road	1895	Individually listed in the NRHP by the Keeper. Listed in the CRHR/ Appears eligible for NRHP as a contributor to a NRHP eligible multi-component resource through survey evaluation^

*Assumed to be a contributing element of the assumed eligible Placerville Main Street District.

^Assumed to be a contributing element of the assumed eligible Cedar Ravine Historic Residential District.

CLAY STREET BRIDGE

The Clay Street Bridge is eligible for listing in the CRHR under Criterion 1, at the local level of significance, as a contributor to the assumed-eligible Placerville Main Street Historic District for its association with the City's transportation development. It is also individually eligible for listing in the CRHR under Criterion 3, at the local level of significance, as the last remaining local bridge of its type, period, and method of construction (vehicular, one-lane, closed-spandrel, reinforced-concrete arch bridge). It has a period of significance circa 1926. Its character-defining features include all aspects of the bridge including its substructure (abutments, arches, wingwalls, pier, spandrel walls), superstructure (deck, railings, approaches), and materials (concrete).

The demolition of Clay Street Bridge is a significant adverse change as defined by CEQA Guideline Section 15064.5(b) because the physical characteristics of the historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR would be destroyed. This is a potentially significant impact.

DRUID MONUMENT

The proposed project would affect the existing configuration of Main Street, Clay Street, and Cedar Ravine Road to create a four-way intersection. The City proposes to move the Druid Monument, currently located near the center of the intersection of Cedar Ravine Road and Main Street, up to 45 feet west of its current location to a raised concrete island between the through lane and right turn lane of eastbound Main Street (**Photo 4.4-3**). The Druid Monument would remain located within the intersection with traffic circulating around it, similar to its current setting.



Photo 4.4-3. Rendering of Proposed Location of Druid Monument

The original placement of the Druid Monument was carefully selected by the then Board of Trustees of the City (now referred to as the City Council) and the UAOD. Its original placement in the center of an intersection gave it enhanced visibility and prominence. The current configuration of the triangular intersection happened in the 1960s following the removal of the Federated Church (1961) and Ivy House (c. 1962), allowing improvements of a more “modern” intersection geometry; although the monument remained in its original location, it was situated in the reconfigured triangular intersection and no longer at a prominent central position. It was at this time the drinking fountains were also removed.

Although the proposed new location remains at the intersection of Main Street and Cedar Ravine Road and its original association with the transportation network would not change, the Druid Monument would be placed in a non-centralized location between the through lane and the right turn lane of eastbound Main Street to protect the monument from potential traffic collisions.

In 2006, the Druid Monument was hit by a gravel delivery truck and repaired by the City in 2007 by a contracted granite and stone specialist (approved by City Council on February 13, 2007). As a result of the proposed project, the Druid Monument would be moved out of the direct line of on-coming traffic. Further, the Druid Monument would be rotated 180 degrees to orient the plaque on the monument to face the crosswalk; this would allow for pedestrians and passers-by to stop and read the plaque as they pass the monument without having to leave the crosswalk.

Moving the Druid Monument from its historic location would also change the property’s original intended use as a traffic calming feature, which is a character-defining element of the property (36 CFR 800.5 (a) (2) (iv)). The red flame light at the top of the monument served as a traffic beacon and aided with vehicle navigation. It’s placement in the middle of an irregular intersection created what was essentially a historical traffic calming feature, as well as enhancing the scenic beauty and character of downtown Placerville. Local newspapers attested to the function of the monument for traffic control and safety (PAR 2019b).

Moving the monument from its original location would provide for a more protected location from traffic movements. As a consideration, vehicle size has increased since the monument was first placed and constructed, thus putting it at a higher risk of being damaged by vehicles in its existing location, as occurred in 2006, particularly by delivery trucks and emergency vehicles traveling to and from Marshall Hospital, which is located just south of the Main Street/Cedar Ravine Road intersection.

In addition, this alternative would allow for safe pedestrian access to the monument. Improved access would positively highlight the monument as a valued historical resource for the community and the Druids who make annual pilgrimages to the monument. Rotating the monument would allow the plaque to be more easily viewed

and read by passing pedestrians, making the monument a more accessible feature to educate the public of its history.

Although the new placement of the monument has several advantages, movement of the monument from its historic location would result in a significant effect to the Druid Monument as it would alter the property's historic location (36 CFR 800.5 (a) (2) (iii)); therefore, relocation of the Druid Monument is considered a potentially significant impact.

ASSUMED ELIGIBLE PLACERVILLE MAIN STREET HISTORIC DISTRICT

The assumed-eligible Placerville Main Street Historic District is centered on Main Street in downtown Placerville and is bordered by US 50 on the north, Reservoir Street on the south (western portion), Sacramento Street on the west, and the current Ivy House parking lot on the east. The Placerville Main Street District is assumed eligible as an historic property for the purposes of this proposed project under Stipulation VIII.C.4 of the Section 106 PA on a local level under criteria A, B, and C. The period of significance for this assumed district is 1849 (when the road was developed) to 1969 (50 years before present). There are 55 potentially contributing or contributing elements within the assumed eligible Placerville Main Street District that are significant under the themes of transportation, settlement, commerce, architectural, government and monuments.

Three buildings within the assumed eligible Placerville Main Street Historic District (Placerville City Hall – 487 Main Street, Fountain/Tallman Soda Works - 524 Main Street, and Pearson's Soda Works - 549 Main Street) are listed on the NRHP. Two buildings within the assumed eligible district (585 Main Street and 589 Main Street) have also been determined individually eligible for listing in the NRHP/CRHR through the Section 106 process. Other assumed eligible contributing elements within the assumed district include: the Druid Monument; a 2,345-foot section of Main Street that was originally part of the Lincoln Highway; the Hangtown Creek retaining walls; and the Clay Street Bridge. Although unevaluated at this time due to access limitations, the Ivy House archaeological deposits may be a contributing element to the assumed eligible Placerville Main Street District.

ROADWORK

The proposed project would result in effects (direct and/or indirect) to assumed contributing elements of the assumed eligible Placerville Main Street District: the Druid Monument; Clay Street Bridge; Lincoln Highway (Main Street); Hangtown Creek Retaining Walls; and several buildings. These buildings include J. Pearson Soda Works Building (549 Main Street), the Fountain/Tallman Soda Works (524 Main Street), 585 Main Street, and 589 Main Street.

All project features are proposed to be constructed in the public right-of-way. Paving operations related to re-construction of the Ivy House parking lot would be adjacent to the easternmost building on the north side of Main Street and

approximately 50 feet from the buildings on the south side of Main Street. The original alignment and route of Main Street would not be altered and the existing setting would not change. Vibrations may occur during the proposed project construction near the intersection of Main and Clay streets (adjacent to the Tallman Soda Works) but are not anticipated to exceed acceptable Konan vibration criteria[3] for historic and sensitive buildings.

The proposed project would result in the realignment of a 160-foot-long segment of Clay Street, changing its alignment to angle east through the existing Ivy House parking lot to align with Cedar Ravine Road. Consequently, the realigned road would meet Main Street approximately 180 feet away from these assumed contributing structures. The realignment of Clay Street through the Ivy House parking lot in order to create a four-way intersection with Main Street and Cedar Ravine Road would not adversely affect character-defining elements associated with the assumed eligible Placerville Main Street District, such as a lack of gridded streets or set parcel sizes or platting. The setting of this intersection has already been substantially altered since its original construction, with the removal of the Ivy House and Federated Church in the early 1960s that once flanked Main Street on the east side of Cedar Ravine Road and subsequent reconfiguring of the intersection. Historic Sanborn Fire Insurance Maps (1891 through 1940) also depict a large lumber yard (Blair's and later Diamond Match Lumber Co.) on the southwest corner of the Main Street/Cedar Ravine Road intersection; however, the lumber yard was gone/demolished by the late 1960s. The loss of the majority of historic buildings at this intersection has severely compromised its integrity and affected its ability to convey its significance as part of a larger resource. Therefore, the realignment of approximately 160 feet of Clay Street would not affect the qualities for which the district is assumed eligible, including under the themes of transportation and settlement.

Altering this intersection by realigning Clay Street would not impact the viewshed of the Pearson Soda Works Building (549 Main Street), the Fountain/Tallman Soda Works (524 Main Street), 585 Main Street, or 589 Main Street, and would not substantially alter the view from the western end of the assumed eligible Placerville Main Street Historic District, which is the location of a higher

3 "Vibration Criteria for Historic Buildings" was developed by Walter Konon and John R. Schuring in 1983. This criterion uses the characteristics of the ground motion with regard to frequency, as well as the cause of the vibrations, and therefore allows for a more meaningful evaluation of the vibrations measured and their effects on any historic/sensitive buildings at a given site. This Konon Criteria allows for steady state vibrations up to 0.250 inches/second at frequencies between 40 and 100 hertz (common for vibratory compaction equipment) and transient vibrations up to 0.500 inches/second at the same frequencies (for instances of dynamic compaction, dropping of equipment, etc).

percentage of buildings and elements assumed to contribute to the eligibility of the resource.

The proposed project would result in repaving a portion of Main Street and restriping as necessary. The portion of the former Lincoln Highway in the western end of the assumed-eligible Placerville Main Street Historic District along Main Street maintains its original character-defining elements (fronted on either side by historic structures, narrow sidewalks, and road footprint) and would not be affected by the proposed project. The section of the former Lincoln Highway through the eastern end of the assumed eligible district and within the proposed project limits has been widened, reconfigured, repaved, restriped, and otherwise altered numerous times, beginning in the 1960s with the removal of the Federated Church and Ivy House.

CLAY STREET BRIDGE REPLACEMENT

The proposed project would result in the demolition and replacement of the existing Clay Street Bridge with a structure that would provide two lanes and sidewalks, and would be longer than the existing bridge, necessitating the realignment of a segment of Clay Street as to not encroach onto adjacent properties/structures. The bridge is assumed to contribute to the larger resource because it was built within the assumed period of significance of the assumed eligible Placerville Main Street District and is a transportation feature that provides connectivity to Main Street from neighborhoods north of Hangtown Creek and US 50.

Historic Sanborn Fire Insurance Maps indicate that a bridge has been in this location since at least 1891; therefore, the current circa mid-1920s bridge replaced an earlier bridge at this location. The proposed project includes construction of a new bridge at the same location as the existing structure. Following construction of the proposed project, the new bridge and realigned segment of Clay Street would continue to accommodate two-way traffic and function as a connector between Main Street and neighborhoods on the north side of Hangtown Creek, as originally intended. Consequently, the replacement of the existing Clay Street bridge and realignment of a 160-foot-long section of Clay Street would not adversely affect the assumed character-defining qualities (angled streets, lack of a formal plat, irregular parcel sizes, buildings fronting on Main Street) that contribute to the assumed-eligible district. Proposed project impacts to the monument as an individually eligible historic property are discussed in a separate section above.

Replacement of the Clay Street Bridge would also require replacement of approximately 200 feet of the Hangtown Creek retaining wall on the south side of the creek (the wall is not present on the north creek bank). The section of the existing wall (150 feet east of the bridge, and 50 feet west of the bridge) within the proposed project APE is formed from concrete and was likely built in conjunction with the Clay Street Bridge in the mid-1920s. The existing concrete wall segment within the proposed project limits would be replaced with a new

concrete structure faced with an aesthetic treatment to mimic the existing wall look. While the Hangtown Creek retaining walls are assumed to be contributing elements of the assumed eligible Placerville Main Street District, the section within the proposed project limits is a replacement of the original rock wall and was constructed using materials and design typical of its age. Consequently, the loss of the concrete section of wall within the proposed project limits does not adversely affect the qualities for which the Placerville Main Street District is assumed eligible.

RELOCATION OF DRUID MONUMENT

The Druid Monument is considered a contributing element of the assumed eligible Placerville Main Street District. Following construction, the monument would remain within the Main Street/Cedar Ravine Road intersection, albeit approximately 45 feet west, and would continue to be associated with the eastern end of the assumed-eligible Placerville Main Street Historic District. It would remain in full view of travelers along the road and would retain its imposing height and character. Consequently, relocation of the Druid Monument would not alter the overall eligibility of the assumed eligible district and would not be considered an adverse effect. Proposed project impacts to the monument as an individually eligible historic property are discussed in a separate section above.

In summary, while portions of some of the contributing elements of the assumed eligible Placerville Main Street District would be altered or removed as a result of the proposed project, the overall character defining features of the district (informal platting, varying parcel sizes, historic buildings fronting on Main Street, idiosyncratic feeling as a result of lack of a designed plan) would remain evident following completion of the proposed project. Impacts to the assumed contributing elements during construction are considered a less-than-significant impact.

ASSUMED ELIGIBLE CEDAR RAVINE HISTORIC RESIDENTIAL DISTRICT

The assumed eligible Cedar Ravine Historic Residential District, which is locally designated, is located in the southern portion of the APE and is centered on Cedar Ravine Road. The northern boundary of the district extends to a point just beyond Thompson Way (on the eastern side) and to Pacific Street (on the western side). Today, the district is a mix of the few outstanding Victorian-era homes, infill and remodeled homes constructed in the late 1980s to present, and vacant lots.

Although this district as a whole was originally assessed as ineligible for listing in the NRHP, individual residential houses were recommended by the City as eligible. These include 980 Pacific Street, 3059 Cedar Ravine Road (Combellack-Blair House), and 3062 Cedar Ravine Road. These buildings were recommended as eligible under Criterion A (for their importance to exploration and settlement) and Criterion C (due their architecture). No period of significance was provided for these buildings on the historic resources inventory form. The Combellack-Blair House, a Victorian-era residence incorporating primarily Queen Anne architectural elements, was listed in the NRHP in 1985 and has a period of significance of 1895, the construction date given on the NRHP

form. The Cedar Ravine Historic Residential District is assumed eligible for the purposes of this proposed project under Stipulation VIII.C.4 of the Section 106 PA.

The proposed project currently includes plans to use a vacant lot near the intersection of Thompson Way and Cedar Ravine Road (within the boundaries of the assumed district) as an equipment staging area. Use of the lot for staging would not require ground disturbance or any other modifications. No character-defining elements of the assumed eligible Cedar Ravine Historic Residential District (including the Combellack-Blair House) would be affected by the proposed project. Because no character-defining elements of the assumed-eligible Cedar Ravine Historic Residential District would be adversely affected by the project, impacts would be less than significant.

BEDFORD AVENUE-CLAY STREET HISTORIC RESIDENTIAL DISTRICT

The assumed eligible Bedford Avenue-Clay Street Historic Residential District, which is locally designated, is located in the northern portion of the APE and extends from Bedford Avenue on the west end to Locust Avenue on the east end. The northernmost portion of the district extends to the intersection of Pleasant Street and Bedford Avenue. The southernmost portion extends along Clay Street to a point just before it crosses under US 50.

In 1985, the City Historic Advisory Committee evaluated residential buildings within this district as part of a historic resources inventory. Based on that evaluation, the City recommended that all of the resources evaluated were eligible for listing in the NRHP under Criterion A (for their importance to exploration and settlement) and Criterion C (due their architecture) as “varied as the pioneers that settled here”, with a period of significance dating from 1860-1930. The current condition of the district and its houses has not been assessed. Rather, the Bedford Avenue-Clay Street Historic Residential District is assumed eligible for the purposes of this proposed project under Criteria A and C at a local level with a period of significance dating from 1860-1930, as per Stipulation VIII.C.4 of the Section 106 PA. All of the buildings located within the district are assumed to be contributing features.

The proposed project northern bridge roadway approach would conform to the southern boundary of the district at US 50. Construction equipment may be present along Clay Street within the district boundary during construction to accommodate movement. There would be no change in ownership of the assumed eligible Bedford Avenue-Clay Street Historic Residential District and the duration of the occupancy would be temporary. There would be no construction done directly to the district, so there would be no significant changes to the district. There are no anticipated permanent adverse physical effects nor interference with the purpose of the district. Because no character-defining elements of the assumed-eligible Bedford Avenue–Clay Street Residential Historic District would be adversely affected by the proposed project, impacts would be less than significant.

MITIGATION MEASURES

Mitigation Measure CUL-1: The following measures are recommended to minimize harm and adverse effects to the Clay Street Bridge from the proposed project:

- Prior to removal of the Clay Street Bridge, the bridge shall be formally documented by a professionally qualified architectural historian in the format of a Historic American Engineering Record (HAER) recordation following National Park Service guidelines. The documentation shall meet the "Level II" requirement for content, consisting of measured drawings, large format photographs, and written data that record the significance of the Clay Street Bridge.
- Measured Drawings. Selected existing drawings (including plans, elevations, and selected details), if available, shall be reproduced photographically in accordance with HAER photographic specifications. If existing drawings are not available, detailed drawings (e.g., plans, elevations, and selected details) shall be completed.
- Photographs. Photographs must be large format (4" x 5" negative size) showing the bridge in context as well as details of its engineering features. The photographs shall be produced and processed for archival permanence in accordance with the HAER photographic specifications. Views shall include contextual views, elevation views, and details of the significant design and engineering elements.
- Written Data. The descriptive and historical information contained in the Historical Resources Evaluation Report shall be sufficient to meet the HAER written data requirement.
- The City shall ensure one archival copy of the HAER documentation with photographs is submitted to the El Dorado County Historical Society.
- The City shall ensure one digital copy of the HAER documentation is submitted to the North Central Information Center, the Friends of Historic Hangtown, and other parties as determined by the City or upon request by others.

Timing/Implementation:	*Prior to removal of the bridge*
Monitoring/Enforcement:	*City of Placerville Engineering Department*

Mitigation Measure CUL-2: The following measures are recommended to minimize harm and adverse effects to the Druid Monument from the proposed project.

- *Historic American Building Survey Documentation*. Prior to removal and dismantling of the Druid Monument, the monument shall be formally documented by a professionally qualified architectural historian in the format of a Historic American Buildings Survey (HABS) recordation

following National Park Service guidelines. The documentation shall meet the "Level II" requirement for content, consisting of measured drawings, large format photographs, and written data that document the significance of the Druid Monument.

- Measured Drawings. Selected existing drawings (including plans, elevations, and selected details), if available, shall be reproduced photographically in accordance with HABS photographic specifications. If existing drawings are not available, detailed drawings (e.g., plans, elevations, and selected details) shall be completed.
- Photographs. Photographs must be large format (4" x 5" negative size) showing the Druid Monument in context as well as details of its engineering features. The photographs shall be produced and processed for archival permanence in accordance with the HABS photographic specifications. Views shall include contextual views, elevation views, and details of the significant design elements.
- Written Data. The descriptive and historical information contained in the Historical Resources Evaluation Report shall be sufficient to meet the HABS written data requirement.

- The City shall ensure one archival copy of the HABS documentation with photographs is submitted to the El Dorado County Historical Society
- The City shall ensure one digital copy of the HABS documentation is submitted to the North Central Information Center, The United Ancient Order of the Druids, Friends of Historic Hangtown, and other parties as determined by the City or upon request by others.
- Relocation. Following the completion of the HABS documentation, an individual qualified in the reconstruction/relocation of historic properties similar to the Druid Monument (for example, an architect who specializes in historic preservation), and approved by the City/project engineer, shall design the plan for the removal, dismantling, storage, movement, and reinstallation of the Druid Monument. The plan shall provide for investigating the Cedar Ravine culvert underlying the monument's foundation to ensure its stability prior to dismantling and removing the monument. If the structural stability of the culvert may pose a risk to the monument's removal and dismantling, the plan shall identify the procedures for temporarily stabilizing the culvert until removal and dismantling is completed. This same individual shall be responsible for directing and overseeing the dismantling and reinstallation of the monument. The dedication plaque shall be retained, with additional text documenting the movement of the resource. If this addition cannot be made to the existing plaque, a new plaque of like construction will be placed at the monument.
- The City shall invite the United Ancient Order of the Druids, Grand Grove (UAOD) to be present during the relocation of the monument.

- The City shall invite the United Ancient Order of the Druids, Grand Grove (the Druids) the opportunity to rededicate the monument in its new location.
- The City shall provide electricity to the monument's torch, so that it can be lit in the evenings and continue to function as it was originally intended.
- Decorative and traffic related bollards consistent with design guidelines in the Main Street Streetscape Design Development Plan shall be installed to protect the monument from vehicle traffic.
- The City shall regularly check the monument for signs of vandalism, graffiti, or litter.
- A freestanding interpretive/educational sign shall be erected next to the monument to highlight the monument's original location, why it was moved, its importance to the Druid organization, and its National Register of Historic Places status. The City shall invite the Druids to assist with the creation of the text for the sign.
- An individual who meets Secretary of the Interior Standards as an historian and/or architectural historian shall expand upon and revise the existing write-up on the Druid Monument that is included in the public educational information and tourism, including any self-guided walking tours of Main Street Placerville. The City shall provide interested parties, including the Druids, with an opportunity to review the text prior to it being published.
- The City will engage the services of a monument specialist, with experience with large, historically valuable monuments, to oversee the removal, storage, and relocation of the monument to ensure no damage will occur during the relocation of the Druid Monument.

Timing/Implementation:	*Prior to relocation (HABS documentation on file; contract with qualified consultant to relocate monument); during relocation; after relocation (dedication plaques)*
Monitoring/Enforcement:	*City of Placerville Engineering Department*

Mitigation Measure CUL-3: The following measure will be used to minimize vibrational impacts to historic buildings in the Placerville Main Street District during construction of the proposed project:

- The City shall ensure vibration monitoring is performed during project construction at the existing Clay Street/Main Street intersection to ensure the vibration levels previously recorded by Gasch (2018) are not exceeded such that the project would result in damage to the following buildings: J. Pearson Placerville Soda Works Building (594 Main Street); 582 Main Street (the Stable Building); 585 Main Street; and 589 Main

Street. Construction contracts shall include all required conditions. If the results indicate vibration levels are exceeded, the City shall stop work and implement alternative construction methods recommended by the California Department of Transportation (Caltrans) in its 2013 Transportation and Construction Vibration Guidance Manual to protect the resources. Selected methods shall demonstrate the Caltrans-identified risk of structural damage to historical buildings of 0.1 inches per second peak particle velocity (PPV), or other protective threshold as identified in the analysis, would not be exceeded.

Timing/Implementation:	*Prior to issuance of construction documents for public bidding (vibration restrictions) and during constructing (vibration monitoring)*
Monitoring/Enforcement:	*City of Placerville Engineering Department*

LEVEL OF SIGNIFICANCE

Impacts regarding the project causing a substantial adverse change in the significance of a historical resource were determined to be **potentially significant** without mitigation. Therefore, mitigation measures were required or included.

Removal of the existing Clay Street Bridge and moving the Druid Monument to a new location would still result in a **significant and unavoidable impact** under CEQA because the physical characteristics of the bridge and monument that convey their historical significance and that justify their eligibility for inclusion in the NRHP and/or CRHR would be materially altered. The character-defining elements that contribute to the themes of transportation, settlement, architecture, commerce, government, and monuments in the assumed-eligible Placerville Main Street District (and draft Downtown Placerville Historic District) would still be evident when the proposed project is completed, as compared to existing conditions. Impacts would be **less than significant**.

Overall, the impact level to historic resources would be **significant and unavoidable with mitigation**.

Threshold b. Would the proposed project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Only one known historic archaeological site is located within the APE.

IVY HOUSE ARCHAEOLOGICAL DEPOSITS

The proposed project would result in the realignment of Clay Street through the existing Ivy House parking lot and would require excavations at depths up to three feet to

accommodate drainpipes. Excavation depths for the new alignment of Clay Street through the existing Ivy House parking lot would be approximately 18 inches. Construction in the remaining portion of the parking lot would involve removing the existing asphalt surfacing and repaving the area with new painted striping for parking stalls. Excavation depths for this portion is anticipated to be less than 12 inches.

Previous Extended Phase I testing in the Ivy House parking lot uncovered a moderate scattering of deposits (fragmentary and complete glass containers, glass marbles, ceramic fragments, and miscellaneous metal objects) dating from circa 1900 to circa 1940 within the fill layer, 3.3 to 4.9 feet below the surface (PAR 2019d). Beneath the fill layer, sterile soil was encountered. Ground disturbance associated with the proposed project would only reach a maximum depth of three feet. It is possible that construction may uncover as-yet unobserved intact subsurface features and/or deposits under the fill layer, such as filled-in wells, cisterns, privy pits, buried refuse dumps, and the like.

The potential is high for additional deposits, the significance of which cannot be ascertained until they are encountered during project construction. The Ivy House archaeological deposits are assumed historical resources as defined in CEQA Guidelines Section 15064.5. Because construction of the proposed project has the potential to result in the disturbance of Ivy House archaeological deposits, this is a potentially significant impact.

Additionally, the Ivy House archaeological deposits may be considered a historic property pursuant to Stipulation IX.B of the Section 106 PA. Due to restricted access because of the existing paved parking lot surface, however, a complete evaluation of the entire resource could not be completed. Consequently, Caltrans and the City have developed a project-specific cultural resources management plan that outlines the phased evaluation, assessment of effects, and resolution of adverse effects for the site.

OTHER ARCHAEOLOGICAL RESOURCES

One bedrock milling (BRM) feature was identified during a 2024 survey for a separate City project. The BRM is located on a high point of a sedimentary outcrop. The BRM feature is located in the proposed project APE. No associated artifacts or cultural soils were observed near or within proximity to the site.

The BRM is considered a unique resource because precontact resources are not ultra-common on the landscape, and this site was likely created by, and held significance to, past people, and is significant to local tribes. Demolition and construction activities from the proposed project have the potential to inadvertently affect the BRM. Because construction of the proposed project has the potential to result in the disturbance of the feature, this is a potentially significant impact.

MITIGATION MEASURES

Mitigation Measure CUL-4: The City shall implement the following measures during project construction:

- A preconstruction meeting shall be conducted by a professional archaeologist meeting the qualifications outlined in the Secretary of the Interior's Professional Qualification Standards for archaeology to educate construction contractors about the potential for encountering archaeological resources and next steps if a resource is discovered.
- Archaeological monitoring in the Ivy House parking lot shall be completed by a professional archaeologist meeting the qualifications outlined in the Secretary of the Interior's Professional Qualification Standards for archaeology.
- Archaeological and/or tribal monitoring will be on site during construction activities of that disturb native soil within the vicinity of the BRM in Hangtown Creek. Up to two months prior, and no less than one week prior, to the start of construction activities of native soil, the City will contract with a qualified Archaeological Consultant and/or Tribal /Monitor. Monitors will wear the appropriate safety equipment while on the construction site and will document field-monitoring activities on a monitoring log. The qualified archaeological monitor will be given 24-hour or one business day notice of the start of native soil disturbing activities.
- If prehistoric or historic-period archaeological deposits are discovered during project construction activities at the Ivy House parking lot, or at any location within the project site, all work within 25 feet of the discovery shall be redirected and the archaeologist shall assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Impacts to archaeological deposits should be avoided by project activities, but if such impacts cannot be avoided, the deposits shall be evaluated for their California Register of Historical Resources (CRHR) eligibility. If the deposits are not CRHR–eligible, no further protection of the finds is necessary. If the deposits are CRHR–eligible, they shall be protected from project-related impacts or such impacts mitigated. Mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility. Public educational outreach may also be appropriate.
- The City shall also ensure compliance with any additional measures that are included in the Cultural Resources Management Plan (CRMP) that is being finalized through the NEPA process for the project as it pertains to the Ivy House archaeological deposits and other locations that may be disturbed by project construction.

Timing/Implementation: *During project construction*

Monitoring/Enforcement: *City of Placerville Engineering Department*

Mitigation Measure CUL-5: For the BRM, an Environmentally Sensitive Area (ESA) will be established in consultation with the City, a Tribal Monitor, and the qualified archaeologist consultant along the north bank of Hangtown Creek and delineated on the engineering plans. The fencing will consist of three-foot-high, orange, polyethylene, construction fencing and will extend the full distance of this portion of the BRM plus a 10-foot buffer to ensure the site is not disturbed. This fencing will serve as a clear visual barrier for construction personnel beyond which no project-related activities can occur.

No less than one week prior to the start of construction, the Resident Engineer will contact the City's qualified Archaeological Consultant to assist in the installation of the ESA fencing. The qualified Archaeological Consultant will be given one business day notice of the start of ESA fencing installation. Protective measures include fencing, access restrictions, and specific contractual language. The following actions will be undertaken prior to construction:

- The qualified Archeological Consultant and Certified Tribal Monitor will work closely with the Resident Engineer (RE) and Construction Contractor to educate all involved about potential sensitive precontact resources. A preconstruction field review will be conducted by the archaeological consultant, as well as training for construction personnel;
- The ESA Map will be included in the City's RE's Pending File and clearly marked on all project plans and contract specifications (PS&E) documents; and
- The ESA fencing will remain in place until the construction activities are complete.

In addition to the measures outlined above, construction specifications and engineering plans will include the location of the ESA fencing and the following language:

- Contractor is responsible for protection of the BRM;
- Contractor will advise all construction workers of the location of the BRM and they are required to protect the BRM from an inadvertent damage;
- Prior to construction activities, the City's Archaeological Consultant and Tribal will delineate the ESA for the contractor installation of a three-foot-high orange temporary construction fence with 10-foot buffer around the site; and
- No construction personnel or ride-on machinery will be allowed within the ESA boundary.

Timing/Implementation: Prior and During project construction

Monitoring/Enforcement: *City of Placerville Engineering Department*

LEVEL OF SIGNIFICANCE

Impacts regarding the proposed project causing a substantial adverse change in the significance of an archaeological resource were determined to be **potentially significant** without mitigation. Therefore, mitigation measures were required or included, and the impact level would be **less than significant with mitigation**.

Threshold c. Would the proposed project disturb any human remains, including those interred outside of dedicated cemeteries?

Buried human remains that were not identified during field surveys could be inadvertently unearthed during excavation activities, which could result in damage to these human remains.. Therefore, this impact is considered potentially significant, and a mitigation measure was developed that contains procedures for recording and treating any human remains that are discovered during implementation of the proposed project. **Mitigation Measure CUL-6** requires that these items be protected, preserved and treated in accordance with applicable laws, regulations and guidelines.

MITIGATION MEASURES

Mitigation Measure CUL-6: If human remains are encountered during project activities, the California Health and Safety Code (HSC) requires that excavation be halted in the immediate area and the local county coroner is to be notified to determine the nature of the remains. It is very important that the suspected remains, and the area around them, are undisturbed and the proper authorities called to the scene as soon as possible, as it could be a crime scene. The Coroner will determine if the remains are archaeological/historic or of modern origin and if there are any criminal or jurisdictional questions. The coroner is required to examine all discoveries of human remains within 24 hours of receiving notice of a discovery (HSC 7050.5[b]). If the coroner determines that the remains are Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (HSC 7050.5[c]).

The responsibilities of the NAHC for acting upon notification of a discovery of Native American human remains are identified within the California Public Resources Code (PRC 5097.9). The NAHC is responsible for immediately notifying the person it believes is the Most Likely Descendant (MLD) of the Native American remains. With permission of the legal landowner(s), the MLD may visit the site and make recommendations regarding the treatment and disposition of the human remains and any associated grave goods. This is to

be conducted within 24 hours of their notification by the NAHC (PRC 5097.98[a]). If an agreement for treatment of the remains cannot be resolved satisfactorily, any of the parties may request mediation by the NAHC (PRC 5097.94[k]). Should mediation fail, the landowner or the landowner's representative must reinter the remains and associated items with appropriate dignity on the property in a location not subject to further subsurface disturbance (PRC 5097.98[b]).

Timing/Implementation: *During project construction*

Monitoring/Enforcement: *City of Placerville Engineering Department*

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding the proposed project causing a substantial adverse change in the significance of an archaeological resource were determined to be **potentially significant** without mitigation. Therefore, mitigation measures were required or included, and the impact level would be **less than significant with mitigation**.

4.4.8 Cumulative Impacts

Cumulative impacts on cultural resources could occur if the projects identified in **Section 3.6, Cumulative Projects, Table 3.6-1** in combination with the proposed project, have or will propose changes to character-defining features that convey the significance of the historic districts or other historic properties, or require excavation activities that encounter archaeological resources or human remains.

The projects listed in **Section 3.6, Cumulative Projects, Table 3.6-1** generally involve new construction and modifications of existing buildings, both within and outside of known historic districts, as well as improvements to transportation and streetscape systems and features. These projects would be located within boundaries of the City and have the potential to cumulatively affect the urban character, community cohesion, access patterns, and economic characteristic of the project vicinity.

When viewed in the overall context of the assumed-eligible Placerville Main Street District, the removal, modification or movement contributing elements that are part of the proposed project are not substantial nor predominant. Although individual historical resources would be impacted by the proposed project, the overall character-defining elements of the assumed-eligible Placerville Main Street District that contribute to the themes of transportation, settlement, architecture, commerce, government, and monuments would continue be evident when the proposed project is completed. The proposed project's impact on the assumed-eligible Placerville Main Street District is considered less than significant.

Additionally, the City General Plan contains policies that require each new project within historic neighborhoods is designed and constructed in a manner that is compatible with existing historic development. There are also policies to avoid impacts to significant cultural resources to the extent feasible. This regulatory structure would reduce the incremental contribution of the proposed project to any potential cumulative impact.

Some of the cumulative projects may occur in the vicinity of known archaeological resources. Projects may also occur in locations with higher sensitivity with respect to yielding currently unknown archaeological resources, including both human remains and tribal cultural resources. However, archaeological discovery and treatment measures are anticipated to be conditions of approval for the projects listed in **Section 3.6, Cumulative Projects, Table 3.6-1**, which would avoid or minimize impacts to these resources on a project-by-project basis and therefore avoid a cumulative impact.

For the reasons, on a cumulative basis that considers potential impacts on cultural and tribal cultural resources in combination with other approved and planned projects that may occur, the proposed project's contribution to potential impacts on cultural resources would be less than cumulatively considerable.

4.5 Greenhouse Gases

4.5.1 Introduction

This section evaluates the greenhouse gas (GHG) emissions impacts of the Clay Street Bridge Replacement Project (proposed project) and the consistency of the project with relevant plans and programs that are applicable to the proposed project area. The impact assessment is based upon a review of relevant literature and technical reports that include, but are not limited to, information and guidelines by the California Air Resources Board (CARB), the U.S. Environmental Protection Agency (USEPA), and the applicable provisions of the California Environmental Quality Act (CEQA).

4.5.2 Environmental Setting

GHGs and climate change are a cumulative global issue. The CARB and the USEPA regulate GHG emissions within the State of California and the United States, respectively. While the CARB has the primary regulatory responsibility within California for GHG emissions, local agencies can also adopt policies for GHG emission reduction.

4.5.2.1 Climate Change

Climate change refers to long-term changes in temperature, precipitation, wind patterns, and other elements of the Earth's climate system. The Intergovernmental Panel on Climate Change, established by the United Nations and World Meteorological Organization in 1988, is devoted to greenhouse gas (GHG) emissions reduction and climate change research and policy. Climate change in the past has generally occurred gradually over millennia, or more suddenly in response to cataclysmic natural disruptions. The research of the Intergovernmental Panel on Climate Change and other scientists over recent decades, however, has unequivocally attributed an accelerated rate of climatological changes over the past 150 years to GHG emissions generated from the production and use of fossil fuels.

Human activities generate GHGs consisting primarily of carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), tetrafluoromethane, hexafluoroethane, sulfur hexafluoride (SF6), and various hydrofluorocarbons (HFCs). CO2 is the most abundant GHG; while it is a naturally occurring and necessary component of Earth’s atmosphere, fossil-fuel combustion is the main source of additional, human-generated CO2 that is the main driver of climate change. In the U.S. and in California, transportation is the largest source of GHG emissions, mostly CO2.

The impacts of climate change are already being observed in the form of sea level rise, drought, more intense heat, extended and severe fire seasons, and historic flooding from changing storm patterns.

4.5.2.2 Greenhouse Gases

Many chemical compounds found in the Earth's atmosphere act as GHGs, which allow sunlight to enter the atmosphere freely. When sunlight strikes the Earth's surface, some of it is reflected back towards space as infrared radiation (heat). GHGs absorb this infrared radiation and trap the heat in the atmosphere. Over time, the amount of energy sent from the sun to the Earth's surface should be about the same as the amount of energy radiated back into space, leaving the temperature of the Earth's surface roughly constant. Many gases exhibit these "greenhouse" properties. Some of them occur in nature (water vapor, carbon dioxide, methane, and nitrous oxide), while others are exclusively human-made (like gases used for aerosols). The most relevant GHGs are water vapor (H2O), CO2, CH4, N2O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulfur hexafluoride (SF6). These gases prevent heat from escaping to space.

The principal GHGs resulting from human activity that enter and accumulate in the atmosphere are listed below:

- **Carbon Dioxide (CO2):** CO2 is the most abundant GHG in the Earth's atmosphere after water vapor. CO2 enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and chemical reactions (e.g., the manufacture of cement). CO2 is removed from the atmosphere (or "sequestered") when it is absorbed by plants as part of the biological carbon cycle. CO2 absorbs terrestrial infrared radiation that would otherwise escape to space and has an atmospheric lifetime of up to 200 years; therefore, it is a more important GHG than water vapor, which has an atmospheric residence time of only a few days. Global warming potential (GWP) is a concept developed to allow the comparison of the ability of each GHG to trap heat in the atmosphere relative to CO2 or a specific time horizon. CO2 provides the reference point for the GWP of other gases, with the GWP of CO2 being equal to 1.
- **Methane (CH4):** CH4 is emitted during the production and transport of coal, natural gas, and oil. CH4 emissions also result from livestock and agricultural practices and the decay of organic waste in municipal solid waste landfills. The chemical lifetime of CH4 in the atmosphere is 12 years. CH4 is about 21 times more powerful at warming the atmosphere than CO2 (a GWP of 21).
- **Nitrous Oxide (N2O):** N2O is emitted during agricultural and industrial activities as well as during combustion of fossil fuels and solid waste. N2O has a long atmospheric lifetime (120 years) and heat-trapping effects about 310 times more powerful than CO2 on a per/molecule basis (a GWP of 310).

Global warming potential is a relative measure, compared to CO2, of a compound's residence time in the atmosphere and ability to warm the planet. Mass emissions of GHGs are converted into CO2 equivalent (CO2e) emissions for ease of comparison.

4.5.3 Regulatory Setting

This section outlines federal and state efforts to comprehensively reduce GHG emissions from transportation sources.

4.5.3.1 Federal

To date, no national standards have been established for nationwide mobile-source GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level.

The National Environmental Policy Act (NEPA) (42 United States Code [USC] Part 4332) requires federal agencies to assess the environmental effects of their proposed actions prior to making a decision on the action or project.

The Federal Highway Administration (FHWA) recognizes the threats that extreme weather, sea level change, and other changes in environmental conditions pose to valuable transportation infrastructure and those who depend on it. FHWA, therefore, supports a sustainability approach that assesses vulnerability to climate risks and incorporates resilience into planning, asset management, project development and design, and operations and maintenance practices (FHWA 2022). This approach encourages planning for sustainable highways by addressing climate risks while balancing environmental, economic, and social values— “the triple bottom line of sustainability” (FHWA n.d.). Program and project elements that foster sustainability and resilience also support economic vitality and global efficiency, increase safety and mobility, enhance the environment, promote energy conservation, and improve the quality of life.

The federal government has taken steps to improve fuel economy and energy efficiency to address climate change and its associated effects. The most important of these was the Energy Policy and Conservation Act of 1975 (42 USC Section 6201) as amended by the Energy Independence and Security Act (EISA) of 2007; and Corporate Average Fuel Economy (CAFE) Standards. This act established fuel economy standards for on-road motor vehicles sold in the United States. The U.S. Department of Transportation’s National Highway Traffic and Safety Administration (NHTSA) sets and enforces the CAFE standards based on each manufacturer’s average fuel economy for the portion of its vehicles produced for sale in the United States. The USEPA calculates average fuel economy levels for manufacturers, and also sets related GHG emissions standards under the Clean Air Act (CAA). Raising CAFE standards leads automakers to create a more fuel-efficient fleet, which improves our nation’s energy security, saves consumers money at the pump, and reduces GHG emissions (U.S. DOT 2014).

USEPA published a final rulemaking on December 30, 2021, that raised federal GHG emissions standards for passenger cars and light trucks for model years 2023 through 2026, increasing in stringency each year. The updated GHG emissions

standards will avoid more than 3 billion tons of GHG emissions through 2050. In April 2022, NHTSA announced corresponding new fuel economy standards for model years 2024 through 2026, which will reduce fuel use by more than 200 billion gallons through 2050 compared to the old standards and reduce fuel costs for drivers (USEPA 2022; NHTSA 2022).

4.5.3.2 State Plans, Policies and Regulations

The CARB, a department of the California Environmental Protection Agency, oversees air quality planning and control throughout California by administering the State implementation Plan (SIP). Its primary responsibility lies in ensuring implementation of the 1989 amendments to the California Clean Air Act (CCAA), responding to the federal CAA requirements and regulating emissions from motor vehicles sold in California. In addition, California has been innovative and proactive in addressing GHG emissions and climate change by passing multiple Senate and Assembly bills and executive orders (EOs) including, but not limited to, the following:

EO S-3-05 (June 1, 2005): The goal of this EO is to reduce California's GHG emissions to: (1) year 2000 levels by 2010, (2) year 1990 levels by 2020, and (3) 80 percent below year 1990 levels by 2050. This goal was further reinforced with the passage of Assembly Bill (AB) 32 in 2006 and Senate Bill (SB) 32 in 2016.

Assembly Bill (AB) 32, Chapter 488, 2006, Núñez and Pavley, The Global Warming Solutions Act of 2006: AB 32 codified the 2020 GHG emissions reduction goals outlined in EO S-3-05, while further mandating that the CARB create a scoping plan and implement rules to achieve "real, quantifiable, cost-effective reductions of greenhouse gases." The Legislature also intended that the statewide GHG emissions limit continue in existence and be used to maintain and continue reductions in emissions of GHGs beyond 2020 (Health and Safety Code [H&SC] Section 38551(b)). The law requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

EO S-01-07 (January 18, 2007): This order sets forth the low carbon fuel standard (LCFS) for California. Under this EO, the carbon intensity of California's transportation fuels is to be reduced by at least 10 percent by the year 2020. ARB re-adopted the LCFS regulation in September 2015, and the changes went into effect on January 1, 2016. The program establishes a strong framework to promote the low-carbon fuel adoption necessary to achieve the governor's 2030 and 2050 GHG reduction goals.

Senate Bill (SB) 375, Chapter 728, 2008, Sustainable Communities and Climate Protection: This bill requires CARB to set regional emissions reduction targets for passenger vehicles. The Metropolitan Planning Organization (MPO) for each region must then develop a "Sustainable Communities Strategy" (SCS) that integrates transportation, land-use, and housing policies to plan how it will achieve the emissions target for its region.

SB 391, Chapter 585, 2009, California Transportation Plan: This bill requires the State's long-range transportation plan to identify strategies to address California's climate change goals under AB 32.

EO B-16-12 (March 2012) orders State entities under the direction of the Governor, including CARB, the California Energy Commission, and the Public Utilities Commission, to support the rapid commercialization of zero-emission vehicles. It directs these entities to achieve various benchmarks related to zero-emission vehicles.

EO B-30-15 (April 2015) establishes an interim statewide GHG emission reduction target of 40 percent below 1990 levels by 2030 to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050. It further orders all state agencies with jurisdiction over sources of GHG emissions to implement measures, pursuant to statutory authority, to achieve reductions of GHG emissions to meet the 2030 and 2050 GHG emissions reductions targets. It also directs ARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent ($MMTCO_2e$). GHGs differ in how much heat each traps in the atmosphere, called global warming potential, or GWP. CO_2 is the most important GHG, so amounts of other gases are expressed relative to CO_2, using a metric called "carbon dioxide equivalent," or CO_2e. The global warming potential of CO_2 is assigned a value of 1, and the GWP of other gases is assessed as multiples of CO_2. Finally, it requires the Natural Resources Agency to update the state's climate adaptation strategy, Safeguarding California, every 3 years, and to ensure that its provisions are fully implemented.

SB 32, Chapter 249, 2016 codifies the GHG reduction targets established in EO B-30-15 to achieve a mid-range goal of 40 percent below 1990 levels by 2030.

SB 1386, Chapter 545, 2016, declared "it to be the policy of the state that the protection and management of natural and working lands … is an important strategy in meeting the state's greenhouse gas reduction goals, and would require all state agencies, departments, boards, and commissions to consider this policy when revising, adopting, or establishing policies, regulations, expenditures, or grant criteria relating to the protection and management of natural and working lands."

SB 743, Chapter 386 (September 2013): This bill changes the metric of consideration for transportation impacts pursuant to CEQA from a focus on automobile delay to alternative methods focused on vehicle miles traveled, to promote the state's goals of reducing greenhouse gas emissions and traffic related air pollution and promoting multimodal transportation while balancing the needs of congestion management and safety.

SB 150, Chapter 150, 2017, Regional Transportation Plans: This bill requires CARB to prepare a report that assesses progress made by each metropolitan planning organization in meeting their established regional GHG emission reduction targets.

EO B-55-18 (September 2018) sets a new statewide goal to achieve and maintain carbon neutrality no later than 2045. This goal is in addition to existing statewide targets of reducing GHG emissions.

AB 1279, Chapter 337, 2022, The California Climate Crisis Act: This bill mandates carbon neutrality by 2045 and establishes an emissions reduction target of 85 percent below 1990 level as part of that goal. This bill solidifies a goal included in EO B-55-18. It requires ARB to work with relevant state agencies to ensure that updates to the scoping plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies in California, as specified.

4.5.3.3 Regional Plans, Policies, and Regulations

METROPOLITAN TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

The Sacramento Area Council of Governments' (SACOG) 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) is the latest update of a long-range policy and planning program that establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035, and thus establishes an overall GHG target for the region beyond 2040. SACOG prepares the MTP/SCS to provide federally mandated long-range transportation planning for the six-county area that includes El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties. SACOG collaborates with the El Dorado County Transportation Commission (EDCTC) to maintain consistency across county plans and the broader regional framework. The proposed project is included in the 2023-26 SACOG Metropolitan Transportation and Improvement Program (MTIP) as a line-item project.

The MTP/SCS for the Sacramento region proactively links land use, air quality, and transportation needs. The MTP/SCS supports the Sacramento Region Blueprint, which implements smart growth principles, including housing choice, compact development, mixed-use development, natural resource conservation, use of existing assets, quality design, and transportation choice. It also provides increased transportation options while reducing congestion, shortening commute times, and improving air quality.

EL DORADO COUNTY AIR QUALITY MANAGEMENT DISTRICT

The proposed project is under the jurisdiction of the El Dorado County Air Quality Management District (EDCAQMD), which regulates air quality according to the standards established in the federal CAA and CCAA and amendments to those acts. The EDCAQMD also regulates GHG emission contributions from land use projects through GHG significance thresholds, which were developed in association with a committee of air districts in the Sacramento region and are intended to establish a uniform scale to measure the significance of land use development projects in its jurisdiction.

4.5.4 Methodology and Thresholds of Significance

The GHG significance criteria were developed considering the CEQA significance criteria developed by the local air quality districts in the project area, approved CEQA air quality checklists, and considering other federal criteria.

4.5.4.1 Methodology

GHG-related impacts were assessed in accordance with methodologies recommended by CARB and the EDCAQMD, based on the proposed project components described in the project description in **Section 3.0**. Construction-generated GHG emissions were modeled using the Road Construction Emissions Model Version 9.0.0. The model was developed by the Sacramento Metropolitan Air Quality Management District (SMAQMD) and can be used to determine the emission impacts of road construction projects. For the purposes of this analysis, it was assumed that construction would last approximately 9-12 months, the total proposed project area would be a total of 1.39 acres, and the maximum area disturbed per day would be 1 acre per day. It was also assumed that all on-road equipment would meet CARB Tier 4 requirements for all off-road equipment (**Appendix D**).

The impacts of the proposed project from mobile-source GHG emissions during the post-construction operations was evaluated based on AM and PM peak-hour vehicle traffic numbers coupled with their estimated average vehicle delay at the project-affected intersections as identified in the transportation analysis report prepared for the proposed project (Fehr & Peers 2018). Emissions were calculated by multiplying automobile-idling vehicle emissions factors generated by CARB's EMFAC2021 emission program by the number of peak-hour vehicles and by the seconds of delay experienced per vehicle, both identified in the transportation analysis report (Fehr & Peers 2018). The average daily volume of traffic through each intersection and average daily delay times are not known; however, a conservative estimate was made of the daily traffic (and the resulting GHG emissions) by multiplying the peak hour data by 10, and then by 365 days per year (**Appendix D**).

4.5.4.2 Thresholds

Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects associated with Greenhouse Gases. The following threshold questions are used to evaluate the impacts on GHG:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

4.5.5 Project Impacts

Threshold a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

CONSTRUCTION

Construction activities, such as site preparation, site grading, on-site heavy-duty construction vehicles, equipment hauling materials to and from the site, and motor vehicles transporting the construction crew would produce combustion emissions from various sources. During proposed project construction, GHGs would be emitted through the operation of construction equipment, worker vehicles, and from supply vendor vehicles, each of which typically uses fossil-based fuels to operate. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change. Construction-generated GHG emissions were modeled using the Road Construction Emissions Model Version 9.0.0 and represented in **Table 4.5.1**.

TABLE 4.5.1 CONSTRUCTION-RELATED GREENHOUSE GAS EMISSIONS (METRIC TONS PER YEAR)

CONSTRUCTION ACTIVITIES	METRIC TONS OF CO2E
Year 2025	889.28
EDCAQMD Threshold	1,100
Exceeds Threshold?	**NO**

Source: Sacramento Metropolitan AQMD Road Construction Emissions Model, Version 9.0.0 2018

The estimated GHG emissions resulting from the proposed project's construction would be a maximum of approximately 9,677 pounds of CO2e per day, which is equivalent to a total of approximately 889.28 $MTCO_2e$, over a 12-month construction period. Roadway Construction Emissions Model results for the proposed project are available in **Appendix D**. Additionally, the proposed project would not exceed the EDCAQMD significance thresholds for construction-generated GHG emissions.

OPERATION

The proposed project would accommodate a two-lane road with sidewalks on both sides allowing for pedestrian and bicycle connections to the El Dorado Trail. The proposed project would not increase capacity of Clay Street, Main Street, or Cedar Ravine Road for vehicles in the proposed project area; therefore, long-term GHG concerns are not anticipated. The only potential source of GHG emissions would be attributable to vehicle idling times under the new intersection configuration; however, there would not be an increase in the number of vehicles as a result of the proposed project.

The proposed project's operational GHG emissions for the four-way intersection configuration are summarized and compared to existing conditions in **Table 4.5.2.**

TABLE 4.5.2 OPERATIONAL (IDLING) GREENHOUSE GAS EMISSIONS (METRIC TONS PER YEAR)						
CONDITIONS	INTERSECTIONS					TOTAL
	US 50/ BEDFORD AVE.	MAIN ST./ BEDFORD AVE.	MAIN ST./ CLAY ST.	MAIN ST./ CEDAR RAVINE RD.	PACIFIC ST./ CEDAR RAVINE RD.	
Metric Tons CO2e per Year						
Existing	686.92	215.81	159.08	102.53	242.26	1406.60
Proposed Project	713.34	196.19	0	162.88	161.50	1233.91
					Net Change	**-172.69**
					EDCAQMD Significant Impact Threshold	1,100
					Exceed EDCAQMD Threshold?	**NO**

Source: EMFAC 2021

As shown in **Table 4.5.2**, operation of the proposed project would reduce emissions by approximately 172 MTCO2e annually as a result of the proposed intersection improvements that reduce vehicle idling. Additionally, emissions would not exceed EDCAQMD significance thresholds for operational GHG emissions, and the impact level is less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE

Impacts regarding generating greenhouse gas emissions, either directly or indirectly were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold b. Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As discussed in **Section 4.3, Air Quality**, SACOG prepares the MTP/SCS to provide federally mandated long-range transportation planning for the six-county area that includes El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties. SACOG collaborates with the El Dorado County Transportation Commission (EDCTC) to maintain consistency across county plans and the broader regional framework. The

currently approved regional plans and programs are the SACOG and the 2023-2026 SACOG Metropolitan Transportation Improvement Program (MTIP). On December 16, 2022, the SACOG 2023-26 Metropolitan Transportation and Improvement Program (MTIP), Amendment #2 to the Metropolitan Transportation Plan – Sustainable Communities Strategy (MTP), and accompanying Air Quality Conformity Analysis received federal approval. The proposed project is a "line item project" in the MTP/SCS. Because the proposed project itself is included in the MTP/SCS as a line-item project, it is consistent with the MTP/SCS. Therefore, it can be assumed that regional mobile emissions would decrease in line with the goals of the MTP/SCS.

The proposed project would not increase vehicle capacity or create other permanent new sources of GHG emissions. As discussed in **Section 4.5.5.1**, operation of the proposed project would result in a decrease of GHG emissions; and the impact level is less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE

Impacts regarding conflicting with any applicable plan, policy or regulation adopted for the purposes of reducing greenhouse gases were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

4.5.6 Cumulative Impacts

The proposed project's cumulative (2035) operational GHG emissions are summarized and compared to the cumulative no project conditions in **Table 4.5.3**. The cumulative plus project and cumulative no project GHG emissions are compared to the EDCAQMD the GHG significance threshold, and to each other.

TABLE 4.5.3 CUMULATIVE OPERATIONAL (IDLING) GREENHOUSE GAS EMISSIONS (METRIC TONS PER YEAR)

CONDITIONS	INTERSECTIONS					TOTAL
	US 50/ BEDFORD AVE.	MAIN ST./ BEDFORD AVE.	MAIN ST./ CLAY ST.	MAIN ST./ CEDAR RAVINE RD.	PACIFIC ST./ CEDAR RAVINE RD.	
Metric Tons CO_2e per Year						
No Project	674.91	212.04	156.30	100.74	238.02	1382.03
Proposed Project	700.87	192.76	0	160.03	158.68	1212.35
					Net Change	**-169.68**

TABLE 4.5.3 CUMULATIVE OPERATIONAL (IDLING) GREENHOUSE GAS EMISSIONS (METRIC TONS PER YEAR)						
CONDITIONS	INTERSECTIONS					TOTAL
	US 50/ BEDFORD AVE.	MAIN ST./ BEDFORD AVE.	MAIN ST./ CLAY ST.	MAIN ST./ CEDAR RAVINE RD.	PACIFIC ST./ CEDAR RAVINE RD.	
EDCAQMD Significant Impact Threshold						1,100
Exceed EDCAQMD Threshold?						**NO**

Source: EMFAC2021

As shown in **Table 4.5.2**, operation of the proposed project under cumulative conditions, which include the projects listed in **Section 3.6, Cumulative Projects, Table 3.6-1**, as well as those identified in the MTP/SCS for traffic purposes, would reduce emissions by approximately 169 $MTCO_2e$ annually compared with the cumulative no project. This is a result of improved intersection functions resulting from the proposed project, that help to reduce vehicle idling. Therefore, the proposed project would not combine with past, present, and reasonably foreseeable future project and would not be cumulatively considerable.

4.6 Hazards and Hazardous Materials

4.6.1 Introduction

This section of the Recirculated Environmental Impact Report (REIR) addresses potential impacts of the Clay Street Bridge Replacement Project (proposed project) on hazards and hazardous materials. This section includes a summary of applicable regulations, a description of existing hazards and hazardous materials conditions, and an analysis of potential impacts associated with the proposed project. This section is based on the Initial Site Assessment (ISA) (Drake Haglan 2016) that was prepared for the proposed project, and the updated database report obtained from Environmental Database Resources, Inc. (EDR) in May 2021. Potential impacts during construction and operation of the project are discussed using applicable thresholds where indicated. Mitigation measures that would reduce impacts, where applicable, are also discussed in this section.

4.6.2 Environmental Setting

4.6.2.1 Hazardous Materials Defined

A hazardous material is any substance that, because of its quantity, concentration, or physical or chemical properties, may pose a hazard to human health and the environment. Under Title 22 of the California Code of Regulations (CCR), the term “hazardous substance” refers to both hazardous materials and hazardous wastes. Both of these are classified according to four properties: (1) toxicity; (2) ignitability; (3) corrosiveness; and, (4) reactivity (CCR Title 22, Chapter 11, and Article 3). A hazardous material is defined in CCR, Title 22 as:

> A substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed (CCR, Title 22, Section 66260.10).

Hazardous materials in various forms can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Hazards to human health and the environment can occur during production, storage, transportation, use, or disposal of hazardous materials.

4.6.2.2 Initial Site Assessment (ISA)

An ISA for hazardous materials was completed in April 2016 in general conformance with the scope and limitations of ASTM Practice E 1527-05 for the proposed project (Drake Haglan 2016). The purpose of this assessment was to identify whether there

are any Recognized Environmental Conditions (REC) or potential RECs within and adjacent to the proposed project site which can affect the design, constructability, feasibility, and/or the cost of the proposed project. RECs are defined by the American Society for Testing and Materials (ASTM) as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment."

The ISA identified the following potential hazards in the proposed project area and vicinity: lead-based paint (LBP); asbestos-containing materials (ACM); naturally occurring asbestos (NOA); petroleum hydrocarbons from former and current business operations, including gasoline underground storage tanks at former gasoline service stations; and abandoned underground storage tanks. As defined by the ASTM, LBP and ACM are not RECs because these are typical construction waste management issues. Further, the proposed project is receiving federal funding, thus also subject to environmental review and approval by the California Department of Transportation (Caltrans); Caltrans has a process for evaluating asbestos and lead on the proposed project site, with guidance documents establishing the methodology and technologies for site-specific investigations.

LEAD-BASED PAINT (LBP)

Lead has been used in commercial, residential, roadway, and ceramic paint; in electric batteries and other devices; as a gasoline additive; for weighting; in gunshot; and other purposes. It is recognized as toxic to human health and the environment and is widely regulated in the United States. Structures constructed prior to 1978 are presumed to contain LBP unless proven otherwise, although buildings constructed after 1978 may also contain lead-based paints. Due to the construction age of the existing Clay Street Bridge, painted areas on the existing Clay Street Bridge have the potential to contain LBP. Additionally, pavement striping and thermoplastic paint used on roadways often contain lead. The potential exists for the Clay Street Bridge, Main Street, Clay Street, and Cedar Ravine Road to contain LBP.

AERIALLY DEPOSITED LEAD (ADL)

Highway US 50 runs adjacent to the proposed project site and is seen in the EDR report aerial photos since 1957. Areas adjacent to roadways heavily used prior to 1978 could potentially contain lead due to the use of lead as a gasoline additive during this time.

ASBESTOS-CONTAINING MATERIALS (ACM)

Use of ACM were banned by the U.S. Environmental Protection Agency (USEPA) in 1989. Revisions to regulations issued by the Occupational Safety & Health Administration (OSHA) on June 30, 1995, require that all thermal systems insulation, surfacing materials, and resilient flooring materials installed prior to 1981 be considered Presumed Asbestos Containing Materials (PAC) and treated accordingly. In order to rebut the designation as PAC, OSHA requires that these materials be

surveyed, sampled, and assessed in accordance with 40 CFR 763 (Asbestos Hazard Emergency Response Act [AHERA]). ACM have also been documented in the rail shim sheet packing, bearing pads, support piers, and expansion joint material of bridges. The Caltrans Historic Bridge Inventory indicates that the Clay Street Bridge over Hangtown Creek was built in 1940; however, as discussed in **Section 4.4, Cultural Resources**, the Clay Street Bridge was likely built circa 1920, estimated 1926. Thus, due to the age and structure type of the Clay Street Bridge, there is the potential to encounter ACMs during demolition.

NATURALLY OCCURING ASBESTOS (NOA)

As reported in the map of Asbestos Review Areas, Western Slope, County of El Dorado, State of California, there is no significant occurrence of ultramafic rock where NOA is likely to occur in the proposed project area. However, the entire proposed project area is located in a buffer zone identifying the potential for NOA resulting from a north-south-trending fault that crosses Bedford Avenue and Main Street in the western portion of the proposed project area, indicating that NOA could potentially occur in the area (El Dorado County 2018).

PETROLEUM HYDROCARBONS

Federal, State, and local (El Dorado County [County] and City of Placerville [City]) listings were obtained through EDR in October 2009 for the 2016 ISA and again in May 2021 to determine if additional RECs have been identified within the proposed project vicinity. The EDR Report consists of information compiled from various government records, such as Geotracker, National Priorities List and Solid Waste System.

A database report was obtained from EDR in 2016 and 2021 to determine if RECs have been identified within the proposed project vicinity. According the EDR Report, there are twenty-five (25) Leaking Underground Storage Tank (LUST) sites, which are included on the Cortese List of hazardous materials sites compiled pursuant to Government Code Section 65962.5, within ½ mile of the proposed project site. All 25 LUST sites have the regulatory status of “Case Closed” and are not considered a threat to the site.

IVY HOUSE PARKING LOT – 595 MAIN STREET

The Ivy Houe parking lot is a City lot; however, as identified on the Sanborn Map, this property was a former Union service station. The disposition of the gasoline Underground Storage Tanks (USTs) is unknown. However, during March 11, 2009 trenching activities, hydrocarbon odors were detected in a six-foot-deep trench excavated in the south-central portion of the parking lot near where the former Union gas station was located. The City Building Department and the El Dorado County Environmental Health Department report that no records exist for the address. Based on the location within the proposed project area, the up-gradient location, and the

shallow depth to groundwater, the former gasoline service station is considered a REC and anticipated to be a source of contamination.

4.6.2.3 Sensitive Receptors

Preschools, schools, daycare centers, nursing homes, and hospitals are considered sensitive receptors for hazardous material issues because children and the elderly are more susceptible than adults to the effects of many hazardous materials. California Environmental Quality Act (CEQA) Guidelines Section 15186 requires consideration of projects within one-quarter mile of a school to ensure that potential health impacts resulting from exposure to hazardous materials, wastes, and substances are evaluated. There is one public school within one-quarter mile of the project site—Sierra Elementary School at 1100 Thompson Way.

4.6.3 Regulatory Setting

Hazardous materials, including hazardous substances and wastes, are regulated by many federal laws. Statutes govern the generation, treatment, storage, and disposal of hazardous materials, substances, and waste, and also the investigation and mitigation of waste releases, air and water quality, human health, and land use.

4.6.3.1 Federal

U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)

The USEPA was established in 1970 to consolidate in one agency a variety of Federal research, monitoring, standard-setting, and enforcement activities to ensure environmental protection. The USEPA's mission is to protect human health and to safeguard the natural environment - air, water, and land - upon which life depends. The USEPA works to develop and enforce regulations that implement environmental laws enacted by Congress, is responsible for researching and setting national standards for a variety of environmental programs, and delegates to states and tribes the responsibility for issuing permits and for monitoring and enforcing compliance. Where national standards are not met, the USEPA can issue sanctions and take other steps to assist the states and tribes in reaching the desired levels of environmental quality.

FEDERAL TOXIC SUBSTANCES CONTROL ACT/RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)/HAZARDOUS AND SOLID WASTE ACT (HSWA)

The federal Toxic Substances Control Act (1976) and the Resource Conservation Recovery Act (RCRA) of 1976 established a program administered by the USEPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the “cradle to grave” system of regulating hazardous wastes.

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT/SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT (CERCLA)

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law (U.S. Code Title 42, Chapter 103) provides broad Federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites; provides for liability of persons responsible for releases of hazardous waste at these sites; and, establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enables the revision of the National Contingency Plan (NCP). The NCP (Title 40, Code of Federal Regulation [CFR], Part 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List (NPL). CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

CLEAN WATER ACT (CWA)/SPILL, PREVENTION, CONTROL, AND COUNTERMEASURE (SPCC) RULE

The federal Clean Water Act (CWA) (33 U.S. Code Section 1251 et seq., formally the Federal Water Pollution Control Act of 1972), was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. As part of the CWA, the USEPA oversees and enforces the Oil Pollution Prevention regulation contained in Title 40 of the CFR, Part 112 (Title 40 CFR, Part 112), which is often referred to as the “Spill, Prevention, Control, and Countermeasure (SPCC) rule” because the regulations describe the requirements for facilities to prepare, amend, and implement SPCC plans. A facility is subject to SPCC regulations if a single oil storage tank has a capacity greater than 660 gallons, or the total above ground oil storage capacity exceeds 1,320 gallons, or the underground oil storage capacity exceeds 42,000 gallons, and if, due to its location, the facility could reasonably be expected to discharge oil into or upon the “navigable waters” of the U.S.

Other Federal regulations overseen by the USEPA relevant to hazardous materials and environmental contamination include Title 40 CFR Chapter 1, Subchapter D – Water Programs and Subchapter I – Solid Wastes. Title 40 CFR Chapter 1, Subchapter D, Parts 116 and 117 designate hazardous substances under the CWA. Title 40 CFR Part 116 sets forth a determination of the reportable quantity for each substance that is designated as hazardous. Title 40 CFR Part 117 applies to quantities of designated substances equal to or greater than the reportable quantities that may be discharged into waters of the U.S.

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA)

OSHA's mission is to ensure the safety and health of America's workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. OSHA staff establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation programs. OSHA standards are listed in Title 29 CFR Part 1910.

4.6.3.2 State Plans, Policies and Regulations

HAZARDOUS MATERIALS MANAGEMENT

The primary state laws pertaining to hazardous materials and wastes that may be applicable to the proposed project, depending on the activity, include the Hazardous Waste Control Law, Hazardous Substances Information and Training Act, the Air Toxics Hot Spots and Emissions Inventory Law, the Underground Storage of Hazardous Substances Act, and Porter-Cologne Water Quality Control Act.

At the state level, the California Environmental Protection Agency (CalEPA) is the "umbrella" agency under which a number of the state's environmental agencies operate. These subordinate agencies include the California Air Resources Board (CARB), the Department of Pesticide Regulation, the Department of Toxic Substances Control (DTSC), the California Department of Resources Recycling and Recovery (CalRecycle), the Office of Environmental Health Hazard Assessment, and the State Water Resources Control Board.

Within the CalEPA, the DTSC has primary regulatory responsibility for hazardous waste management. The CalEPA has adopted regulations implementing a Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The program is implemented at the local level by a local agency—the Certified Unified Program Agency (CUPA). The El Dorado County Environmental Management Department is the CUPA for the County.

The California Highway Patrol, Caltrans, and the DTSC implement and enforce state and federal laws regarding hazardous materials transportation.

GENERAL CONSTRUCTION PERMIT STORMWATER POLLUTION AND PREVENTION PLAN

Certain projects are required to comply with the National Pollutant Discharge Elimination System (NPDES) general construction permit to manage stormwater runoff (see **Section 4.7, Hydrology and Water Quality**). This permit requires a stormwater pollution prevention plan (SWPPP) that identifies best management practices (BMPs) for the handling of fuels and oils, including measures to minimize the potential for spills and procedures for spill cleanup if it were to occur. Implementation of these BMPs is intended to minimize the potential for accidental spills on construction sites by requiring the designation of safe, covered storage areas for such materials as well as safe handling practices.

CONTAMINATED SITE INVESTIGATION AND REMEDIATION

The DTSC and the Regional Water Quality Control Board (RWQCB) are the two primary agencies for issues pertaining to sites where hazardous materials have resulted in environmental contamination (e.g., soil and groundwater). The Central Valley RWQCB is the regional authority for water quality. Local jurisdictions, such as El Dorado County, may also be involved in site remediation projects, such as leaking underground storage tanks. These agencies implement a regulatory process to address the release of hazardous materials that could be harmful to public health and the environment.

ASBESTOS-CONTAINING MATERIALS AND LEAD-BASED PAINT

Federal and State asbestos regulations prohibit emissions of asbestos from demolition or construction activities, among others; specify precautions and safe work practices that must be followed to minimize the potential for release of asbestos fibers; and require notice to federal and local government agencies prior to beginning renovation or demolition that could disturb asbestos-containing building materials. The EDCAQMD and California OSHA (Cal/OSHA) are the agencies with primary responsibility for enforcement of asbestos regulations.

Cal/OSHA standards establish a maximum safe exposure level for types of construction work where lead exposure may occur, including demolition of structures where LBP and ACMs is present; removal or encapsulation of materials containing lead; and new construction, alteration, repair, or renovation of structures with materials containing lead. Inspection, testing, and removing lead-containing building materials must be performed by State-certified contractors who are required to comply with applicable health and safety and hazardous waste regulations.

4.6.3.3 Regional Plans, Policies, and Regulations

CITY OF PLACERVILLE GENERAL PLAN

The City's General Plan Section VI (Health and Safety Element) includes health and safety policies, the goal of which is to minimize public health and safety threats and nuisances to residents and to minimize the potential for property damage and loss. Policies that are applicable to the proposed project's environmental effects related to hazardous materials are listed:

Section V. Policy B.7: The City shall, to the maximum extent possible prevent the dumping of wastes and other substances, such as pesticides, soil sterilants and toxic wastes harmful to soil structures, soil organisms, or fertility.

Section VI. Policy F.1: City approvals of all new development shall consider the potential for the production, use, storage, and transport of hazardous materials and provide for reasonable controls on such hazardous materials.

Section VI. Policy F.2: Within its authority, the City shall regulate the production, use, storage, and transport of hazardous materials to protect the health of Placerville residents.

4.6.4 Methodology and Thresholds of Significance

4.6.4.1 Methodology

The analysis of the proposed project's potential to create hazards to the public health or the environment associated with hazardous materials is based on information in the ISA (Drake Haglan 2016) and a review of project plans.

A site reconnaissance was conducted on December 3, 2015, a review of environmental databases, and a review of historical data sources such as aerial photographs and topographic maps. A database report was obtained from Environmental Database Resources, Inc. (EDR), consisting of information compiled from various government records, such as GeoTracker (State Water Resources Control Board), EnviroStor (California Department of Toxic Substances Control), and numerous other databases containing information about known and potential contaminated sites.

4.6.4.2 Thresholds

Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects associated with hazards and hazardous materials. The following threshold questions are used to evaluate the impacts on hazards and hazardous waste as established in the Initial Study/Notice of Preparation (IS/NOP) for the proposed project (2014):

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

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?

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

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?

e) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

However, the IS/NOP prepared for the proposed project (**Appendix A**) determined that the proposed project would not expose people to aircraft hazards from public or

private airports, and there would be no impact. Additionally, the proposed project site is an urbanized area. It is not within or adjacent to a high fire or extreme high fire hazard area as shown on Figure VIII-2 in the City's (1989) General Plan Background Report. No development is proposed that would involve occupied structures, or areas for the public to gather, which could be exposed to fire hazards beyond current conditions. Therefore, there would be no impact, and the following thresholds of significance are not discussed further:

f) 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?

g) 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?

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?

4.6.5 Project Impacts

Threshold a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

CONSTRUCTION

Hazardous and non-hazardous wastes would be used and transported to and from the proposed project site during the construction phase of the proposed project. Heavy machinery used during site preparation would contain fuel, oil, and lubricants. Various materials such as adhesives, solvents, and paints, would also be used. The amount and types of hazardous materials would be limited and would be on-site only for the duration of construction activities (approximately 9-12 months). The types of hazardous waste that would be used are not acutely hazardous substances as defined in the California Health and Safety Code (which references federal regulations). The use, storage, transportation, and disposal of hazardous materials is highly regulated, as described in the Section 4.6.3, **Regulatory Setting**, above, and the City requires its contractors to comply with all applicable laws and regulations, including Caltrans' construction standard specifications. When used properly, the types and amounts of hazardous materials that would be used during construction would not pose a substantial health risk to construction workers, residents, employees, visitors, and school-age children on or within the vicinity of the proposed project area.

The implementation of a stormwater pollution prevention plan (SWPPP) and BMPs would minimize the potential for hazardous materials used during construction to be discharged to Hangtown Creek or Cedar Ravine and impacts would be less than

significant. SWPPPs are required by the State as part of the Construction General Permit and compliance monitored by the City. BMPs that would be implemented by the construction contractor would include a hazardous materials control and spill response plan, to regulate the use of hazardous materials, as well as the use of straw waffles, berms, or similar barriers to reduce the potential for contaminated runoff. Further BMP discussion related to SWPPP and General Construction Permits can be found in **Section 4.7, Hydrology and Water Quality**.

OPERATION

Operation of the proposed project would involve use of hazardous materials similar to the existing conditions. This is because the proposed project would not change the use of the Clay Street, Main Street, Cedar Ravine Road, or the Ivy House parking lot. Maintenance activities and products for landscaping, roadway maintenance, and bridge maintenance would remain similar to existing conditions; therefore, the impact is less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold 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?

The operation and storage of construction equipment within the proposed project area has the potential to affect water quality through the accidental or inadvertent release of oil, grease, or fuel into adjacent waterways. However, as noted above, and in **Section 4.7, Hydrology and Water Quality**, the proposed project would include BMPs, including spill prevention measures, to address the accidental or inadvertent release of oil, grease, or fuel into adjacent waterways. Such measures would include requiring the storage of reserve fuel and the refueling of construction equipment within designated construction areas and the staging area, and inspection of vehicles for oil and fuel leaks. Further, the City would adhere to all applicable laws and regulations related to construction, environmental protection, and health and safety during construction and operation of the proposed project.

There is one hazardous site in the proposed project area that has the potential to pose a significant hazard. On the 1940 Sanborn Map, a Union service station (with an

associated USTs for gasoline) was identified just east of the Ivy House (601 Main Street, Placerville, CA). The deposition of the tank is unknown. During trenching activities performed for the proposed project in 2009 to investigate the proposed project area for subsurface cultural resources, hydrocarbon odors were detected in a six-foot-deep trench in the south-central portion of the existing Ivy House parking lot, near the site of the former gas station (Drake Haglan 2016). This is identified as a REC because of its location and shallow depth to groundwater, and the REC is anticipated to be a source of contamination likely to be disturbed by the proposed project construction activities (i.e., ground disturbing activities) related to the realignment of Clay Street and reconfiguration of the Ivy House parking lot.

Painted areas on the existing bridge structure may be of concern due to the possible use of LBP. Additionally, pavement striping and thermoplastic paint present within the proposed project area are known to often contain lead. Testing of painted surfaces has not been performed in the proposed project area to determine if lead is present, to date. Therefore, there is a potential for the bridge and associated painted features to contain LBP.

Due to the close proximity of historic highway US 50 to the proposed project site, the potential exists for elevated levels of ADL within the proposed project site.

ACMs have been documented in the rail shim sheet packing, bearing pads, support piers, and expansion joint material of bridges. Testing for ACM has not been performed to date; however, due to the age and structure type of the Clay Street Bridge, ACMs have the potential to be present.

According to the El Dorado County Asbestos Review Areas – Western Slope – County of El Dorado map (El Dorado County 2018), the proposed project is located in an area that has the potential to contain NOA. NOA is discussed in detail in the **Section 4.2, Air Quality** of this document. With adherence to federal, State, and local air quality rules and regulation and the implementation of BMPs, construction-related activities for the proposed project would not be anticipated to result in increased exposure of NOA.

The Ivy House parking lot contains evidence of soil contamination, and ACMs and LBP have the potential to be present on the roadways and bridge components of the proposed project (Drake Haglan 2016). This could pose a hazard to workers and the public during construction activities and would be a potentially significant impact. Hazardous waste from the existing proposed project area would be removed and disposed of in accordance with federal, State, City, and County regulations.

MITIGATION MEASURES

Mitigation Measure HAZ-1: Prior to any ground disturbance, the City of Placerville shall investigate and test soil and groundwater under the Ivy House parking lot, Main Street fronting the parking lot, and the Clay Street alignment extending north to the bridge for the presence of soil and groundwater

contamination. Surface water and sediment sampling in Hangtown Creek shall also be performed to determine whether contaminants have migrated to locations that would be affected by bridge construction. A work plan describing the investigation shall be prepared by a qualified professional and submitted to Caltrans and the El Dorado County Environmental Management Division for review and approval.

The work plan shall be implemented prior to any construction activity in the potentially affected area. If the results of the investigation indicate contamination, the level of contamination shall be evaluated by a qualified professional to determine whether the levels would pose an unacceptable health risk to construction workers, who would be the most susceptible to inhalation and soil/groundwater contact hazards, or if activities involving sediment that would be disturbed by the bridge replacement could be mobilized and pose a risk to surface water in Hangtown Creek. The City shall provide the study report to Caltrans and the El Dorado County Environmental Management Division and shall notify the Central Valley RWQCB and/or DTSC, if reporting is required.

No work shall be allowed to proceed at any location in the investigation study area until hazardous materials contamination has been remediated to levels that are protective of human health and the environment.

Timing/Implementation: *Prior to final design approval*

Enforcement/Monitoring: *City of Placerville, Engineering Department*

Mitigation Measure HAZ-2: Prior to bridge demolition and placement removal, the City of Placerville shall retain a qualified professional to test for lead-based paint (LBP), aerially deposited lead (ADL) and asbestos containing materials (ACM) and provide recommendations based on the levels detected, as follows.

- Prior to the construction phase of the project a California licensed abatement contractor will conduct a survey for hazardous levels of soil lead at the project site. Representative samples of exposed shallow soils shall be collected at multiple locations along the project site and analyzed for total lead and soluble lead. Sampling of ADL should be performed in accordance with the requirements of DTSC.
- If LBP and ACM are present at levels requiring abatement and special disposal, the City shall ensure the work is performed in accordance with applicable regulations to protect the environment and public health, which may include disposal at a landfill facility rated for acceptance of hazardous materials, dust abatement measures during the removal of the contamination, or other special handling, as required based on contamination levels. A report documenting the results and abatement and disposal activities shall be submitted to Caltrans, the El Dorado

County Environmental Management Division, and the City Engineering Department to document compliance with regulatory requirements.

Timing/Implementation: *Prior to final design approval*

Enforcement/Monitoring: *City of Placerville, Engineering Department*

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding a reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment were determined to be **potentially significant** without mitigation. Therefore, mitigation measures were required or included, and the impact level would be **less than significant with mitigation**.

Threshold c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The closest school to the proposed project is Sierra Elementary School at 1100 Thompson Way, located 0.20 miles southeast of the proposed project. As described above, limited quantities of miscellaneous hazardous substances would be used in the proposed project area and staging area. Additionally, one hazardous site and hazardous building materials (LBP and ACMs) may be present in the proposed project site and ADL may be present in the soil.

During construction, any existing hazardous soils that may be encountered would pose a hazard for construction workers and the environment. Construction workers typically are at the greatest risk for exposure to contaminated soil. Accidents or spills during transport of hazardous materials or wastes could have the potential to expose the public and the environment to these substances. Soil sampling will be conducted prior to start of construction in order to test for NOA in the project site.

As such the impact is potentially significant, but construction activities would incorporate BMPs and **Mitigation Measure HAZ-1** and **HAZ-2** that would minimize hazards emissions or potential hazard releases from routine transport, use, or disposal of hazardous materials during construction related activities.

Operation of the proposed project would involve use of hazardous materials similar to the existing conditions. This is because the proposed project would not change the use of the Clay Street, Main Street, Cedar Ravine Road, or the Ivy House parking lot. Maintenance activities and products for landscaping, roadway maintenance, and bridge maintenance would remain similar to existing conditions. Therefore, the proposed project operations would not result in hazardous emissions or handling of hazardous materials within one-quarter mile of a school beyond what currently exists.

MITIGATION MEASURES

Implement **Mitigation Measure HAZ-1** and **HAZ-2**

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding hazardous emissions or handling of hazardous materials/substances were determined to be **potentially significant** without mitigation. Therefore, mitigation measures were required or included, and the impact level would be **less than significant with mitigation**.

Threshold 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?

A database report was obtained from EDR in 2016 and 2021 to determine if RECs have been identified within the proposed project vicinity. According the EDR Report, there are twenty-five (25) Leaking Underground Storage Tank (LUST) sites, which are included on the Cortese List of hazardous materials sites compiled pursuant to Government Code Section 65962.5, within ½ mile of the proposed project site. All 25 LUST sites have the regulatory status of "Case Closed" and are not considered a threat to the site. The proposed project area is not within an area with sites pursuant to Government Code Section 65962.5 with known soil or groundwater contamination is noted from the identified site, and therefore, the proposed project would not create a significant hazard to the public or the environment and impact is less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding being located on a site included in Government Code Section 65962.5 were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold e. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

During construction, Clay Street would be closed between Main Street and just north of the existing U.S. Highway 50 (US 50) overpass. Traffic accessing the portion of Clay Street immediately north of US 50 would be detoured via northbound Bedford Avenue to Coleman Street to Clay Street or northbound Mosquito Road to Clay Street. The total detour length is approximately 1 mile. Access to residences along Clay Street would be maintained at all times during construction.

Construction of the intersection modifications at Main Street/Cedar Ravine Road has the potential to cause lane closures or narrowing, or detours, depending on the activity, in the immediate vicinity of the proposed project site, which could also affect

emergency response or evacuation times, which would be potentially significant. To minimize traffic disruption, after consulting with the El Dorado County Fire Protection District and the City Police Department, the City would implement **Mitigation Measure TRAF-1**, which requires a Construction Traffic Management Plan for the construction phase to be utilized throughout the duration of construction activities. The Construction Traffic Management Plan would ensure that emergency access would be maintained and at no time during the construction period will the entire width of a public roadway be closed to emergency vehicle traffic.

Operation of the proposed project would improve current traffic congestion conditions as discussed in **Section 4.10 Transportation and Traffic**, at the proposed project site. Currently, fire trucks routinely would have to wait for a car to pass the bridge before continuing. The proposed project would improve current emergency response times, since the proposed bridge will accommodate two lanes of traffic moving simultaneously. The proposed project would not result in design hazards that could affect intersection or roadway safety and conflicting turn movements, and the wider, two-lane Clay Street Bridge would benefit safe emergency response vehicle passage from its current one-lane configuration. In addition, the Druid Monument would be relocated up to 45 feet west of its current location to a raised concrete island and placed in a non-centralized location between the through lane and the right turn lane of eastbound Main Street to protect against potential traffic collisions, specifically against larger vehicles such as emergency response vehicles.

MITIGATION MEASURES

Implement **Mitigation Measure TRAF-1.**

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding impairing implementation of an emergency plan were determined to be **potentially significant** without mitigation. Therefore, mitigation measures were required or included, and the impact level would be **less than significant with mitigation**.

4.6.6 Cumulative Impacts

The cumulative effect of ongoing development within the proposed project vicinity could increase the use of hazardous materials citywide as a result of construction and activities and operations of the cumulative project list, as outlined in **Section 3.6, Cumulative Projects, Table 3.6-1**.

As discussed above, there would be a less that significant impact in with routine transport, use or disposal of hazardous materials and the proposed project area is not within an area with sites pursuant to Government Code Section 65962.5 with known soil or groundwater contamination.

Construction of the proposed project in combination with other projects being construction at the same time throughout the City, would involve routine hazardous

materials use typically associated with construction activities; however, each project would be regulated through contract specifications. Operation of the proposed project would not involve the use of hazardous materials beyond what currently exists; therefore, it would not add to the cumulative use of hazardous materials within the City. Thus, proposed project's cumulative contribution to impacts associated with hazardous materials use, transport, storage, and disposal would be less than cumulatively considerable.

Construction of the proposed project could result in hazardous materials contamination impacts. Risks related to hazards and hazardous materials typically are localized in nature since they tend to be related to onsite site-specific conditions and/or hazards caused by a project's construction or operation. Lead and asbestos potentially located at the proposed project site would be limited to the building materials within the bridge and roadway itself. Similarly, potential soil contamination at the Ivy House parking lot is limited to that area. As outlined in **Section 3.6, Cumulative Projects,** no additional projects are planned for the Clay Street/Ivy House area. In addition, conformance with existing state and County regulations and implementation of appropriate safety measures during construction of the proposed project, as well as other cumulative projects, would further reduce the impact to a level that would not cause or contribute to any significant cumulative effects.

As mentioned previously, the proposed project would not result in design hazards that could affect intersection or roadway safety and conflicting turn movements, and the wider, two-lane Clay Street Bridge would benefit safe emergency response vehicle passage from its current one-lane configuration. During construction of the proposed project, the City would consult with El Dorado County Fire Protection District and the City Police Department ensuring emergency vehicles have access to the proposed project areas. The proposed project has the potential to combine with other current and future projects that would generate high volumes of traffic on area roadways by creating a cumulative traffic burden on regional roadways; however, given the relatively close proximity of emergency services, the implementation of mitigation measures described above, phasing of project construction within the City, and the fact that most cumulative projects in the project vicinity would not generate high volumes of traffic during construction phases, the potential for a considerable contribution to a cumulative impact to emergency response is unlikely to occur. Therefore, the proposed project's contribution would be less than cumulatively considerable.

4.7 Hydrology and Water Quality

4.7.1 Introduction

This section of the Recirculated Environmental Impact Report (REIR) addresses potential impacts of the proposed project on hydrology and water quality, describes the environmental and regulatory setting, and discusses mitigation measures to reduce impacts where applicable. Information in this section is based on the

Preliminary Hydraulic Study and Scour Analysis (Domenichelli 2025), Water Quality Technical Memorandum (Drake Haglan 2016), and Preliminary Bridge Foundation Report (HDR 2025).

4.7.2 Environmental Setting

The proposed project is located within the Upper American River watershed which originates at the crest of the Sierra Nevada mountain range, west of Lake Tahoe and encompasses 1,850 square miles. The watershed has three forks of the American River: the North, Middle, and South. The City of Placerville (City) ultimately drains to the South Fork American River. The major tributaries contributing flow directly into the South Fork American River are Silver Creek, Slab Creek, Rock Creek, and Weber Creek. Major streams in the entire watershed are the Rubicon River, Duncan Creek, Long Canyon Creek, and Silver Creek. The main reservoirs and lakes in the watershed are French Meadows, Hell Hole, Union Valley, Ice House, Lake Valley, Loon Lake, Silver Lake, Slab Creek, and Stumpy Meadows. The peak runoff from this watershed, where precipitation occurs primarily as snowfall in the upper elevations of the watershed and rainfall in the lower elevations, is typically from March through June (Sacramento River Watershed Program 2010).

Locally, the proposed project area is located within the Weber Creek subbasin and Hangtown Creek planning watershed (Ervin Consulting Group 2010). Hangtown Creek is a tributary to Weber Creek. The proposed project area's drainage generally consists of a network of roadside ditches, channels, and culverts which route to Hangtown Creek or Weber Creek.

4.7.2.1 Regional Climate and Topography

The climate in the City is characterized by sunny, dry summers and relatively wet winters. Precipitation averages 47 inches per year, with snowfall once or twice a year of approximately 5 inches. The greatest amount of rainfall occurs during November through April. Cloudburst storms, sometimes lasting as long as three hours, can occur any time from late fall to early spring, and may occur as an extremely severe sequence within a general winter rainstorm. These high intensity storms can produce peak flows equal to or somewhat greater than those general rainstorms in portions of the City (City of Placerville 1989).

The topography of the project site is relatively flat (with the exception of the creek channel banks) and does not include slopes greater than 20 percent, with elevations ranging from approximately 1,865 feet to 1,925 feet above mean sea level. The proposed project site is generally flat with steep slopes present along Hangtown Creek and the U.S. Highway 50 (US 50) embankments.

4.7.2.2 Surface Water

Locally, the proposed project site is in the Hangtown Creek watershed, which encompasses approximately 9.4 square miles, of which 5.8 square miles (approximately 87 percent) are within the city limits. The Hangtown Creek headwaters are approximately 0.6 mile upstream of the city limits in Smith Flat. Hangtown Creek runs east to west south of U.S. Highway 50 (US 50) until it crosses under US 50 near Placerville Drive where it continues west and terminates at Weber Creek approximately 1.1 miles downstream of the city limits. Weber Creek is a tributary to the South Fork of the American River (Placerville 2005).

HANGTOWN CREEK

Historically, Hangtown creek was a source of water and the location of placer mining in the area. As Placerville grew, Hangtown Creek was used primarily as a sewer and storm drain. Many of the historic buildings on Main Street are built next to and in some cases over the creek. In the late 1800s, construction of the Central Pacific Railroad corridor adjacent to Hangtown Creek further constrained the creek along its northerly bank. Pipe sewers in the 1900s were constructed using Hangtown Creek as the primary route for the aboveground pipelines to convey sewage to the first wastewater treatment plant, and Hangtown Creek continues to serve as the primary alignment to the Hangtown Creek Water Reclamation Facility, which is farther downstream. In the 1990s, the railroad right-of-way was replaced by a rails-to-trails recreational trail, a multi-use paved segment of which (the El Dorado Trail) is located between Hangtown Creek and US 50 (Drake Haglan 2016).

CEDAR RAVINE

Cedar Ravine, a tributary to Hangtown Creek, consists of an open channel, with defined bed and bank that flow freely along Cedar Ravine Road, south of Pacific Street, and transitions to a closed conduit constructed of various materials and geometrics with varying ages beginning near Pacific Street to the outfall at Hangtown Creek. The Cedar Ravine culvert consists of a 234-foot-long open culvert along Cedar Ravine Road, which transitions to a 66-inch corrugated metal pipe extending 286 feet from the intersection of Main Street and Cedar Ravine Road to the outfall at Hangtown Creek (under the Ivy House parking lot). The Cedar Ravine culvert outlets at the creek and is integral with the south abutment/retaining wall of the existing bridge. Under existing conditions, based on hydraulic modeling as described above, the culvert conveys approximately 300 cubic feet per second (cfs) flow. However, when flows in Hangtown Creek are high (i.e. a 50-year storm event), the culvert capacity is reduced

to 269 cfs. The Cedar Ravine culvert is inadequate to convey the 50-year and 100-year event peak flows. Culvert overflow and roadway flooding during large storm events are a result of the capacity limits of the culvert (Domenichelli 2025).

CLAY STREET BRIDGE

The Clay Street Bridge is supported on concrete wall abutments at the banks and a central concrete pier, which appears to merge with the channel walls to the east of bridge and is assumed to be part of the channel structure for Cedar Ravine. Existing channel banks are moderately steep to nearly vertical and heavily vegetated. Walls and hardened bank areas are present both up- and downstream of the Clay Street Bridge. The channel bottom is approximately 10 feet below the bridge deck (HDR 2025). The top of the existing bridge deck (not including railings) is at an elevation of 1,867.25 feet above mean sea level, and the top soffit of the bridge arch is at 1,864.75 feet above mean sea level.

Multiple utilities, including sewer lines, manhole risers, and a water line, run below or adjacent to the Clay Street Bridge. Multiple drain/culvert pipes discharge to the stream in the vicinity of the bridge, including a 24-inch pipe near the eastern side of the northern abutment and an approximately 6- to 8-inch-diameter drain approximately 10 feet west of the southern abutment. Additional drainpipes are present at random intervals along retaining structures on both sides of Hangtown Creek (HDR 2025).

Based on the model, the existing bridge is predicted to nearly overtop during both the 50-year and 100-year event with no clearance at the top soffit at the bridge arch under existing conditions (Domenichelli 2025). The California Department of Transportation's (Caltrans) 2014 Caltrans Bridge Inspection Report also notes that the bridge does not pass 100-year stormwater flows.

4.7.2.3 Flooding

Hangtown Creek has been substantially constrained through the City as a result of adjacent development and existing aboveground trunk sewer lines within the creek. As a result, there has been a long history of flood problems. Because Hangtown Creek is constrained to a small area, large storm events are amplified (Drake Haglan 2016). Data indicated that roadway flooding could occur as a result of capacity limitations of the Cedar Ravine culvert. The existing bridge nearly overtops during the 50-year and 100-year event with no clearance to the soffit (Domenichelli 2025).

The Federal Emergency Management Agency (FEMA) (2008) has delineated an area of 100-year flood hazard along Hangtown Creek. From approximately Mosquito Road on the east and extending west through Placerville, the area is designated Zone AE, indicating a 100-year floodplain with base flood elevations determined. Zone AE is between Main Street and approximately the El Dorado Trail (south of US 50). In addition, FEMA has delineated a regulatory floodway within Hangtown Creek. The floodway is the channel of a stream plus any adjacent floodplain area that must be

kept free of encroachment so that the 1 percent annual chance flood can be carried without substantial increases in flood heights.

4.7.2.4 Groundwater

The California Department of Water Resources (DWR) has delineated groundwater hydrologic basins throughout the State. The proposed project site is not in one these basins, and the nearest basin is the South American Groundwater Subbasin approximately 20 miles south-southwest of the proposed project site. Some groundwater likely occurs in isolated pockets, including shallow alluvial materials associated with surface waters or fractures in the underlying bedrock (Drake Haglan 2016).

Small areas of seepage have been observed in the Hangtown Creek channel bank near the north abutment of the Clay Street Bridge, approximately one foot above the creek water surface. No visible seepage was noted away from the stream banks along the El Dorado Trail or neighboring parking areas. Groundwater is assumed to be at or near the level of Hangtown Creek in the immediate vicinity of the bridge. Farther from the creek, groundwater depth may vary greatly with surrounding topography and underlying geology (Taber 2007).

4.7.3 Regulatory Setting

Additional regulations related to biological resources, including wetlands, waters of the U.S., and water quality are presented in **Section 4.3 Biological Resources**.

4.7.3.1 Federal

U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)

The USEPA was established in 1970 to consolidate in one agency a variety of Federal research, monitoring, standard-setting, and enforcement activities to ensure environmental protection. The USEPA's mission is to protect human health and to safeguard the natural environment - air, water, and land - upon which life depends. The USEPA works to develop and enforce regulations that implement environmental laws enacted by Congress, is responsible for researching and setting national standards for a variety of environmental programs, and delegates to states and tribes the responsibility for issuing permits and for monitoring and enforcing compliance. Where national standards are not met, the USEPA can issue sanctions and take other steps to assist the states and tribes in reaching the desired levels of environmental quality.

FEDERAL TOXIC SUBSTANCES CONTROL ACT/RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)/HAZARDOUS AND SOLID WASTE ACT (HSWA)

The Federal Toxic Substances Control Act (1976) and the RCRA of 1976 established a program administered by the USEPA for the regulation of the generation,

transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the HSWA, which affirmed and extended the “cradle to grave” system of regulating hazardous wastes.

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT/SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT (CERCLA)

CERCLA, commonly known as Superfund, was enacted by Congress on December 11, 1980. This law (U.S. Code Title 42, Chapter 103) provides broad Federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites; provides for liability of persons responsible for releases of hazardous waste at these sites; and, establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enables the revision of the National Contingency Plan (NCP). The NCP (Title 40, Code of Federal Regulation [CFR], Part 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List (NPL). CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

CLEAN WATER ACT (CWA)/SPILL, PREVENTION, CONTROL, AND COUNTERMEASURE (SPCC) RULE

The CWA (33 U.S.C. Section 1251 et seq., formally the Federal Water Pollution Control Act of 1972), was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. As part of the CWA, the USEPA oversees and enforces the Oil Pollution Prevention regulation contained in Title 40 of the CFR, Part 112 (Title 40 CFR, Part 112), which is often referred to as the “SPCC rule” because the regulations describe the requirements for facilities to prepare, amend, and implement SPCC plans. A facility is subject to SPCC regulations if a single oil storage tank has a capacity greater than 660 gallons, or the total above ground oil storage capacity exceeds 1,320 gallons, or the underground oil storage capacity exceeds 42,000 gallons, and if, due to its location, the facility could reasonably be expected to discharge oil into or upon the “navigable waters” of the U.S.

Other Federal regulations overseen by the U.S.EPA relevant to hazardous materials and environmental contamination include Title 40 CFR Chapter 1, Subchapter D – Water Programs and Subchapter I – Solid Wastes. Title 40 CFR Chapter 1, Subchapter D, Parts 116 and 117 designate hazardous substances under the CWA. Title 40 CFR Part 116 sets forth a determination of the reportable quantity for each substance that is designated as hazardous. Title 40 CFR Part 117 applies to quantities of designated substances equal to or greater than the reportable quantities that may be discharged into waters of the U.S.

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA)

OSHA's mission is to ensure the safety and health of America's workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. OSHA staff establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation programs. OSHA standards are listed in Title 29 CFR Part 1910.

4.7.3.2 State Plans, Policies and Regulations

PORTER-COLOGNE WATER QUALITY CONTROL ACT

California's Porter-Cologne Act, enacted in 1969, provides the legal basis for water quality regulation within California. It predates the Clean Water Act (CWA) and regulates discharges to Waters of the State. Waters of the State include more than Waters of the US, such as groundwater and surface waters not considered Waters of the US. Additionally, the Porter-Cologne Act prohibits discharges of "waste" as defined and this definition is broader than the CWA definition of "pollutant". Discharges under the Porter-Cologne Act must be regulated by the Waste Discharge Requirements (WDRs) Program, which may regulate the project even when the discharge is already permitted or exempt under the CWA.

The State Water Resources Control Board (SWRCB) and Regional Water Quality Control Board (RWQCB) are responsible for establishing the water quality standards (objectives and beneficial uses) required by the CWA and regulating discharges to ensure compliance with the water quality standards. Details regarding water quality standards in a study area are contained in the applicable RWQCB Basin Plan. States designate beneficial uses for all water body segments, and then set criteria necessary to protect these uses. Consequently, the water quality standards developed for particular water segments are based on the designated use and vary depending on such use. In addition, each state identifies waters failing to meet standards for specific pollutants, which are then state-listed in accordance with CWA Section 303(d). If a state determines that waters are impaired for one or more components and the standards cannot be met through point source controls, the CWA requires the establishment of Total Maximum Daily Loads (TMDLs). TMDLs specify allowable pollutant loads from all sources (point, non-point, and natural) for a given watershed.

STATE WATER RESOURCES CONTROL BOARD

Created by the California State Legislature in 1967, the SWRCB holds authority over water resources allocation and water quality protection within the state. The five-member SWRCB allocates water rights, adjudicates water right disputes, develops statewide water protection plans, establishes water quality standards, and guides the nine RWQCBs. The mission of SWRCB is to, "preserve, enhance, and restore the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations."

CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

As authorized by the Porter-Cologne Water Quality Control Act, the Central Valley Regional Water Quality Control Board's (CVRWQCB) primary function is to protect the quality of the waters within its jurisdiction, including the proposed project site, for all beneficial uses. State law defines beneficial uses of California's waters that may be protected against quality degradation to include, but not be limited to: domestic; municipal; agricultural and industrial supply; power generation; recreation; aesthetic enjoyment; navigation; and preservation and enhancement of fish, wildlife, and other aquatic resources or preserves. The CVRWQCB implements water quality protection measures by formulating and adopting water quality control plans (referred to as basin plans, as discussed below) for specific groundwater and surface water basins, and by prescribing and enforcing requirements on all agricultural, domestic, and industrial waste discharges. The CVRWQCB oversees many programs to support and provide benefit to water quality, including wastewater discharges (including the NPDES); Water Quality Certification; and Watershed Management.

NPDES GENERAL PERMIT FOR DISCHARGES OF STORMWATER ASSOCIATED WITH CONSTRUCTION ACTIVITIES

Construction activities disturbing one acre or more of land are subject to the permitting requirements of the NPDES General Construction Activity Permit for Discharges of Storm Water Runoff Associated with Construction Activity (General Construction Permit). The permit requires a risk based permitting approach, dependent upon the likely level of risk impacted by a project. The permit also contains several additional compliance items, including (1) mandatory Best Management Practices (BMPs) to reduce erosion and sedimentation, which may include incorporation of vegetated swales, setbacks and buffers, rooftop and impervious surface disconnection, bioretention cells, rain gardens, rain cisterns, implementation of pollution/sediment/spill control plans, training, and other structural and non-structural actions; (2) sampling and monitoring for non-visible pollutants; (3) effluent monitoring and annual compliance reports; (4) development and adherence to a Rain Event Action Plan; (5) requirements for the post-construction period; (6) monitoring of soil characteristics on site; and (7) mandatory training under a specific curriculum. Under the revised permit, BMPs will be incorporated into the action and monitoring requirements for each project site, as compared to the existing permit, where specific BMPs are implemented via a Storm Water Pollution Prevention Plan (SWPPP).

4.7.3.3 Regional Plans, Policies, and Regulations

CITY OF PLACERVILLE GENERAL PLAN (DRAFT)

The City's General Plan Section V (Natural, Cultural and Scenic Resources) includes policies to conserve water resources and protect water quality within the Placerville area. Policies that are applicable to the proposed project's environmental effects related to hydrology and water resources are listed:

Natural, Cultural and Scenic Resources Element

Goal A: To conserve water resources and protect water quality within the Placerville area.

Policy A.5: The City shall require in new development sound anti-pollution practices to protect water quality.

Health and Safety

Goal C: To prevent loss of lives, injury, and property damage due to flooding.

Policy C.1: The City shall continue to participate in the National Flood Insurance Program. To this end, the City shall ensure that local regulations are in full compliance with standards adopted by the Federal Emergency Management Agency

Policy C.5: The City shall provide for channel improvements to and tree and brush clearance along watercourses in Placerville to reduce flooding.

HANGTOWN CREEK MASTER PLAN

Hangtown Creek Master Plan contains goals, objectives, policies, standards, and watershed based implementation measures to protect the watershed. The plan sets forth goals, objectives, policies, and standards addressing enhancement and maintenance of riparian and aquatic habitat; watershed protection, erosion, and flood control; aesthetic history and prehistoric values; and creek access and public spaces, among other topics.

Goal 2: Watershed Protection, Erosion, and Flood Control

Objective 1: Encourage stewardship techniques for watershed protection that utilize development standard recommendations that provide for protecting water quality and reducing stormwater-related flooding.

Policy 1: No new structures improvements, or grading activities shall be allowed that do not enhance riparian habitat.

- Implementation Measure 1: The City shall amend its General Plan and ordinance code as necessary to maintain a 50-foot setback area adjacent to all "rural reaches" of Hangtown Creek.
- Implementation Measure 2: The City shall amend its General Plan ordinance code as necessary to maintain a 15-foot setback area adjacent to all "urban reaches" of Hangtown Creek.
- Implementation Measure 3: The City shall amend its General Plan ordinance code as necessary to maintain a 25-foot setback area adjacent to all "waterways" of the Hangtown Creek Watershed (identified Plan in accordance with the General Plan goal: "The City shall amend the Zoning Ordinance to require setbacks from watercourses in accordance with Policy V.D.I." and the General Plan Implementation: "The City shall make every effort to protect riparian vegetation. To this end, buildings and improvements shall be setback from watercourses.")

Policy 2: Encourage increased shading throughout the creek area to maintain water temperatures in Hangtown Creek that support the native cold-water fishery.

Policy 3: The City is encouraged to seek funding for the installation of filtration systems to treat stormwater run-off originating from existing parking lots.

Policy 5: Reduce stormwater-related flooding and damage to stream and wetland habitat, and increase infiltration.

- Implementation Measure 1: City shall adopt design guidelines that include the following practices:
  - Minimize impervious cover to improve water absorption;
  - Spread run-off over pervious areas to improve water absorption;
  - Utilize narrow roads to reduce paved (impervious) surface;
  - Utilize open-channel drainage to improve water absorption;
  - Protect natural areas to improve water holding capacity in the watershed; and,
  - Maintain stream riparian areas to improve water-holding capacity.
- Implementation Measure 2: The City shall work with Community Pride, the Hangtown Creek Stewardship Committee and other interested organizations and agencies to encourage:
  - Shading parking lots with vegetation to reduce heat load
  - Protecting riparian areas with stream setbacks
  - Restricting the removal of native riparian vegetation

Policy 6: The City shall ensure that channel improvements to creeks and tree and brush clearance activities along creeks within the city do not unnecessarily disturb riparian vegetation

- Implementation Measure 1: Prohibit culverting, lining or piping of streams, except at driveways and road crossings.
- Implementation Measure 2: Wherever feasible, replace concrete channels with natural unlined channels.

  Implementation Measure 3: For parking lots of 25 or more stalls, commercial sites with 10,000 square feet or more, and houses of 10 units or more implement run-off management plans that retain the first 0.75 inches of rainwater (stormwater) on site.

CITY OF PLACERVILLE MS4 PERMIT

The City has been specifically designated by the CVRWQCB as the owner and operator of a General Small MS4 Permit. The primary goal of the General Small MS4 Permit is to protect water quality from urban runoff pollution. This is to be accomplished by addressing the various ways storm water quality can be impacted by the public, municipal activities, development and redevelopment. Compliance will

require a coordinated effort by City staff (administration, community development, public works, and operation and maintenance) to implement the Storm Water Management Plan (SWMP). The General Small MS4 Permit requires that the City:

- Submit a Notice of Intent to comply with the terms of the Small MS4 General Permit to the California Regional Water Quality Control Board, Central Valley Region.
- Develop a SWMP that includes Best Management Practices (BMPs) that address the six minimum program areas identified below. The selected BMPs must reduce pollutants in storm water runoff to a technology-based standard of Maximum Extent Practicable (MEP) to protect water quality. The SWMP must also include measurable goals and timetables for implementation. The six minimum control measures are:
  1) Public Education and Outreach on Storm Water Impacts;
  2) Public Involvement/Participation;
  3) Illicit Discharge Detection and Elimination;
  4) Construction Site Storm Water Runoff Control;
  5) Post-Construction Storm Water Management in New Development and Redevelopment; and
  6) Pollution Prevention/Good Housekeeping for Municipal Operations.
- Conduct construction site inspections to verify that BMPs are in place and properly maintained.
- Conduct surveillance monitoring to confirm that illicit non-storm water discharges are detected and eliminated.
- Submit annual reports to the CVRWQCB describing progress in SWMP implementation.

4.7.4 Methodology and Thresholds of Significance

4.7.4.1 Methodology

Evaluation of the proposed project's hydrology and water quality impacts was based on the results and recommendations identified in the proposed project's Hydrology/Hydraulics Report (Domenichelli 2023), Water Quality Technical Memorandum (Drake Haglan 2016), and Geotechnical Investigation (Taber 2007). The analysis of the hydrology for Hangtown Creek and Cedar Ravine was performed with HEC-HMS version 3.4.

As part of the development of the preliminary design for the proposed replacement bridge, and to ensure the new bridge would not cause or exacerbate flood hazards, a hydraulic model of Hangtown Creek water elevations was created to predict where the creek water elevation would be relative to the existing bridge itself during the 50-year and 100-year storm events. The model takes into account features that would tend to impede flows from structures such as the bridge deck and abutments.

Other sources of information used to describe existing conditions and evaluate impacts include the City General Plan.

4.7.4.2 Thresholds

Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects associated with hydrology and water quality. The following threshold questions are used to evaluate the impacts on hydrology and water quality:

a) 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 onsite or offsite?

b) 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 onsite or offsite?

c) 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 site or off site?

d) 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?

e) Otherwise substantially degrade water quality?

f) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

However, the Initial Study/Notice of Preparation (IS/NOP) prepared for the proposed project (**Appendix A**) determined that the proposed project would have no impact associated with depleting groundwater supplies. The proposed project would not result in the placement of housing in a 100-year flood zone. The proposed project would also have no impact related to inundation by dam failure, seiche, tsunami, or mudflow, as there is no large water body in the area capable of generating such an event. Therefore, there would be no impact to the following thresholds of significance that are not discussed further:

g) 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)?

h) 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?

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?

j) Inundation by seiche, tsunami, or mudflow?

4.7.5 Project Impacts

Threshold a. Violate any water quality standards or waste discharge requirements?

CONSTRUCTION

Construction activities from the proposed project have the potential to generate pollutants and sediment that could affect water quality via stormwater runoff that drains to Hangtown Creek and Cedar Ravine. Construction would include the use of heavy equipment, which requires oil, grease, and fuels and other chemical constituents involved in construction. Spills or leaks from construction equipment could also be conveyed in stormwater that flows toward the creeks, which could affect water quality. The proposed project would include BMPs, including spill prevention measures, to address the accidental or inadvertent release of oil, grease, or fuel into adjacent waterways. Such measures would include requiring the storage of reserve fuel and the refueling of construction equipment within designated construction areas and the staging area, and inspection of vehicles for oil and fuel leaks. Further, the City would adhere to all applicable laws and regulations related to construction, environmental protection, and health and safety during construction and operation of the proposed project.

Temporary disturbance to the stream banks of Hangtown Creek would occur during replacement of the bridge and reconstruction of the Cedar Ravine culvert outlet. Approximately 150 feet of the Cedar Ravine culvert between Main Street and the existing Clay Street Bridge would be replaced or reconstructed due to the proposed parking lot reconstruction and bridge replacement. Disturbance of stream banks may loosen soils, resulting in a temporary increase in erosion of sediment, which could have water quality impacts. New bridge approaches from the realigned Clay Street would also be constructed, which would expose soil to erosion and could contribute sediment to runoff entering Hangtown Creek. Groundwater is shallow near Hangtown Creek, and temporary dewatering may be necessary to allow proper placement of project features. Construction dewatering, if necessary, would be required to comply with the dewatering provisions of the Construction General Permit or obtain coverage under the CVRWQCB's Low-Threat Discharges to Surface Water permit. Groundwater discharged directly into Hangtown Creek may require treatment to minimize adverse water quality effects.

Stream flow in Hangtown Creek would be diverted into pipe(s) through the active construction zone. The diversion would be established in conformance with City and County specifications as well as California Department of Fish and Wildlife (CDFW),

Central Valley RWQCB, U.S. Army Corps of Engineers (USACE), and U.S. Fish and Wildlife Service (USFWS) regulatory requirements. The stream diversion would be constructed within the existing channel to protect water flowing in Hangtown Creek from demolition and construction activities. Materials to construct the diversion would consist of pipe(s) as needed to convey flow rates anticipated during construction, and sandbags and plastic sheeting to construct diversion dams in the channel upstream and downstream of the site. All stream diversion work would be contained within the area of disturbance. Equipment used would be light truck-mounted cranes above the channel, with small earthwork equipment and laborers within the channel between the diversion dams. The operational timeline for the stream diversion would likely be late April through October, depending on the permit restrictions imposed by the resource agencies.

As described in **Threshold d** in **Section 4.3, Biological Resources,** prior to construction, the City would be required to obtain the following permits to allow the filling of 0.001 acre of intermittent stream: CWA Section 404 Nationwide Permit #14 (Linear Transportation Projects); California Fish and Game Code (CFGC) Section 1600–1602 Streambed Alteration Agreement; and CWA Section 401 Water Quality Certification.

Pavement removal on Clay Street, Main Street and Cedar Ravine Road and the Ivy House parking lot would expose soil that would require grading and other earthwork to construct the realigned Clay Street. This activity would temporarily expose soil to wind and water erosion, and heavy equipment use could be a source of pollutants that could enter stormwater runoff.

The proposed project would result in more than one acre of disturbance and therefore would be required to comply with the State's Construction General Permit requirements, which include preparation of a SWPPP. The SWPPP must include BMPs to reduce construction effects on receiving water quality by implementing erosion control measures and reducing or eliminating non-stormwater discharges. Examples of typical construction BMPs included in SWPPPs include, but are not limited to, using temporary mulching, seeding, or other suitable stabilization measures to protect uncovered soils; storing materials and equipment to ensure that spills or leaks cannot enter the storm drain system or surface water; developing and implementing a spill prevention and cleanup plan; and installing sediment control devices such as gravel bags, inlet filters, fiber rolls, or silt fences to reduce or eliminate sediment and other pollutants from discharging to the drainage system or receiving waters.

Chapter 7 of the City Code contains standards regarding grading, erosion, and sediment control). The Grading Ordinance regulates grading on private property in the incorporated area of the city. The purpose of the ordinance, in part, is to avoid pollution of watercourses with nutrients, sediments, or other earthen materials generated on or caused by surface runoff on or across the permit area. The proposed

project would comply with the provisions of the ordinance as part of the grading activities for the proposed project.

OPERATIONAL IMPACTS

The potential for urban pollutants to be generated in stormwater runoff typically depends on the amount of impervious surfaces (e.g., roadways and parking lots) and land use activities that would contribute pollutants. The potential impacts on the water quality in Hangtown Creek and Cedar Ravine would be a function of the rate and volume of runoff discharged to the creeks through storm drains and/or overland flow and changes in impervious surface as a result of the operations of the proposed project.

Clay Street at the bridge approach and the Clay Street Bridge surface would be widened compared to existing conditions, which would slightly increase the amount of impervious surface that would generate stormwater runoff containing urban pollutants. Stormwater runoff that is currently generated on the proposed project site contains urban pollutants such as metals, oil, grease, sediment, bacteria, nutrients, and potentially herbicides and pesticides associated with maintenance. The proposed project would not change the types of land uses on or surrounding the proposed project site; there would continue to be roadways and a parking lot, with some landscaping and vegetation. The types of pollutants would not change as compared to existing conditions. An increase in pollutant loads would not result because the proposed project would not increase the number of vehicles using Main Street, Clay Street, or Cedar Ravine Road (see **Threshold a** in **Section 4.10, Transportation and Traffic**) that could be a source of pollutants. The proposed project would reduce the number of parking spaces in the Ivy House parking lot, so there would be fewer vehicles at that location which would be a source of pollutants. The Locust Avenue lot has been identified as the nearest City lot that may be used as replacement parking for the spaces lost at the Ivy House parking lot. The Locust Avenue lot was owned and leased by Caltrans prior to the City's acquisition of the lot in 2014, and it is unknown what BMPs may be present. As such, through the use of replacement parking at the Locust Avenue lot, the project could result in an impact on stormwater quality because vehicles would park there.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE

Impacts regarding violating water quality standards or waste discharge requirements were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold b. 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 onsite or offsite?

The proposed project would not alter the course of Hangtown Creek or Cedar Ravine, nor would it alter the existing drainage pattern of the site.

Construction activities would involve soil disturbance, excavation, cutting/filling, and grading activities could result in increased erosion and sedimentation into Hangtown Creek. In addition, the use of large construction equipment may compress soil within the staging areas, which could lead to a redirection in permeability, an increase in site water runoff, and an increase in erosion or siltation to occur causing a potentially significant impact. The proposed project would comply with City, the California Building Code (CBC) standards, and BMPs pertaining to erosion control prevention, such as the use of silt fencing and fiber rolls, through the development of a SWPPP. The SWPPP would also comply with NPDES General Construction, CWA Section 404, and CWA Section 401 and CDFW Section 1602 permitting requirements for preventing erosion and siltation at the construction site. Additionally, any temporary construction areas would be revegetated, as required through **Mitigation Measure BIO-3**.

Standard stormwater and erosion control BMPs, such as silt fences and fiber rolls, would be implemented during construction to reduce erosion or siltation at or around the proposed project site.

In accordance with the City's Storm Water Management Plan and applicable MS4 requirements, low impact design (LID) features will be incorporated into project design. The City would be responsible for long-term maintenance and monitoring of the BMPs to ensure their effectiveness in reducing pollutants in runoff.

As stated in **Threshold a**, a temporary diversion system would be installed in order to isolate and dewater the work area so that the proposed construction activities can occur. During the temporary stream diversion, Hangtown Creek water flows would be redirected as a result. Hangtown Creek would be returned to pre-project conditions after construction completion.

MITIGATION MEASURES

Implement **Mitigation Measure BIO-3**.

LEVEL OF SIGNIFICANCE

Impacts regarding substantially altering the existing drainage pattern of the site or area were determined to **potentially significant** without mitigation. Therefore, mitigation measures were required or included, and the impact level remains **less than significant with mitigation.**

Threshold c. 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 site or off site?

The bridge surface and Clay Street would be widened, Clay Street would be realigned to form a four-way intersection with Main Street and Cedar Ravine Road, and the Ivy House parking lot would be reconfigured. This has the potential to slightly increase the amount of impervious surface that would increase the amount of surface runoff compared to existing conditions. Increases in the rate or amount of surface runoff have the potential to cause flooding on or off site; however, the amount is not expected to be substantial.

Because the proposed project could increase the rate and/or volume of surface runoff compared to existing conditions, the project has the potential to cause or exacerbate flooding on or off site; however, the Cedar Ravine drainage culvert, which outlets into Hangtown Creek, would be reconstructed without reducing its existing hydraulic capacity or altering its fundamental drainage function. The existing potential for culvert surcharge and roadway flooding during major storm events is attributable to the existing culvert capacity and Hangtown Creek backwater conditions and would not be created or exacerbated by the proposed project.

Additionally as mentioned in **Threshold b**, in accordance with the City's Storm Water Management Plan and applicable MS4 requirements, LID features would be incorporated into project design, and there would be long-term maintenance and monitoring of the BMPs to ensure their effectiveness in reducing pollutants in runoff.

The proposed project would remove the existing bridge and construct a new bridge designed to current structural and geometric standards. Operation of the proposed project would be similar to existing conditions. The proposed project would not alter the course of Hangtown Creek or Cedar Ravie nor would it alter the existing drainage pattern of the site.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding substantially increasing the rate or amount of surface runoff were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold d. 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?

The bridge surface and Clay Street would be widened, and the Ivy House parking lot would be extended farther north. This has the potential to increase the amount of impervious surface that would generate stormwater runoff compared to existing conditions, although the amount is not expected to be substantial. Increases in the rate or amount of stormwater runoff have the potential exceed storm drain capacity if the existing system is not sufficient or if the rate or volume of stormwater entering a natural channel raises water surface elevations. The Cedar Ravine culvert, which outlets into Hangtown Creek, would be relocated and reconstructed in conjunction with the bridge replacement, which would allow existing capacity to be maintained.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding substantially increasing the rate or amount of stormwater runoff were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold e. Otherwise substantially degrade water quality?

Construction of the proposed project would include soil-disturbing activities that could result in erosion and sedimentation, as well as the use of harmful and potentially hazardous materials required to operate vehicles, equipment, and project components. The transport of disturbed soils or the accidental release of potentially hazardous materials could result in water quality degradation; however, as discussed above, the potential for water quality impacts to occur would be minimized through implementation of BMPs, SWPPP and compliance with all necessary project permits.

Operation of the proposed project would involve the handling and use of some hazardous substances (e.g. solvents, paints, fuels); however, the handling of such materials and the frequency would be similar to existing conditions. The amount and types of hazardous materials would be limited and would be on-site only for the duration of construction activities (approximately 9-12 months). The types of hazardous waste that would be used are not acutely hazardous substances as defined in the California Health and Safety Code. The use, storage, transportation, and disposal of hazardous materials is highly regulated, and the City requires its contractors to comply with all applicable laws and regulations, including Caltrans' construction standard specifications. When used properly, the types and amounts of hazardous materials that would be used during construction would not pose a

substantial health risk to construction workers, residents, employees, visitors, and school-age children on or within the vicinity of the proposed project area.

The implementation of a stormwater pollution prevention plan (SWPPP) and BMPs would minimize the potential for hazardous materials used during construction to be discharged to Hangtown Creek or Cedar Ravine. SWPPPs are required by the State as part of the Construction General Permit and compliance monitored by the City. BMPs that would be implemented by the construction contractor would include a hazardous materials control and spill response plan, to regulate the use of hazardous materials, as well as the use of straw waffles, berms, or similar barriers to reduce the potential for contaminated runoff. Further BMP discussion related to SWPPP and General Construction Permits

Further, the project operator would be required to prepare and submit a drainage plan to the City that would include post-construction structural and non-structural BMPs intended to address drainage related water quality impacts. In addition, the proposed project would make use of source controls, such as LIDs and BMPs, and discharge prohibitions as required by applicable water quality related permits would be enforced. For all of the foregoing reasons, the project is not expected to substantially degrade water quality and the impact is less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding otherwise degrading water quality were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold f. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

The proposed project would replace the Clay Street Bridge, which is in a FEMA Zone AE and regulatory floodway. The proposed project would not cause or increase the potential for overtopping and flooding the bridge deck because it would be designed to pass flows for the 100-year storm and the 50-year storm. The proposed bridge deck would have 1.73 feet of clearance between the deck soffit and the surface water elevation under a 50-year storm event, and there would be 1-foot of clearance between the deck soffit and the surface water elevation under 100-year event, which exceeds freeboard and clearance requirements (Domenichelli 2023).

FEMA requires that Zone AE be kept free of encroachment so that the 100-year flood can be carried without substantial increases in flood heights. **Table 4.7.1** compares water surface elevations between existing conditions and proposed project conditions, based on the results of the hydraulic modeling. The results show no difference in

water surface elevations downstream of the Clay Street Bridge, and upstream water surface elevations would decrease for the 100-year event and the 50-year event. The model also indicates that the velocity of water flowing under the Clay Street Bridge would be slower than existing conditions. Therefore, the project would not place a structure within the 100-year flood plain that would impede or redirect flood flows, and the impact is less than significant.

TABLE 4.7.1 COMPARISON OF WATER SURFACE ELEVATIONS (WSE) AND VELOCITIES

	100-YEAR EVENT			50-YEAR EVENT		
	WSE DOWNSTREAM OF BRIDGE (FEET)	WSE UPSTREAM OF BRIDGE (FEET)	VELOCITY AT BRIDGE (FEET PER SECOND)	WSE DOWNSTREAM OF BRIDGE (FEET)	WSE UPSTREAM OF BRIDGE (FEET)	VELOCITY AT BRIDGE (FEET PER SECOND)
Existing Bridge	1,865.84	1,869.16	11.33	1,865.06	1,868.38	10.57
With Proposed Bridge Replacement	1,865.53	1,868.50	8.2	1,865.26	1,867.24	7.95
Difference	-0.31	-0.66	-3.13	-0.20	-1.14	-2.62

Source: Domenichelli 2023

MITIGATION MEASURES

None Required

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding placing structures within the 100-year flood area were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

4.7.6 Cumulative Impacts

Continued development and urbanization, as outlined in **Section 3.6, Cumulative Projects**, is occurring within the Hangtown Creek watershed. Construction and operation of the proposed project could result in water quality impacts, although such impacts are not substantial due to the nature of the proposed project (bridge replacement and roadway realignment). The proposed project would implement BMPs, obtain and comply with regulatory permits and develop a SWPPP. Other past, present, and reasonably foreseeable future projects have undergone or will undergo evaluation for hydrology and water quality impacts and would be required to implement project-specific measures, as well as comply with federal, State, and local regulations and implement project-specific permits and BMPs. Therefore, there is not

a significant cumulative impact relating to hydrology and water quality impacts. The proposed project would not combine with past, present, or reasonably foreseeable future projects in a manner that would significantly adversely affect water quality because all such projects must comply with applicable regulations to avoid potential water quality impacts, as well as project-specific measures where regulatory compliance would avoid significant impacts. As such, Construction and operation of the proposed project and cumulative projects listed in **Table 3.6-1** would be less than cumulatively considerable for water quality impacts.

In addition, the proposed project would provide sufficient space between the bridge soffit and water surface elevation during a storm event to pass flows; therefore, the proposed project would not exacerbate or cause flood hazards on the bridge deck, along Clay Street, El Dorado Trail, Main Street, or Cedar Ravine Road, and at land uses surrounding these facilities. As such, the proposed project would not result in a cumulative contribution to flooding along Hangtown Creek and would result in an improvement over existing conditions.

4.8 Land Use and Planning

4.8.1 Introduction

This section of the Recirculated Environmental Impact Report (REIR) addresses potential land use impacts that would result from the Clay Street Bridge Replacement Project (proposed project). The following discussion describes the affected environment and regulatory setting, impacts on land use and planning that would result from implementation of the proposed project, consistency with relevant plans, goals, and policies from agencies with jurisdiction over the proposed project area, including compatibility with surrounding land uses, and provides measures, where applicable, to reduce or avoid adverse impacts.

4.8.2 Environmental Setting

The City of Placerville's (City's) physical character is that of a foothill landscape with a gold rush heritage and a rural, small town atmosphere. The City is a vital hub of local and regional commerce and functions as a leader in the region in its capacity as the seat of El Dorado County's government (City of Placerville 1992). The City has focused on two main considerations regarding land use planning: the desire to retain the City's unique heritage and character, and the need to address problems presented by the City's unique topographical features. The proposed project is in a developed area of relatively flat topography. The City's goal is to initiate community design policies to produce a sense of continuity between old and new, to minimize erratic and peripheral approaches to planning and development and to draw on the City's heritage to establish a clear identity (City of Placerville 1992).

The proposed project site is located on the edge of the downtown historic area of the City and includes transportation facilities (Clay Street, Main Street, and Cedar Ravine Road) surrounded by general land uses of commercial, residential, and recreational. Specifically, the City's General Plan (City of Placerville 2016) identifies the land use designations surrounding the proposed project as CBD (Central Business District), C (Commercial), BP (Business Professional), HDR (High-Density Residential), and MDR (Medium Density Residential). The City's Zoning Ordinance and Zoning Map (City of Placerville 2021) identify the zone classifications surrounding the proposed project to include C, CBD, R-3 (Multi-Family Residential, 12 dwellings per acre), and R1-6 (Single Family Residential 6000 square-foot minimum), and Business Professional (BP). Additionally, the proposed project vicinity overlaps with two locally designated historic districts, the Bedford Avenue-Clay Street Historic Residential District and the Cedar Ravine Historic Residential District.

As a largely self-contained community in which people live, work, and shop, the goal of future land use policies as outlined in the City's General Plan is to preserve both the rural character and the successful mixed-use pattern of development in Placerville as the City grows. To this end, active retail and commercial uses that are easily

approached on foot are strongly encouraged in street level development, with residential or office uses on upper floors (City of Placerville 1992).

4.8.3 Regulatory Setting

4.8.3.1 Federal

There are no federal regulations related specifically to land use issues. Certain federal regulations that are applicable to the proposed project, such as for Air Quality and Biological Resources, are discussed in the respective Chapters of the REIR.

FEDERAL HIGHWAY ADMINISTRATION

Applicable federal criteria for analyzing the impact that a transportation project has on the existing land uses are provided by Federal Highway Administration (FHWA). The FHWA Technical Advisory – Guidance for Preparing and Processing Environmental (National Environmental Policy Act) and Department of Transportation Act-Section 4(f) documents prepared by the U.S. Department of Transportation, FHWA, 1987, states that:

This discussion [of land use] should identify the current development trends and the State and/or local government plans and policies on land use and growth in the area which will be impacted by the project.

The guidance recommends that the land use discussion assesses the consistency of the alternatives with the comprehensive development plans adopted for the area and (if applicable) other plans used in the development of the transportation plan. The secondary social, economic, and environmental impacts of any substantial, foreseeable, induced development should be presented for the proposed project, including adverse effects on existing communities. Where possible, the distinction between planned and unplanned growth should be identified.

4.8.3.2 State Plans, Policies and Regulations

CALIFORNIA ENVIRONMENTAL QUALITY ACT

The California Environmental Quality Act (CEQA) establishes that a significant effect on the environment involves an adverse change to the physical environment. Pursuant to the CEQA Guidelines, a project's impact related to land use planning is evaluated in terms of physically dividing an established community, compatibility with existing land uses and consistency with local plans and other local land use controls (i.e., general plans, zoning codes, specific plans, etc.) such that if conflicts do exist, would the conflict result in a significant environmental impact. This is discussed in additional detail in the methodology and impacts section below.

CALIFORNIA GOVERNMENT CODE SECTION 65860

California Government Code Section 65860 requires zoning to be consistent with an agencies' general plan. Consistency with the general plan is possible only if the local government, in this case the City of Placerville, has (i) officially adopted a general plan, and (ii) the land uses authorized in the City's Municipal Code must then be compatible with the objectives, policies, general land uses, and programs specified in the General Plan.

4.8.3.3 Regional Plans, Policies, and Regulations

EL DORADO COUNTY GENERAL PLAN

General Plans are prepared pursuant to state mandates which require every city and county within the state to adopt a comprehensive, long-term general plan for the physical development of the community and lands located inside its boundary, which in the planning agency's judgement, bears a relation to its planning. Additionally, General Plans establish a comprehensive document which can improve coordination of community development activities among all units of government.

Table 4.8-1 lists El Dorado County (County) General Plan goals and policies relevant to the proposed project and provides a discussion of consistency with each goal or policy. The ultimate determination of consistency with local general plan goals and policies lies with the El Dorado County Board of Supervisors.

CITY OF PLACERVILLE GENERAL PLAN

The City's General Plan was adopted on January 23, 1990 and has been amended several times (latest amendment in 2017). The General Plan serves as the overall guiding policy document for land use, development, and environmental quality for the City.

Section I (Land Use Element), Section V (Natural, Cultural, and Scenic Resources), and Section VII (Community Design Element) of the General Plan include policies to preserve the small-town, rural character of the city, while providing for a land use pattern and mix that meets the residential, commercial, and employment needs of the City of Placerville's existing and future residents. Policies that are applicable to the proposed project's environmental effects related to land use are listed in **Table 4.8-1**.

CITY OF PLACERVILLE MAIN STREET STREETSCAPE DESIGN DEVELOPMENT PLAN

The City's (2006) Main Street Streetscape Design Development Plan presents community design ideas for Main Street, as well as provides cost estimates and implementation guidance. As noted in the plan, Main Street is recognized as a recreational shopping and dining destination, and preservation and enhancement of Main Street's unique character is key to downtown Placerville's continued retail success.

The plan identified a design and recommended the adoption of a roundabout for the realignment of Clay Street as set forth in the Placerville Streetscape Concept Design and was originally incorporated into the design for the proposed project (p. II-18 through II-20; III-5). However, due to public opposition, the roundabout was removed as an alternative for the proposed project on July 8, 2014, by City Council resolution and subsequently approved by a majority of the City's voters in Measure K. Although the roundabout is no longer proposed for the project, the realignment of Clay Street to form the fourth leg of Main Street/Cedar Ravine Road intersection would serve the same purpose, and the design concepts shown on page III-5 in the plan and overall design elements for Main Street (e.g., streetscape, street lights, seating, street trees, and accent planting) would still apply to the proposed project. Policies that are applicable to the proposed project's environmental effects related to land use are listed in **Table 4.8-1.**

CITY OF PLACERVILLE DEVELOPMENT GUIDE

The City's Development Guide was adopted on August 25, 1992 and has been updated three times (latest update in 2017). The Development Guide was created to assist applicants, neighbors, staff, and planning commissioners in understanding and applying Placerville's General Plan goals and zoning code requirements; and also, to communicate the City's development design goals through explanations and examples of high-quality alternatives. It is the intent of the guidelines to provide the user with specific design elements that encourage thoughtful development to maintain a sense of community. Policies that are applicable to the proposed project's environmental effects related to land use are listed in **Table 4.8-1.**

This document provides the following:

- Outlines the City's permit application and review procedures;
- Describes the City's development practices, standards, and guidelines; and
- Suggests site and landscape design approaches.

HANGTOWN CREEK MASTER PLAN (DRAFT)

The Hangtown Creek Master Plan is the result of a community effort to improve Hangtown Creek water quality through watershed-based management policies (Hangtown Creek Master Plan Committee 2007). The plan sets forth goals, objectives, policies, and standards addressing enhancement and maintenance of riparian and aquatic habitat; watershed protection, erosion, and flood control; aesthetic history and prehistoric values; and creek access and public spaces, among other topics. The plan remains in draft form and has not been adopted by the City. Policies that are applicable to the proposed project's environmental effects related to land use are listed in **Table 4.8-1.**

4.8.4 Methodology and Thresholds of Significance

Evaluation of the proposed project's potential land use impacts was based on a field review of the project site and surroundings and review of planning documents related to the proposed project area, including the County General Plan, the City General Plan, Main Street Streetscape Design Development Plan, The City Development Guide, and Hangtown Creek Master Plan.

Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects associated with Land Use and Planning. The following threshold questions are used to evaluate the impacts on land use and planning as established in the Initial Study/Notice of Preparation (IS/NOP) for the proposed project (2014):

a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

However, the Notice of Preparation/Initial Study prepared for the proposed project (**Appendix A**) determined that the proposed project would not physically divide an established community. The City does not currently have a habitat conservation plan (HCP) or natural community conservation plan (NCCP) in place, nor does El Dorado County; therefore. the proposed project would not conflict with an applicable habitat conservation plan, and there would be no impact. Therefore, the following thresholds of significance are not discussed further:

b) Physically divide an established community?

c) Conflict with an applicable habitat conservation plan or natural community conservation plan?

The current CEQA Guidelines Appendix G does not include a checklist item for assessing urban decay. However, CEQA Guidelines Section15131(a) provides guidance on consideration of social and economic effects:

> *Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect*

Urban decay is a socioeconomic consideration that is used to study the cause/effect relationship between economic losses and social changes to area from physical changes that occur as a result of a proposed project. Characteristics of physical deterioration contributing to urban decay include abandoned buildings, boarded up doors and windows, parked trucks on vacant sites, long-term unauthorized use of the properties and parking lots, extensive or offensive graffiti painted on buildings,

dumping of refuse or overturned dumpsters on properties, dead trees and shrubbery, and uncontrolled weed growth. Therefore, for the purposes of this project, *urban decay* is defined as significant long-term business vacancies, directly or indirectly related to the physical deterioration of parcels to such an extent that it would impair proper utilization.

Based on this guidance and definition, the following threshold has been applied:

d) Trigger, directly or indirectly, parcel deterioration and consequent long-term vacancies that ultimately result in urban decay?

4.8.5 Project Impacts

Threshold a. Would the proposed project conflict with any land use plan, policy, or regulation?

The El Dorado General Plan, City of Placerville General Plan, City of Placerville Main Street Streetscape Design Development Plan, City of Placerville Development Guide, City of Placerville Municipal Code, City of Placerville Pedestrian Circulation Plan and Hangtown Creek Master Plan (Draft) identify specific goals and policies for the various neighborhoods within the proposed project area. A detailed listing of relevant goals and policies and the proposed project's consistency with those policies is provided in **Table 4.8.1**. The proposed project would not result in any land use designation or zone classification changes. Additionally, applicable community plans within the City reflect this larger goal of improvements to Clay Street and Main Street corridors.

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
El Dorado County General Plan	
Circulation Element. Goal TC-1. To plan for and provide a unified, coordinated, and cost-efficient road and highway system that ensures the safe, orderly, and efficient movement of people and goods. *Policy TC-1n. The County shall generally base expenditure of discretionary road funds for road uses on the following sequence of priorities:* • Maintenance, rehabilitation, reconstruction, and operation of the existing County-maintained road system; • Safety improvements where physical modifications or capital improvements would reduce the number and/or severity of crashes; and • Capital improvements to expand capacity or reduce congestion on roadways at or below County level of service standards, and to expand the roadway network, consistent with other policies of this General Plan *Policy TC-1q. The County shall utilize road construction methods that seek to reduce air, water, and noise pollution associated with road and highway development.*	**Consistent.** The proposed project would improve safety and efficiency across Hangtown Creek by replacing the existing Clay Street Bridge and realigning Clay Street to improve traffic and reduce vehicle collisions at the intersection of Cedar Ravine Road, Main Street, and Clay Street. The proposed project has analyzed the project's impacts on air quality, water quality, and noise effects associated with roadway construction and implementation and has mitigation measures in place to reduce effects on those resources.
Circulation Element. Goal TC-3. To reduce travel demand on the County's road system and maximize the operating efficiency of transportation facilities, thereby reducing the quantity of motor vehicle emissions and the amount of investment required in new or expanded facilities. *Policy TC-3a. The County shall support all standards and regulations adopted by the El Dorado County Air Quality Management District*	**Consistent.** The proposed project was analyzed for regional and state conformity and it was shown that all impacts to air quality are less than significant.

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
governing transportation control measures and applicable state and federal standards.	
Circulation Element. Goal TC-4. To provide a safe, continuous, and easily accessible non-motorized transportation system that facilitates the use of the viable alternative transportation modes. *Policy TC-4a. The County shall implement a system of recreational, commuter, and inter-community bicycle routes in accordance with the County's Bicycle Transportation Plan. The plan should designate bikeways connecting residential areas to retail, entertainment, and employment centers and near major traffic generators such as recreational areas, parks of regional significance, schools, and other major public facilities, and along recreational routes.*	**Consistent.** The proposed project is consistent with Goal TC-4a. The proposed project includes the addition of sidewalks and Class III bicycle facilities on both sides of Clay Street with connections to the El Dorado Trail, residential areas to the north, and to the Locust Street parking lot.
Circulation Element. Goal TC-5. To provide safe, continuous, and accessible sidewalks and pedestrian facilities as a viable alternative transportation mode.	**Consistent.** The proposed project is consistent with Goal TC-5 as it includes the addition of sidewalks on both sides Clay Street and provides for better pedestrian access across Hangtown Creek to Main Street. The improved intersection will include crosswalks with ADA compliant curb ramps improving pedestrian access
City of Placerville General Plan	
Section I. Policy C.2: The City shall assist the private sector in maintaining and improving the economic viability of downtown through the provision of public facilities and services and the enactment of land use policies and decisions supportive of downtown's primary commercial role.	**Consistent.** Although the Clay Street Bridge would be replaced and the Main Street/Clay Street/Cedar Ravine intersection would be realigned, the proposed project would not alter the existing land uses on the project site. It would provide safe access for all modes of transportation and continue to provide parking facilities.
Section I. Policy C.9: The City's planning for commercial areas shall be guided by the following principles: a) Contribute to the City's	**Consistent.** The proposed project would include design features to create a pedestrian safe environment in keeping with the plan. Community

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
objective to become a balanced community; b) have a positive economic impact on the community; c) provide for adequate parking and vehicular access; and d) be designed and landscaped in a manner sensitive to Placerville's character.	resources such as the Druid Monument and cork oak tree would be incorporated into project design.
Section III. Policy A.1: The City shall strive to attain the highest possible traffic levels of service consistent with the financial resources available and within the limits of technical feasibility.	**Consistent.** The proposed project would remove the existing Clay Street bridge and realign and add the Clay Street leg to the existing Main Street/Cedar Ravine Road intersection. The Bedford Avenue intersections are predicted to be primarily unaffected by the proposed project and the delay changes are negligible. With Clay Street realigned into the Main Street/Cedar Ravine Road intersection, the overall intersection delay would increase, but the resulting level of service (LOS) B conditions would be acceptable.
Section III. Policy A.2: Streets shall be dedicated, widened, extended, and constructed according to the City's Master Street Plan and the street cross-sections shown in the Street Standards figures in Part I [of the Master Street Plan]. Rights-of-way shall be reserved according to the specifications of the Master Street Plan. Deviations from the street cross-sections shown in Part 1 shall be allowed based upon a determination by the Public Works Director that safe and adequate public access and circulation are preserved by such deviations.	**Consistent.** The Clay Street Bridge Replacement and Realignment project has been considered by the City for over 50 years and first emerged into planning documents dating back to 1974 in the Master Street Plan and Improvement Program (adopted by City Council in January of 1975), identified in that document as "Project No. 9 – Clay Street", where Clay Street is identified as a collector and with an acknowledged need to provide better north to south connecting roads to the north residential area through realigning Clay Street closing the existing connection at Main Street, reorganizing the parking facility, widening Clay Street to 40 feet and construct a new bridge over the creek and widen Clay Street to collector street standards and extend to Pleasant Street. The proposed project involves replacing a substandard bridge and improvements to an existing roadway facility. All components

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
	of the proposed project would be constructed in accordance with the requirements of the City's Master Street Plan.
Section III. Policy A.9: The City shall aggressively pursue state and federal funding to implement the City's Circulation Plan.	**Consistent.** Funding for the proposed project has been programmed from multiple federal, state, and local sources including the Highway Bridge Program (HBP), Regional Surface Transportation Program (RSTP) Exchange, and local developer Traffic Impact Mitigation (TIM) fees.
Section III. Policy C.2: In the development of new projects, the City shall give special attention to maintaining adequate corner-sight distances at city street intersections and at intersections of city streets and private access drives and roadways.	**Consistent.** The proposed project has been designed to meet the City's street and parking standards. Additionally, the proposed project would provide a safe roadway and bridge facilities for both vehicles and pedestrians.
Section III. Policy F.1: Pedestrian circulation needs and convenience in the downtown shall be given priority over the needs of through traffic.	**Consistent.** The proposed project is consistent as it would provide a two-lane street with sidewalks on both sides of the road, which would allow for safer pedestrian and bicycle connections to the El Dorado Trail, the downtown core, residential area to the north, and ultimately to the Locust Avenue parking lot.
Section V. Policy A.5: The City shall require in new development sound anti-pollution practices to protect water quality.	**Consistent.** The replacement and realignment of the Clay Street Bridge and reconfiguration of the Ivy House parking lot would not be a new source of runoff because the proposed project is replacing existing facilities that already generate runoff conveyed into the storm drain and Hangtown Creek. The proposed project would require a Stormwater Pollution Prevention Plan (SWPPP) ensuring compliance with state laws and regulations.
Section V. Policy B.7: The City shall, to the maximum extent possible prevent the dumping of wastes and other substances, such as	**Consistent.** Construction activities would incorporate Best Management Practices (BMPs) and mitigation measures that would minimize hazards

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
pesticides, soil sterilants and toxic wastes harmful to soil structures, soil organisms, or fertility.	emissions or potential hazard released from routine transport, use, or disposal of hazardous materials.
Section V. Policy D.1: The City shall make every effort to protect riparian vegetation. To this end, buildings and improvements shall be set back from watercourses.	**Consistent.** The proposed project includes mitigation measures to reduce project effects on riparian and montane hardwood-conifer vegetation, oaks, and other native trees. Additionally, the proposed project includes mitigation measures to reduce project effects on waters of the U.S.
Section V. Policy D.2: The City shall ensure that channel improvements to and tree and brush clearance activities along creeks within the city do not unnecessarily disturb riparian vegetation.	**Consistent.** The proposed project includes mitigation measures to reduce effects on riparian and montane hardwood-conifer vegetation, oaks, and other native trees.
Section V. Policy D.3: New development shall be sited to protect native tree species, riparian vegetation, important concentrations of natural plants, and important wildlife habitat, to minimize visual impacts and to provide for continuity of wildlife corridors.	**Consistent.** The proposed project would not reduce wildlife movement potential because no permanent improvements are proposed within Hangtown Creek that would create physical barriers to dispersal. Mitigation Measures would further protect native tree species, riparian vegetation, important concentrations of natural plants, and important wildlife habitat, to minimize visual impacts.
Section V. Policy D.6: To retain the natural landscape character of Placerville, introduced plants in public and private landscaping should be subordinate to and compatible with existing natural landscape.	**Consistent.** Landscaping designs for the proposed project would not contain invasive species in the plant selections or seed mixtures. Effects of disturbance to Hangtown Creek and Cedar Ravine and the adjacent riparian corridor shall be minimized by revegetating areas of temporary disturbance within the project footprint with native vegetation.
Section V. Policy D.7: The City shall encourage creative site planning which will minimize the destruction of trees.	**Consistent.** The proposed project includes mitigation measures to protect natural features, including the cork oak tree and redwood tree at the

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
	northwest corner of the Clay Street Bridge, and to reduce impacts associated with the loss of vegetation and trees.
Section V. Policy D.8: The City shall condition development approval to minimum grading, disturbance of root systems, and compaction of soil under the drip line of trees during construction.	**Consistent.** The proposed project would involve construction around trees that would be retained. The proposed project includes mitigation measures to require implementation of a certified arborist to protect the root systems.
Section V. Policy D.11: The City shall take action to ensure the protection of Hangtown Creek and the creek area.	**Consistent.** The proposed project is consistent as it enhances or preserves the visual amenities of Hangtown Creek and the Druid Monument and allows greater access to views of these amenities.
Section V. Policy G.1: The City shall set as a high priority the protection and enhancement of Placerville's historically and architecturally significant buildings and sites.	**Partially Consistent.** The Clay Street Bridge would be replaced and the intersection would be realigned. The Clay Street Bridge would be removed as part of the proposed project, which is significant and unavoidable loss of an architecturally significant resource. Although the Druid Monument would be moved, it would still be retained in its general current location within the City of Placerville. Mitigation measure were developed for the proposed project to protect the Druid Monument and Ivy House archaeological deposits during construction. Mitigation measures were also developed to protect adjacent historic buildings from construction-generated vibration.
Section V. Policy G.2: The City shall encourage all public and private efforts to preserve and promote Placerville's historical heritage for economic benefits associated with increasing tourist trade.	**Consistent.** Tribal and interested parties' consultation efforts initially began in 2008 and would continue over the life of the proposed project. The City has engaged public and private stakeholder regarding historic elements within the proposed project through in-person meetings and written correspondence.

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
Section V. Policy G.7: The City shall promote awareness of the significance of Placerville's historical features through such means as walking tours, a docent program, appropriate monuments, plaques and markers, and pamphlets and interpretive displays.	**Consistent**. As part of the movement of the Druid Monument, it would be moved to a location that allows for easier public access. Mitigation measures require the City to install a freestanding interpretive/educational sign shall be erected next to the monument to highlight the monument's original location, why it was moved, its importance to the Druid organization, and its National Register of Historic Places (NRHP) status.
Section V. Policy H.1: The City shall not knowingly approve any public or private project that may adversely affect an architectural site without consulting the California Archeological Inventory at California State University, Sacramento, conducting a site evaluation as may indicated, and attempting to mitigate any adverse impacts according to the recommendations of a qualified archeologist. City implementation of this policy shall be guided by Appendix K of the State CEQA Guidelines.	**Consistent**. Although the Druid Monument would be moved, it would still be retained in its general current location within the City. Mitigation measure were developed for the proposed project to protect the Druid Monument and Ivy House archaeological deposits during construction. The Clay Street Bridge would be removed as part of the proposed project, and the City acknowledges the significant and unavoidable adverse impact on the cultural resources after mitigation. The City is actively consulting with the California Office of Historic Preservation (OHP) regarding project effects on historic resources.
Section V. Policy I.1: Those positive aspects and attributes of the city which are controllable, and which contribute to the quality of life of the city and its environment, shall be preserved and perpetuated. Placerville's positive aspects and attributes are its rural country atmosphere, historical heritage, small town atmosphere, compatible neighborhoods and development, and lack of congestion.	**Consistent.** Replacement of the bridge and division of the Ivy House parking lot into two lots separated by the realigned Clay Street would not change the function of the proposed project site compared to existing uses. The scale of the existing parking lot would be reduced compared to existing conditions. The small-town atmosphere would be retained with implementation of mitigation measures, which would ensure the proposed project includes landscaping and pedestrian-scale amenities consistent with the City's historical heritage.

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
Section V. Policy I.4: The City shall condition development approvals to protect natural features such as rock outcrops and trees.	**Consistent.** The cork oak tree, which is a prominent feature at the Ivy House parking lot, would remain in place. The mature redwood at the northwest side of the El Dorado Trail at Clay Street would need to be evaluated to determine its health. If the redwood tree can be retained, it would be protected during construction. Mitigation measures address tree protection for the cork oak and redwood tree. The proposed project would result in the removal of approximately 20 trees on the northeast side of the Clay Street Bridge by the El Dorado Trail, which would be mitigated. Mitigation measures also include requirements for tree protection where trees are within the construction area but would not need to be removed. The trees adjacent to US 50 would not be removed.
Section V. Policy I.5: The City shall preserve creeks in as natural a state as possible.	**Consistent.** The proposed project would minimize effects of disturbance to Hangtown Creek and Cedar Ravine and the adjacent riparian corridor. Areas of temporary disturbance would be revegetated with native riparian vegetation. The completed project would enhance existing riparian habitat and maintain adamant shading over Hangtown Creek and increase nesting opportunities.
Section V. Policy I.7: The City shall protect the visual character of scenic street and highway corridors.	**Consistent.** The proposed project is consistent with this policy. The proposed project does not include any changes to or on the U.S. Highway 50 (US 50) overcrossing. Much of the proposed project area is screened by existing trees within the Caltrans right-of-way that would not be removed as part of the proposed project. The assumed eligible Placerville Main Street Historic District, including the Druid Monument and the historic buildings located west of the Clay Street/Main Street/Cedar Ravine Road Intersection are located outside of the state scenic highway, and the presence of trees obstructs direct views. Any trees removed

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
	within the active construction area would be replaced at a minimum 1:1 ratio or higher as determined by the permits required by the natural resource agencies.
Section VI. Policy F.1: City approvals of all new development shall consider the potential for the production, use, storage, and transport of hazardous materials and provide for reasonable controls on such hazardous materials.	**Consistent.** Construction activities would incorporate BMPs and mitigation measures that would minimize hazards emissions or potential hazard released from routine transport, use, or disposal of hazardous materials.
Section VI. Policy F.2: Within its authority, the City shall regulate the production, use, storage, and transport of hazardous materials to protect the health of Placerville residents.	**Consistent**. The proposed project consists of a bridge replacement and roadways improvements that would not include the use, storage and/or transport of hazardous materials beyond these used during normal construction activities. Hazardous materials use during project operation would be limited to common items such as landscape and maintenance products.
Section VI. Policy I.1: The City shall attempt, insofar as possible to, to protect areas within the city where the present noise environment is considered acceptable.	**Consistent.** The proposed project would not result in a permanent increase in noise levels beyond those of the existing environment. In addition, mitigation measures would reduce noise levels in excess of standards established in the local general plan or noise ordinance during construction to a less than significant impact.
Section VII. Policy A.1: The City shall protect and manage Placerville's tree cover for ecological, aesthetic, and economic reasons.	**Consistent.** The cork oak tree, which is a prominent feature at the Ivy House parking lot, would remain in place. The mature redwood at the northwest side of the El Dorado Trail at Clay Street would need to be evaluated to determine its health. If the tree can be retained, it would be protected during construction. Mitigation measures were developed to address tree protection for the cork oak and redwood tree. The proposed

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
	project would result in the removal of approximately 20 trees on the northeast side of the bridge by the El Dorado Trail, but trees would be replaced as described in mitigation measures. This mitigation measure also includes requirements for tree protection where trees are within the construction area but would not need to be removed. The trees adjacent to US 50 would not be removed.
Section VII. Policy A.4: The City shall make every effort to protect riparian vegetation. To this end, buildings and improvements will be set back from watercourses.	**Consistent.** The project would replace the existing bridge and culvert and would not add new features that require setbacks from Hangtown Creek or Cedar Ravine. The proposed project would minimize effects of disturbance to Hangtown Creek and Cedar Ravine and the adjacent riparian corridor. Areas of temporary disturbance would be revegetated with native riparian vegetation. The completed project would enhance existing riparian habitat.
Section VII. Policy A.5: To retain the natural landscape of Placerville, introduced plants in public and private landscaping should be subordinate to and compatible with existing natural vegetation. The use of native and drought-resistant plants will be encouraged.	**Consistent.** The proposed project is consistent with mitigation incorporated. Construction of the proposed project would result in a net positive impact due to invasive species removal. During construction, it is likely that invasive species would be removed and replaced by native plants. Construction of the proposed project is not expected to result in the introduction, establishment, or spread of new invasive species into the County. Landscaping designs for the proposed project would not contain invasive species in the plant selections or seed mixtures.
Section VII. Policy A.6: The City shall maintain and/or enhance the visual character of scenic street and highway corridors.	**Consistent.** The proposed project is consistent with this policy. The proposed project does not include any changes to or on the US 50 overcrossing. Much of the proposed project area is screened by existing trees within the Caltrans right-of-way that would not be removed as part of

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
	the proposed project. The proposed project would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within the state scenic highway. The assumed eligible Placerville Main Street Historic District, including the Druid Monument and the historic buildings located west of the Main Street/Clay Street/Cedar Ravine Road intersection are located outside of the state scenic highway, and the presence of trees obstructs direct views. Any trees removed within the active construction area would be replaced at a rate and size determined by the permits required by the natural resource agencies.
Section VII. Policy B.5: The City shall promote design concepts which will contribute to better pedestrian convenience and safety.	**Consistent.** The proposed project design includes pedestrian crosswalks at the realigned intersection and new pedestrian facilities along the replacement Clay Street Bridge, and would fill a gap in the sidewalk along Cedar Ravine Road, which would improve pedestrian safety and a more convenient access.
Section VII. Policy D.1: Future road development shall be planned to conform to the topography and to take advantage of views and vistas. The City shall ensure that new street projects are designed to minimize impact on terrain and natural vegetation.	**Consistent.** The project would realign Clay Street within the existing footprint of the Ivy House parking lot, which is flat. The proposed project would have no impact on terrain. Although the proposed project would result in some vegetation removal, the loss would be mitigated and landscaping would be added.
Section VII. Policy D.2: The City shall attempt to preserve existing trees within street rights-of-way and encourage preservation of all mature trees on private property where visible from the street and where feasible.	**Consistent.** The cork oak tree, which is a prominent feature at the Ivy House parking lot, would remain in place. The mature redwood at the northwest side of the El Dorado Trail at Clay Street would need to be evaluated to determine its health. If the redwood tree can be retained, it would be protected during construction. Mitigation measures address tree protection for the cork oak and redwood tree. The proposed project would

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
	result in the removal of approximately 20 trees on the northeast side of the bridge by the El Dorado Trail, which would be mitigated. Mitigation measures also include requirements for tree protection where trees are within the construction area but would not need to be removed. The trees adjacent to US 50 would not be removed.
Section VII. Policy D.3: The City shall promote the installation and maintenance of landscaping in public and private areas appropriate to street type, surrounding architecture, general character of the district, and street beautification programs.	**Consistent.** Although the Clay Street Bridge would be replaced and the intersection would be realigned, the proposed project would not alter the existing land uses on the project site. It would provide safe access for all modes of transportation and continue to provide parking facilities. The proposed project would include streetscape and landscape design to ensure consistency with the concept design for Main Street and Clay Street in the Main Street Streetscape Design Development Plan.
Section VII. Policy D.4: The City shall use the city street system as the unifying framework of the community through the use of distinctive street design and landscape treatment.	**Consistent.** The proposed project would include streetscape and landscape design to ensure consistency with the concept design for Main Street and Clay Street in the Main Street Streetscape Design Development Plan.
Section VII. Policy D.5: The City shall require landscaping in any street design that adversely impacts the visual character of a neighborhood.	**Consistent**. Although the Clay Street Bridge would be replaced and the intersection would be realigned, the proposed project would not alter the existing land uses on the project site. It would provide safe access for all modes of transportation and continue to provide parking facilities. The project would include design features to create a pedestrian safe environment in keeping with the plan. Historic resources such as the Druid Monument and the assumed eligible Placerville Main Street District would be retained and protected.

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
Section VII. Policy I.1: The City shall ensure that new development will be a positive addition to the city's environment and not detract from the nature and character of appropriate nearby established development because of architectural style, scale, or location.	**Consistent.** The proposed project would not add new uses or development, change the overall function of the proposed project site compared to existing conditions, or have features that would be out of scale relative to nearby development. The proposed project would require features to be included in project design to ensure the reconfigured parking lot and intersection contain landscape features consistent with the Main Street Streetscape Design Development Plan. Nor would the realignment of Clay Street through the Ivy House parking lot to create a four-way intersection with Main Street and Cedar Ravine Road adversely affect character-defining elements associated with the assumed eligible Placerville Main Street District. The setting of this intersection has already been substantially altered since its original construction, with the removal of the Ivy House and Federated Church in the early 1960s that once flanked Main Street on the east side of Cedar Ravine Road and subsequent reconfiguring of the intersection.
City of Placerville Main Street Streetscape Design Development Plan	
Section II. Streetscape Elements. Roundabout.	**Consistent.** The proposed project is consistent with the Main Street Streetscape Design Development Plan as it realigns Clay Street and proposed to improve traffic circulation by creating a four-way intersection at Clay Street, Cedar Ravine Road, and Main Street without the implementation of a roundabout. The proposed project would be consistent with the Plan as it would reconfigure the Ivy House parking lot, include pedestrian paving, and relocate the Druid Monument. After the completion and adoption of the Main Street Streetscape Design Development Plan by City Council, Measure K was approved by the voters on November 4, 2014. The City is prohibited from constructing or

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
	utilizing roundabouts, traffic circles, and/or any similar features unless the specific project is approved by popular vote.
Section I. Goals. • Preserve and enhance the historical character and assets of Downtown; • Improve the pedestrian shopping experience and thus bolster Downtown's retail economic viability; and • Develop a plan that is aesthetically cohesive and economically viable, a plan that can be implemented through a multi-phase and multi-year effort.	**Consistent.** The bridge replacement and associated Clay Street realignment, which would result in the reconfiguration of the Ivy House parking lot, is part of the Main Street Streetscape Design Development Plan adopted by the City Council in 2006. The new Clay Street Bridge would preserve historical character and aesthetics in design and provide new and improved pedestrian access to the downtown/Main Street shopping corridor in the City. The proposed project is consistent with the Main Street Streetscape Design Plan and would not impede the plan's implementation over a multi-phase, multi-year effort.
City of Placerville Development Guide	
Chapter VI. Landscape Design Guidelines. *Community Intersection (Surface Streets). Driveways and street intersections require special plantings and accent treatments and should clearly identify these nodes for pedestrians as well as motorists. Focal elements that terminate views such as water features, public art, or other monumentation are encouraged in these areas, located as not to impede circulation and as not to pose risks for public health and safety. Features in the streetscape such as the Bell Tower, the Druid Monument, veterans' memorials, and other visual amenities define spaces and create distinctive landmarks. Signage used in these focal areas must exemplify high standards of quality and durability in materials and design.*	**Consistent.** The proposed project is consistent as it enhances or preserves the visual amenities of Hangtown Creek and the Druid Monument at the proposed project site and allows greater access to views of these amenities.

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
Chapter XI. Lighting. *Streetscape Lighting. 1) Streetlights and other features within public rights-of-way will reflect a simple design theme of the type and quality illustrated in this section. 2) Streetlights should be consistent throughout the City on similar street types. 3) Light standards and fixtures will be painted 'forest' green in the streetscapes and public spaces throughout Placerville. 4) Lighting of signs should be subdued and indirect, illuminating the area of the sign only. All signs, entry monumentation, public art, directories, kiosks, or other streetscape elements should be illuminated by concealed fixtures.*	**Consistent.** Lighting modifications, if any, would not represent a substantial change from existing conditions. Any new fixtures installed would be required to comply with the City's lighting specifications for public roadways.
City of Placerville Municipal Code	
Section 10-4-10 (Historical Buildings in the City). Also referred to as the "Historical Ordinance," establishes the requirements for building removal and repairs and activities that could affect exterior architecture.	**Consistent.** The Druid Monument is specifically identified as a historic monument under Section 8-16-1 (Monuments) of the Municipal Code. Although the Druid Monument would be moved, it would still be retained in its general current location within the City. Mitigation measures were developed for the proposed project to protect the Druid Monument during construction.
City of Placerville Pedestrian Circulation Plan	
Chapter 4 Implementation & Funding *Section 4.1 Funding Background* *The City of Placerville currently employs the following mechanisms to fund sidewalk improvements: 1) Property-owner maintenance of existing sidewalks – Per current City Code, maintenance of existing sidewalks is the responsibility of the adjacent property owners. 2) Deferred Frontage Improvement Agreements – Improvement or construction of sidewalks is "deferred" until adjacent properties enter into agreements or construct sidewalks. 3) Conditions on*	**Consistent.** Funding for the proposed project has been programmed from multiple federal, state, and local sources including HBP, RSTP Exchange, and local developer TIM fees

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
development projects – New development is required to install sidewalks within the development area as a condition of project approval. However, in the past this condition has been waived on many development projects.	
Hangtown Creek Master Plan (Draft)	
Goal 2. Policy 1. No new structures improvements, or grading activities shall be allowed that do not enhance riparian habitat.	**Consistent.** The proposed project would minimize disturbance to Hangtown Creek and Cedar Ravine and the adjacent riparian corridor by implementing BMPs and mitigation measures. Areas of temporary disturbance would be revegetated with native riparian vegetation. The completed project would enhance existing riparian habitat.
Goal 2. Policy 2. Encourage increased shading throughout the creek area to maintain water temperatures in Hangtown Creek that support the native cold-water fishery.	**Consistent.** The proposed project would minimize disturbance to Hangtown Creek and Cedar Ravine and the adjacent riparian corridor by implementing BMPs and mitigation measures. Areas of temporary disturbance would be revegetated with native riparian vegetation. The completed project would enhance existing riparian habitat and maintain adamant shading over Hangtown Creek and increase nesting opportunities.
Goal 2. Policy 3. The City is encouraged to seek funding for the installation of filtration systems to treat stormwater run-off originating from existing parking lots.	**Consistent.** Funding for the proposed project has been programmed from multiple federal, state, and local sources including the HBP, RSTP Exchange, and local developer TIM fees
Goal 2. Policy 5. Reduce stormwater-related flooding and damage to stream and wetland habitat, and increase infiltration.	**Consistent.** The replacement and realignment of the Clay Street Bridge and reconfiguration of the Ivy House parking lot would not be a new source of runoff because the proposed project is replacing existing facilities that already generate runoff conveyed into the storm drain and

TABLE 4.8.1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES	
POLICY	**PROPOSED PROJECT**
	Hangtown Creek. The proposed project would require a SWPPP ensuring compliance with state laws and regulations.
Goal 2. Policy 6. The City shall ensure that channel improvements to creeks and tree and brush clearance activities along creeks within the city do not unnecessarily disturb riparian vegetation.	**Consistent.** The proposed project is consistent with these policies. The proposed project would minimize disturbance to Hangtown Creek and Cedar Ravine and the adjacent riparian corridor by implementing BMPs and mitigation measures. Areas of temporary disturbance would be revegetated with native riparian vegetation. The completed project would enhance existing riparian habitat and maintain sufficient shading over Hangtown Creek and increase nesting opportunities.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the proposed project would not conflict with any land use plan, policy, or regulation. Therefore, no mitigation measures are required or included, and the impact level would be **less than significant**.

Theshold d. Directly or indirectly, would the proposed project trigger parcel deterioration and consequent long-term vacancies that ultimately result in urban decay?

The proposed project would replace the existing Clay Street Bridge, requiring the widening of the bridge over Hangtown Creek, realignment of Clay Street, and the formation of new four-way intersection with Clay Street, Main Street, and Cedar Ravine Road. The proposed project would address the functional and structural deficiencies of the existing structure, as well as improve roadway safety and traffic operations, provide new pedestrian and bicycle accommodations to improve safety, while minimizing impacts to the adjacent properties. For businesses immediately adjacent to the proposed project site, access to the businesses would be maintained at all times during the approximately 9- to 12-month construction period.

The bridge replacement and realignment of Clay Street to form the new intersection would occur entirely on public property owned by the City. No private property acquisition would result from the proposed project.

Community members and business owners have speculated that the reconfiguration of the Ivy House parking lot, which would result in the loss of approximately 14 parking spaces, would have negative economic effects because people would have to seek parking elsewhere, which they believe could discourage people from visiting downtown. However, in 2014, the City acquired a parking lot on Locust Avenue adjacent to the El Dorado Trail, approximately 400 feet northeast of the Ivy House parking lot. The lot on Locust Avenue will provide approximately 25 additional spaces for public parking that are intended to offset the loss of spaces at the Ivy House parking lot. The result of the modifications to the Ivy House parking lot and the availability of the Locust Avenue parking lot would result in a net gain of approximately 11 public parking spaces. Additionally, the proposed project would improve traffic operations on southbound Clay Street and eastbound Main Street and would provide a two-lane street with sidewalks on both sides of the road, which would allow for safer pedestrian and bicycle connections to the El Dorado Trail, the downtown core, the residential areas to the north and ultimately to the Locust Avenue parking lot.

The proposed project would provide continued access and contribute to the economic vibrancy of downtown Placerville. None of the proposed project components would require property acquisition, create disruptions to the surrounding neighborhoods, change existing community relationships, or interfere with the operation of the existing public or private facilities. Thus, the proposed project would not trigger parcel deterioration or long-term vacancies that could ultimately result in urban decay.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the proposed project would not result in parcel deterioration or long-term vacancies that could result in urban decay. Therefore, no mitigation measures are required or included, and the impact level would be **less than significant**.

4.8.6 Cumulative Impacts

Cumulative impacts are two or more individual impacts that, when considered together, are considerable or that compound or increase other environmental impacts. The geographic scope for cumulative impacts to land use includes past, present, and reasonably foreseeable projects located within the City General Plan area, as defined in **Section 3.6, Cumulative Projects, Table 3.6-1**.

With respect to conflicts with any land use plan, policies, or regulations, including HCPs and NCCPs, the proposed project is in compliance with all pertinent planning documents as described in this REIR. As indicated in the discussion above, and shown in **Table 4.8-1**, the proposed project is anticipated to result in less-than-significant impacts on land use at the project level. In addition, proposed project design and mitigation measures included in **Section 4.1** through **4.10** of this REIR, would further ensure compliance with applicable planning documents and requirements set forth by the City.

Land use impacts are generally localized, and individual impacts of any future projects would be addressed on a project-by-project basis. The proposed project's surrounding area is built out, with downtown Placerville. The proposed project would replace an existing bridge, realign an existing roadway, create a new four-way intersection to replace the two existing three-way intersections, and reconfigure the existing Ivy House parking lot. This would not contribute to a substantial cumulative impact on proposed land uses in and around the proposed project site, nor would it physically divide an established community. Therefore, the proposed project would not contribute to an overall significant cumulative land use impact in the area. Thus, potential cumulative effects would be less than cumulatively considerable. Similarly, planned or future projects in the area would also be subject to applicable federal, State, and local regulations to ensure that land use conflicts do not occur. Any such, impacts would be

reduced through each project's implementation of mitigation measures, as appropriate, and subject to City review and approval.

The proposed project would not trigger parcel deterioration or long-term vacancies that could ultimately result in urban decay. As shown in **Table 3.6-1**, the majority of the cumulative projects in the City are housing projects, including projects that would provide single-family and multi-family affordable homes, as well as projects that would implement the City's General Plan Housing Element. Of the cumulative project list, there are four projects that do not involve housing, of which only one would involve retail: the addition of retail to the existing Hangtown Range. The proposed project would not combine with past, present, or reasonably foreseeable future projects that would result in parcel deterioration or long-term vacancies. Thus, potential cumulative effects resulting in urban decay would be less than cumulatively considerable.

4.9 Noise and Vibration

4.9.1 Introduction

This section of the Environmental Impact Report (REIR) addresses the potential noise impacts associated with construction and operation of the Clay Street Bridge Replacement Project (proposed project). It describes the existing noise conditions on the project site, the regulatory setting, the impacts of the proposed project, and feasible mitigation measures to reduce impacts.

Under 23 CFR 772.5, projects are categorized as Type I, Type II, or Type III projects. The Federal Highway Administration (FHWA) defines a Type I project as a proposed federal or federal-aid highway project for the construction of a highway in a new location, or the physical alteration of an existing highway which significantly changes either the horizontal or vertical alignment or increases the number of through-traffic lanes. The City of Placerville (City) has determined that the proposed project is not a Type I project, as defined by 23 CFR 772.5. Because this is not a Type I project, the following discussion is limited to the existing noise environment and to construction generated noise.

The information in this section is based on a Ground Vibration Monitoring analysis prepared for the proposed project (Gasch Geophysical Services, Inc 2018).

4.9.1.1 Terminology

NOISE

Noise is typically defined as airborne sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. Sound is mechanical energy of a vibrating object transmitted by pressure waves through a medium to human (or animal) ears. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard and are called sound. Perceptions of sound and noise are highly subjective from person to person, and are dependent upon sound source, sound path, and sound receiver. A typical noise environment consists of a base of steady “background” noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These sources can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

A logarithmic scale is used to describe sound pressure level, in terms of decibels (dB). The decibel scale alone does not adequately characterize how humans perceive noise. An “A-weighted” sound level (expressed in units of dBA) can be computed by weighting sound levels of individual frequency bands by the sensitivity of an average young ear to those frequencies. **Figure 4.9-1** describes typical A-weighted noise levels for different activities. It is widely accepted that people are able to detect

changes in sound level of 3 dB or greater in typical noise environments. A 5-dB change is generally perceived as distinctly noticeable.

The maximum sound level for a given noise source is abbreviated “Lmax”. The average sound level over a period of time (usually one hour) is called the equivalent continuous sound level and is abbreviated “Leq”. To characterize sound levels occurring over a 24-hour period, penalties are often applied to nighttime sound levels. When a 5-dB penalty is applied to levels occurring between 7 PM to 10 PM and a 10-dB penalty is applied to levels occurring between 10 PM and 7 AM, the energy average of the A-weighted sound levels (dBA) is called the Community Noise Exposure Level (CNEL).

VIBRATION

Vibration is defined as the mechanical motion of earth or ground, building, or other type of structure, induced by the operation of any mechanical device or equipment located upon or affixed thereto. Vibration generally results in an oscillatory motion in terms of the displacement, velocity, or acceleration of the ground- or structure(s) that causes a normal person to be aware of the vibration by means such as, but not limited to, sensation by touch or visual observation of moving objects.

The effects of ground-borne vibration include movements of building floors, rattling of windows, and shaking of items on shelves or hangings on the walls. In extreme cases, vibration can cause damage to buildings. The noise radiated from the motion of the room surfaces is called ground-borne noise. The vibration motion normally does not provoke the same adverse human reactions as the noise unless there is an effect associated with the shaking of the building. In addition, the vibration noise can only occur inside buildings. Similar to the propagation of noise, vibration propagated from the source to the receptor depends on the receiving building (i.e., the weight of the building), soil conditions, layering of the soils, the depth of groundwater table, etc.

4.9.2 Environmental Setting

The proposed project site consists of the Clay Street Bridge, Clay Street, the Main Street/Clay Street intersection, the Main Street/Cedar Ravine Road intersection, the El Dorado Trail, and the Ivy House parking lot. Land uses surrounding the proposed project site consist of commercial and retail uses on the west, south, and east. Hangtown Creek, the El Dorado Trail, and U.S. Highway 50 (US 50) comprise the land uses to the north of the proposed project. Ambient noise levels at the proposed project site are primarily influenced by vehicle traffic on area roadways. No major non-transportation noise sources are in the immediate vicinity of the proposed project. The traffic-generated noise levels from the roadways average between 50 dBA to 60 dba (**Figure 4.9-1**)

Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Land uses such as parks, historic sites, cemeteries, and recreation areas are also considered sensitive to increases in noise levels. Schools, churches, hotels, libraries,

and other places where low interior noise levels are essential are considered noise-sensitive land uses. The closest noise-sensitive land uses to the proposed project site are residences adjacent to the proposed project site along Cedar Ravine Road.

4.9.3 Regulatory Setting

4.9.3.1 Federal

NATIONAL ENVIRONMENTAL POLICY ACT AND 23 CFR 772

The National Environmental Policy Act (NEPA) of 1969 provides the broad basis for analyzing and abating highway traffic noise effects. The intent of this law is to promote the general welfare and to foster a healthy environment. The requirements for noise analysis and consideration of noise abatement under NEPA are described below.

For highway transportation projects with Federal Highway Administration (FHWA) involvement (and the Department, as assigned), the Federal-Aid Highway Act of 1970 and its implementing regulations (23 CFR 772) govern the analysis and abatement of traffic noise impacts. The regulations require that potential noise impacts in areas of frequent human use be identified during the planning and design of a highway project. The regulations include noise abatement criteria (NAC) that are used to determine when a noise impact would occur. The NAC differ depending on the type of land use under analysis. For example, the NAC for residences (67 dBA) is lower than the NAC for commercial areas (72 dBA). The following table, **Table 4.9-1**, lists the noise abatement criteria for use in the NEPA and 23 CFR 772 analysis.

TABLE 4.9.1 NOISE ABATEMENT CRITERIA

ACTIVITY CATEGORY	NAC, HOURLY A- WEIGHTED NOISE LEVEL, LEQ(H)	DESCRIPTION OF ACTIVITY CATEGORY
A	57 (Exterior)	Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.
B	67 (Exterior)	Residential.
C	67 (Exterior)	Active sport areas, amphitheaters, auditoriums, campgrounds, cemeteries, day care centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, Section 4(f) sites,

TABLE 4.9.1 NOISE ABATEMENT CRITERIA		
ACTIVITY CATEGORY	NAC, HOURLY A- WEIGHTED NOISE LEVEL, LEQ(H)	DESCRIPTION OF ACTIVITY CATEGORY
		schools, television studios, trails, and trail crossings.
D	52 (Interior)	Auditoriums, day care centers, hospitals, libraries, medical facilities, places of worship, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, schools, and television studios.
E	72 (Exterior)	Hotels, motels, offices, restaurants/bars, and other developed lands, properties, or activities not included in A–D or F.
F	No NAC—reporting only	Agriculture, airports, bus yards, emergency services, industrial, logging, maintenance facilities, manufacturing, mining, rail yards, retail facilities, shipyards, utilities (water resources, water treatment, electrical, etc.), and warehousing.
G	No NAC—reporting only	Undeveloped lands that are not permitted.

[1] Includes undeveloped lands permitted for this activity category.
NAC = Noise Abatement Criteria, Leq(h) = equivalent noise level measured for a 1-hour period.

Figure 4.9-1 lists the noise levels of common activities to enable readers to compare the actual and predicted highway noise levels discussed in this section with common activities.

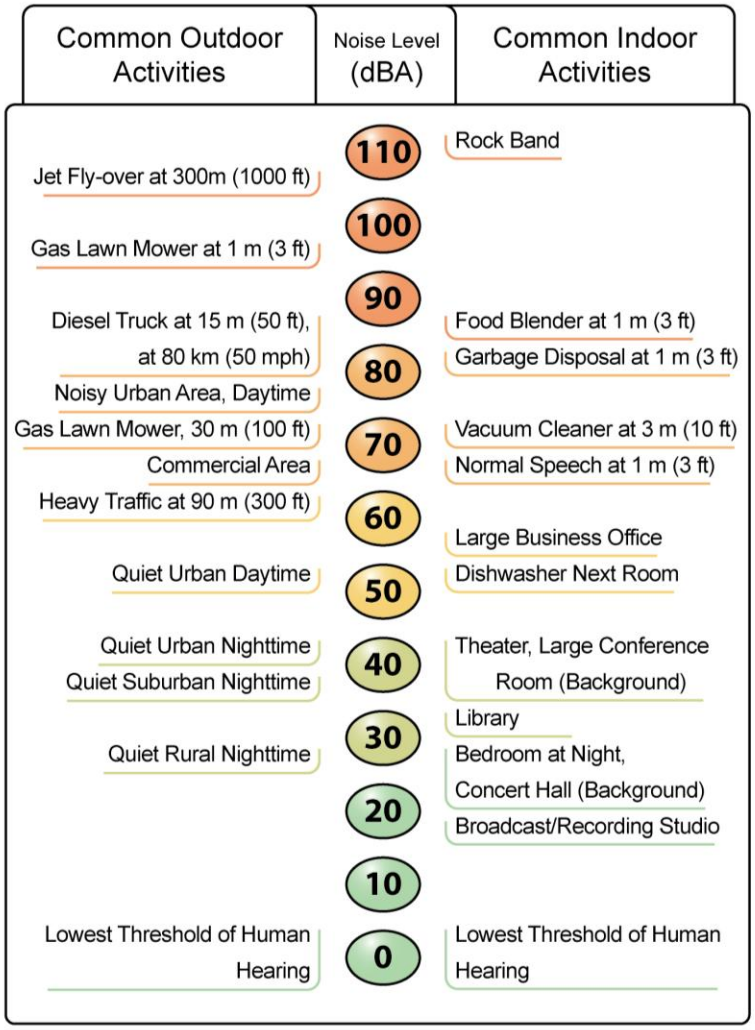


Figure 4.9-1 Noise Levels of Common Activities

According to the Caltrans Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects, May 2011, a noise impact occurs when the predicted future noise level with the project substantially exceeds the existing noise level (defined as a 12 dBA or more) or when the future noise level with the project approaches or exceeds the NAC. A noise level is considered to approach the NAC if it is within 1 dBA of the NAC.

If it is determined that a project will have noise impacts, then potential abatement measures must be considered. Noise abatement measures that are determined to be reasonable and feasible at the time of final design are incorporated into the project plans and specifications. This document discusses noise abatement measures that would likely be incorporated in the project.

Caltrans' Traffic Noise Analysis Protocol sets forth the criteria for determining when an abatement measure is reasonable and feasible. Feasibility of noise abatement is

basically an engineering concern. Noise abatement must be predicted to reduce noise by at least 5 dB at an impacted receptor to be considered feasible from an acoustical perspective. It must also be possible to design and construct the noise abatement measure for it to be considered feasible. Factors that affect the design and constructability of noise abatement include, but are not limited to, safety, barrier height, topography, drainage, access requirements for driveways, presence of local cross streets, underground utilities, other noise sources in the area, and maintenance of the abatement measure. The overall reasonableness of noise abatement is determined by the following three factors: 1) the noise reduction design goal of 7 dB at one or more impacted receptors; 2) the cost of noise abatement; and 3) the viewpoints of benefited receptors (including property owners and residents of the benefited receptors).

4.9.3.2 State Plans, Policies and Regulations

Section 14-8.02, Noise Control, of the Caltrans Standard Specifications (Caltrans 2018) provides information that can be considered in determining whether construction would result in adverse noise effects. The specification states: “Do not exceed 86 A-weighted decibels (dBA) maximum sound level (Lmax) at 50 feet from the job site from 9:00 PM to 6:00 AM.” Receptors that are located beyond 50 feet of the proposed project area do not need to be considered unless there is a reasonable expectation that noise impacts would extend beyond that boundary.

If adverse construction noise effects are anticipated, then project plans and specifications should identify abatement measures that would minimize or eliminate adverse construction noise impacts to the community. In determining the feasibility of construction noise abatement, Caltrans will consider the benefits achieved and the overall adverse social, economic, and environmental effects and the costs of the construction noise abatement measures.

4.9.3.3 Regional Plans, Policies, and Regulations

CITY OF PLACERVILLE GENERAL PLAN

Section VI (Health and Safety Element) of the City General Plan (2016) includes goals and policies intended to ensure that residents are not subjected to noise beyond acceptable levels. The City General Plan includes noise criteria for the evaluation of proposed land uses with regard to land use compatibility, and identifies noise sensitive land uses to include residential, school, and medical facilities (City of Placerville 2016). The City General Plan outlines goals and policies intended to protect residents from the harmful effects of exposure to excessive noise, as well as land use compatibility guidelines for acceptable noise levels for residential uses. There is one policy that is applicable to the proposed project’s environmental effects related to noise:

Section VI. Policy I.1: The City shall attempt, insofar as possible, to protect areas within the city where the present noise environment is considered acceptable.

4.9.4 Methodology and Thresholds of Significance

4.9.4.1 Methodology

The California Environmental Quality Act (CEQA) requires determination of the significance of noise impacts associated with proposed projects. The process of assessing the significance of noise impacts associated with the proposed project involves establishing thresholds at which significant impacts on noise-sensitive uses may occur. As mentioned previously, because this is not a Type I project, as defined by 23 CFR 772.5, the following discussion is limited to the existing noise environment and to construction generated noise. Additionally, information in this section is based on a Ground Vibration Monitoring analysis completed by Gasch Geophysical Services, Inc. (2018).

Four vibration monitoring instruments were placed to record construction vibration levels of construction activities. All four monitors were Instantel MiniMate Plus units with external, triaxial geophones set to record peak particle velocity at one minute intervals as well as any transient vibration levels generated above the preprogrammed threshold value of 0.250 inches per second(in/s). The data from the monitors were used to generate histograms showing the variance in peak particle velocities at the specified locations around the site.

4.9.4.2 Thresholds

Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects associated with noise and vibration. The following threshold questions are used to evaluate the impacts on hazards and hazardous waste as established in the Notice of Preparation (NOP) for the proposed project (2014):

a) Exposure of persons to, or generate, noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?

b) Exposure of persons to, or generate, excessive ground borne vibration or ground borne noise levels?

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

However, the Initial Study/Notice of Preparation (IS/NOP) prepared for the proposed project (**Appendix A**) determined that the proposed project would not subject people to excessive noise caused by an airport. Therefore, the following thresholds of significance are not discussed further:

e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, exposure of people residing or working in the project area to excessive noise levels?

f) For a project within the vicinity of a private airstrip, exposure of people residing or working in the project area to excessive noise levels?

4.9.5 Project Impacts

Threshold a. Exposure of persons to, or generate, noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?

CONSTRUCTION

Construction of the proposed project would result in temporary increases in ambient noise levels in the proposed project vicinity for 9 to 12 months. Noise levels would fluctuate depending on the phase of construction, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise-attenuation barriers. The loudest construction activities for the proposed project would include demolition/excavation and establishment of foundation elements, which would produce up to 88 dBA at 50 feet (**Table 4.9-4**). The excavation and foundation activities required for construction of the proposed project would primarily occur at the Clay Street Bridge over Hangtown Creek but would also occur along the section of Clay Street, Main Street and Cedar Ravine that would be realigned.

These activities would be located approximately 200 feet from the nearest residences located adjacent to the proposed project site on Cedar Ravine Road. Stationary point sources of noise attenuate (lessen) at a rate of approximately six dBA per doubling of distance from the source, depending on environmental conditions (i.e., atmospheric conditions and either vegetative or manufactured noise barriers, etc.). Therefore, the loudest phases of construction would be approximately 76 dBA Day-Night Average Sound Level (Ldn) for outdoor noise at the closest residences. Indoor noise volumes are further reduced approximately 28 dBA Ldn with windows closed.

Although there are no specific standards established for construction noise, these impacts are considered potentially significant, and to protect the residents of Placerville from the nuisance of exposure to construction noise, **Mitigation Measure NOI-1** was developed to limit construction noise.

OPERATION

The proposed project would not increase capacity for vehicles on Main Street, Clay Street, or Cedar Ravine Road. Therefore, the proposed project is not a Type 1 project, as defined by 23 CFR 772.5. The proposed project would not result in a permanent

increase in noise levels beyond those of the existing environment and is consistent with the City General Plan Section VI. Policy I.1.

MITIGATION MEASURES

Mitigation Measure NOI-1: Activities generating construction noise within the proposed project area will comply with the City's accepted standard and will be limited to the hours between 7 AM and 7 PM, Monday Through Friday, and 8 AM and 5 PM on Saturday.

If nighttime operations are required between the hours of 9:00 PM and 6 AM, the proposed project will conform to the California Department of Transportation (Caltrans) Standard Specifications, Section 14-8.02, "Noise Control." Nighttime construction noise will not exceed 86 A-weighted decibels (dBA) 1-hour A-weighted equivalent continuous sound level (Leq(h)) at a distance of 50 feet. In addition, the Contractor would equip all internal combustion engines with a manufacturer-recommended muffler and would not operate any internal combustion engine on the job site without the appropriate muffler.

Timing/Implementation: During Construction

Enforcement/Monitoring: City of Placerville, Engineering Department

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding noise levels in excess of standards established in the local general plan or noise ordinance during construction were determined to be **potentially significant** without mitigation. Therefore, mitigation measures were required or included, and the impact level would be **less than significant with mitigation**.

Threshold b. Exposure of persons to, or generate, excessive ground borne vibration or ground borne noise levels?

CONSTRUCTION

Increases in groundborne vibration levels attributable to the proposed project would be primarily associated with short-term, construction-related activities. Construction activities associated with the proposed project would require the use of equipment such as tractors, haul trucks, roller/compactors, drill rigs, and graders. For structural damage, Caltrans uses a vibration limit of 0.2 inches/second peak particle velocity (PPV) for older residential buildings. If this groundborne vibration level threshold is exceeded, the result may be "architectural" damage to normal dwellings.

Construction activities would require the use of off-road equipment such as tractors, jackhammers, and haul trucks. The use of major groundborne vibration-generating construction equipment, such as pile drivers, would not be needed for proposed

project construction. Groundborne vibration levels associated with representative construction equipment are summarized in **Table 4.9-2**.

TABLE 4.9.2 REPRESENTATIVE VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

EQUIPMENT	PEAK PARTICLE VELOCITY AT 25 FEET (INCHES PER SECOND)	PEAK PARTICLE VELOCITY AT 50 FEET (INCHES PER SECOND)	PEAK PARTICLE VELOCITY AT 100 FEET (INCHES PER SECOND)
Vibratory roller	0.210	0.098	0.046
Large Bulldozer	0.089	0.031	0.011
Caisson Drilling	0.089	0.031	0.011
Loaded Trucks	0.076	0.026	0.009
Rock Breaker	0.059	0.020	0.007
Jackhammer	0.035	0.012	0.004
Small Bulldozer/Tractors	0.003	0.001	0.000

Source: FTA 2018; Caltrans 2013

The nearest residential structure to the proposed project site is adjacent to the construction area for the new realigned intersection at Clay Street/Main Street/Cedar Ravine Road. However, construction activities would occur throughout the proposed project site and would not be concentrated at the point closest to the sensitive receptor for an extended period of time. Based on the vibration levels presented in **Table 4.9-2**, groundborne vibration generated by heavy duty equipment would not exceed approximately 0.210 inches/second PPV at 50 feet for the use of vibratory rollers. This is slightly above the vibration limit of 0.2 inches/second PPV threshold Caltrans uses.

A Ground Vibration Monitoring analysis was completed by Gasch Geophysical Services, Inc. (2018) for the proposed project to determine groundborne noise levels generated by the proposed project construction activities on older (over 50 years in age)/historic buildings within the proposed project vicinity. The Ground Vibration Monitoring analysis placed vibration monitoring instruments at several locations around the proposed project site, including in the vicinity of a National Register of Historic Places (NRHP) historic building, to measure ground vibration levels anticipated during proposed project construction activities. The report found that the highest value measured was 0.220 inches/second at a frequency of 57 hertz and was likely due to vibratory compaction equipment associated with asphalt paving work. This level is below the Konon[4] Criteria for steady state vibration of 0.250 inches/second at frequencies between 40 and 100 hertz. The maximum readings from the other three monitors measured ground vibration levels below 0.222 inches/second at 57 hertz. Although groundborne vibration on older/historic building would be under the Konon[4] Criteria limits of structural damage, the highest value measured above the

Caltrans uses a vibration limit of 0.2 inches/second PPV due to vibratory compaction equipment and would be potentially significant. **Mitigation Measure NOI-2** was developed to reduce vibratory impacts below Caltrans limit for older residential buildings.

OPERATION

Once construction is complete, all construction-generated groundborne vibration would cease. The proposed project would not result in activities that would increase operational sources of vibration, such as heavy truck travel, or stationary industrial sources, beyond what is experienced under existing conditions.

MITIGATION MEASURES

Mitigation Measure NOI-2: All rollers operated within 25 feet of older residential and historic buildings during construction activities will be run in static mode (without vibration). If vibratory equipment is required, the construction contractor is required to provide data that the required equipment is below the Caltrans vibration limit of 0.2 inches/second PPV.

Timing/Implementation: During Construction

Enforcement/Monitoring: City of Placerville, Engineering Department

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding excessive ground borne vibration or ground borne noise levels were determined to be **potentially significant** without mitigation. Therefore, mitigation measures were required or included, and the impact level would be **less than significant with mitigation**.

Threshold c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

The proposed bridge and roadway alignment would accommodate a two-lane road with sidewalks on both sides allowing for pedestrian and bicycle connections to the El Dorado Trail but would not increase capacity for vehicles in the proposed project area; therefore, the proposed project does not meet the requirements of a Type 1 project (projects requiring noise analysis), as defined by 23 CFR 772.5. The proposed project would not result in a permanent increase in noise levels beyond those of the existing environment.

The new Clay Street Bridge would safely accommodate two lanes of traffic and the intersection would be realigned to improve safety and efficiency at the Main Street/Clay Street/Cedar Ravine Road intersection; however, the proposed project would not result in new land uses. Therefore, the proposed project would not increase

traffic volumes on local roadways, and thus would not result in an increase in ambient noise levels. This impact is considered less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding a substantial permanent increase in ambient noise were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Noise from construction activities is anticipated to temporarily increase ambient noise levels in the vicinity of the proposed project. Noise at the construction site may intermittently dominate the noise environment with varying levels of intensity. The degree of construction noise impacts may also vary for different areas along the proposed project corridor, and for different construction activities. Noise from construction activities generally attenuate at a rate of 6 dBA per doubling distance. General construction equipment noise levels at a distance of 50 feet are provided in **Table 4.9-3**. General construction phase/activity typical noise levels are summarized in **Table 4.9-4**. Pile driving is not proposed as part of the proposed project.

TABLE 4.9.3 CONSTRUCTION EQUIPMENT NOISE

CONSTRUCTION EQUIPMENT	TYPICAL NOISE LEVEL (DBA AT 50 FEET)
Scrapers	85
Dozers	85
Trucks	84
Backhoe	80
Pneumatic Tools	85
Concrete Pump	82

Source: Federal Transit Administration, 2018

TABLE 4.9.4 TYPICAL CONSTRUCTION ACTIVITY NOISE	
CONSTRUCTION PHASE/ACTIVITY	LEQ AT 50 FEET AWAY FROM PROJECT CENTERLINE (DBA)
Ground Clearing	84
Demolition/Excavation	88/78
Foundation	88
Erection	79/78
Finishing	84

Source: U.S. EPA, 1971

The loudest construction activities for the proposed project would include demolition/excavation and establishment of foundation elements, which would produce up to 88 dBA at 50 feet. The excavation and foundation activities required for construction of the proposed project would primarily occur at the Clay Street Bridge over Hangtown Creek but would also occur along the section of roadway that would be realigned. These activities would be located approximately 200 feet from the nearest residences located adjacent to the proposed project site on Cedar Ravine Road, and would be potentially significant. Construction activities would be limited to the daytime hours for the duration of construction (approximately 9 to 12 months).

Stationary point sources of noise attenuate (lessen) at a rate of approximately six dB per doubling of distance from the source, depending on environmental conditions (i.e., atmospheric conditions and either vegetative or manufactured noise barriers, etc.). Therefore, the loudest phases of construction would be approximately 76 dBA Ldn for outdoor noise at the closest residences. Indoor noise volumes are further reduced approximately 28 dBA Ldn with windows closed.

Implementation of **Mitigation Measure NOI-3**, including use of mufflers and shielding of equipment, would reduce construction-generated noise levels by approximately 10 dBA (U.S. EPA, 1971). With mitigation, the proposed project would be in compliance with 23 CFR 772, Caltrans Standard Specifications Section 14-8, “Noise and Vibration.”

The proposed project would not increase capacity for vehicles on Main Street, Clay Street, or Cedar Ravine Road. Therefore, the proposed project would not result in a permanent increase in noise levels beyond those of the existing environment.

MITIGATION MEASURES

Mitigation Measure NOI-3: The project plans and specifications shall include the following requirements for construction activities, throughout all stages of construction, and be monitored/enforced by the City of Placerville, Engineering Department:

- Construction contracts must specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other State-required noise attenuation devices.
- A sign, legible at a distance of 50 feet, shall be posted at the project construction site providing contact information for the City Engineering Department and a telephone number where residents can inquire about the construction process and register complaints. This sign shall indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator will be identified to address construction noise concerns received. The coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the disturbance coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (starting too early, malfunctioning muffler, etc.) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the City. All signs posted at the construction site shall include the contact name and the telephone number for the noise disturbance coordinator.
- Identification of construction noise reduction methods. These reduction methods may include shutting off idling equipment after 5 minutes, installing temporary acoustic barriers around stationary construction noise sources, maximizing the distance between construction equipment staging areas and occupied residential areas, and using electric air compressors and similar power tools.
- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers, including, but not limited to schools, residences, libraries, hospitals or care facilities.

Timing/Implementation: *Prior to and d*uring *construction*

Enforcement/Monitoring: City of Placerville, Engineering Department

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding substantial temporary or periodic increase in ambient noise were determined to be **potentially significant** without mitigation. Therefore, mitigation measures were required or included, and the impact level would be **less than significant with mitigation**.

4.9.6 Cumulative Impacts

The proposed project does not include new land uses that would increase traffic volumes on local roadways that would, in turn, increase ambient noise levels. When considered in combination with the cumulative project list provided in **Section 3.6,**

Cumulative Projects, the proposed project would not have a cumulative impact on operational noise levels.

Construction activities associated with the proposed project and cumulative projects listed in **Section 3.6, Cumulative Projects, Table 3.6-1** may overlap, resulting in cumulative construction noise in the area if appropriate design measures and construction noise reduction measures are not taken. The City would have discretion with approvals of projects that could cumulatively generate noise. Prior to issuance of any building permits for these projects, environmental reviews would be required to determine construction and operational noise levels for nearby sensitive receptors. Permanent or temporary noise and vibration measures (e.g., sound barriers) could be required. All of the projects would be required to show compliance with the City of Placerville General Plan policies and to ensure compatibility with surrounding land uses.

Construction noise impacts of the proposed project primarily affect the areas immediately adjacent to a construction site. Thus, project-level construction noise of each project listed in **Section 3.6, Cumulative Projects, Table 3.6-1** would affect receptors within close proximity to each individual project site. Construction noise for the proposed project would be in compliance with 23 CFR 772, Caltrans Standard Specification Section 14-8, “Noise and Vibration,” and the City General Plan Noise Element and would incorporate **Mitigation Measure NO-1** through **NOI-3**. Other projects would be required to comply with similar federal, State, and local regulations, as well as any project-specific mitigation measures. Therefore, the proposed project would not contribute cumulatively to construction noise within the City.

4.10 Transportation and Traffic

4.10.1 Introduction

This section of the Recirculated Environmental Impact Report (REIR) addresses potential impacts of the Clay Street Bridge Replacement Project (proposed project) on transportation and traffic. It also describes the environmental and regulatory settings, changes to the regulatory setting, and provides mitigation measures that would reduce impacts, where applicable. Information contained within this section was provided primarily by the results of a Transportation Analysis Report prepared by Fehr & Peers (2018) and the total vehicle miles traveled (VMT) data from the EMFAC2021 model from the California Air Resource Board (CARB); these are incorporated by reference herein.

4.10.2 Environmental Setting

4.10.2.1 Regional and Local Roadway Facilities

The proposed project site is located at the east end of downtown Placerville, south of U.S. Highway 50 (US 50), and includes the Clay Street Bridge over Hangtown Creek, the Ivy House parking lot, Main Street, Clay Street, and Cedar Ravine Road, as well as the Main Street/Clay Street and Main Street/Cedar Ravine Road intersections. Because traffic includes local and regional uses, the proposed project study area of extends beyond the boundaries of the proposed project footprint and includes the following intersections: US 50/Bedford Avenue, Main Street/Bedford Avenue, Main Street/Clay Street, Main Street/Cedar Ravine Road, and Cedar Ravine Road/Pacific Street.

The US 50/Bedford Avenue intersection is one of three signalized intersections on US 50 in the City of Placerville (City). The other intersections have stop control. The Main Street intersections with Bedford Avenue and Cedar Ravine Road have all-way stop control. The other two intersections have stop signs only for the minor street approaches (Clay Street and Pacific Street, respectively), and the other approaches are uncontrolled.

4.10.2.2 Existing Safety Conditions

Table 4.10-1 lists crashes reported within 100 feet of the Main Street intersections with Clay Street and Cedar Ravine Road as provided by the City and Statewide Integrated Traffic Records System (SWITRS) database for the period from January 2004 through December 2022. A total of 24 crashes were reported, with the most prevalent crash type being a “hit object crash” followed by “sideswipe and rear-end crashes.” Only 2 of the 24 crashes involved an injury, while the rest involved property damage only.

TABLE 4.10.1 VEHICLE CRASHES BY TYPE								
INTERSECTION	HEAD ON	SIDE SWIPE	REAR END	BROAD-SIDE	HIT OBJECT	AUTO-PED	OTHER	TOTAL
Main St/Clay St	0	3	4	0	2	1	1	10
Main St/Cedar Ravine Road	1	2	1	3	5	1	0	13

Source: Statewide Integrated Traffic Records System (SWITRS), January 2004 to December 2015

Four crashes (three of them sideswipes) involved parking maneuvers. At the Main Street/Clay Street intersection, sideswipe and rear end collisions are more frequent and are likely related to the side-street stop control where drivers on Main Street do not expect to stop. At the Main Street/Cedar Ravine Road intersection, the most-frequent collision type is hit object, which is related to the Druid Monument's location in the roadway.

4.10.2.3 Bicycle and Pedestrian Facilities

The El Dorado Trail, a Class 1 separated bikeway, is located between Hangtown Creek and US 50 and currently extends through the proposed project area. The Non-Motorized Transportation Plan identifies on-street Class 3 bikeway designations for Main Street (west of Cedar Ravine Road), Clay Street, and Cedar Ravine Road. There are no on-street bicycle lanes (Class 2) in the proposed project area.

Existing pedestrian facilities in the proposed project area include sidewalks and midblock crosswalks on Main Street. Clay Street and Cedar Ravine Road have limited segments of existing sidewalk. Some of the existing pedestrian facilities are in compliance with the Americans with Disabilities Act (ADA); however, none of the midblock crosswalks on Main Street in the proposed project area have ADA-compliant curb ramps. The existing Clay Street Bridge has a substandard barrier rail and sidewalk, effectively requiring pedestrians, bicycles, and vehicles to share a one-lane road.

4.10.2.4 Transit

The El Dorado Transit's Placerville Eastbound and Westbound routes provide hourly service weekdays 7 AM to 5 PM through the study area. The Saturday Express route provides hourly service on Saturdays from 9 AM to 5 PM in both directions along Main Street. No transit stops are located adjacent to the Main Street intersections with Clay Street and Cedar Ravine Road.

4.10.3 Regulatory Setting

4.10.3.1 State Plans, Policies and Regulations

CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)

Caltrans, as assigned by the Federal Highway Administration (FHWA), directs that full consideration should be given to the safe accommodation of pedestrians and bicyclists during the development of Federal-aid highway projects (see 23 Code of Federal Regulations [CFR] 652). It further directs that the special needs of the elderly and the disabled must be considered in all Federal-aid projects that include pedestrian facilities. When current or anticipated pedestrian and/or bicycle traffic presents a potential conflict with motor vehicle traffic, every effort must be made to minimize the detrimental effects on all highway users who share the facility.

In July 1999, the U.S. Department of Transportation (USDOT) issued an Accessibility Policy Statement pledging a fully accessible multimodal transportation system. Accessibility in federally assisted programs is governed by the USDOT regulations (49 CFR 27) implementing Section 504 of the Rehabilitation Act (29 United States Code [USC] 794). The FHWA has enacted regulations for the implementation of the 1990 Americans with Disabilities Act (ADA), including a commitment to build transportation facilities that provide equal access for all persons. These regulations require application of the ADA requirements to Federal-aid projects, including Transportation Enhancement Activities.

VEHICLE MILES TRAVELED

The California Legislature passed, and the Governor signed, Senate Bill (SB) 743 (Chapter 386, 2013), directing changes to the California Environmental Quality Act (CEQA) guidelines that established VMT as the transportation metric analyzed under CEQA, effective July 1, 2020. VMT measures (in miles) how much automobile travel on roadways is associated with a proposed land use by multiplying the number of automobile trips by the total distance a vehicle travels between trip origin and destination. Utilization of VMT as the transportation CEQA metric is intended to balance the needs of congestion management with statewide goals related to infill development, transit investments, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions.

4.10.3.2 Regional Plans, Policies, and Regulations

METROPOLITAN TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

The Sacramento Area Council of Governments' (SACOG) 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) is the latest update of a long-range policy and planning program that establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035, and thus establishes an overall GHG target for the region beyond 2040. SACOG prepares the MTP/SCS to

provide federally mandated long-range transportation planning for the six-county area that includes El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties. SACOG collaborates with the El Dorado County Transportation Commission (EDCTC) to maintain consistency across county plans and the broader regional framework. The proposed project is included in the 2023-26 SACOG Metropolitan Transportation and Improvement Program (MTIP) as a line-item project.

SACRAMENTO-PLACERVILLE TRANSPORTATION CORRIDOR MASTER PLAN

The Sacramento-Placerville Transportation Corridor Master Plan (2003) outlines a strategy for interim and long-term uses for the former Sacramento-Placerville railroad corridor. This corridor was purchased by the Sacramento-Placerville Transportation Corridor Joint Powers Authority, which is comprised of representatives of El Dorado County, Sacramento County, the Sacramento Regional Transit District, and the City of Folsom. The Master Plan identifies multiple possible uses such as excursion trains, trails, and utility easements.

EL DORADO COUNTY TRANSPORTATION COMMISSION

The El Dorado County Transportation Commission (EDCTC) was designated as the Regional Transportation Planning Agency (RTPA) for El Dorado County on July 23, 1975. As the RTPA, the EDCTC serves as the planning and programming authority for transportation projects on the western slope of El Dorado County, excluding those areas within the Tahoe Regional Planning Agency boundaries. The Commission consists of three members of the El Dorado County Board of Supervisors and three members of the Placerville City Council. The Caltrans District 3 Director and a City of South Lake Tahoe Council member serve as ex-officio members of the Commission.

EL DORADO COUNTY LONG RANGE TRANSIT PLAN

The El Dorado County Long Range Transit Plan (2003) outlines long-term planning steps required in order for public transit service in El Dorado County (County) to respond to continued growth of the County population. The plan recommends a focus on commuters traveling to Sacramento County, as well as key markets such as elderly/disabled services and activity center shuttles. The County's transit system serves the City. The Historic area of downtown Placerville is identified in the County's General Plan Transportation and Circulation Element as one of many attractions in the County responsible for most of the travel demand on the transportation system within the County.

CITY OF PLACERVILLE NON-MOTORIZED TRANSPORTATION PLAN

The City adopted the Final Non-Motorized Transportation Plan (NMTP) in October 2010. This plan was created to address several issues related to non-motorized transportation. The NMTP is meant to provide a blueprint for the development of an ultimate bikeway system through the City, as well as providing for compliance with Caltrans Streets and Highways Code (Section 890-894.2). In addition, the Pedestrian Element of this plan is meant to identify some of the missing links in the City's

pedestrian system and includes pedestrian friendly and traffic calming concepts that can be utilized to improve the conditions of pedestrian travel in the City.

CITY OF PLACERVILLE PEDESTRIAN CIRCULATION PLAN

The City adopted the Pedestrian Circulation Plan (Ped Plan) on January 23, 2007. The Ped Plan is an extension of the NMTP and is meant to provide a more detailed analysis. The Ped Plan provides priorities and options for funding a subsequent "Pedestrian Circulation Improvement Program" for the ultimate construction and maintenance of an extensive sidewalk network throughout the City.

In order to improve the sidewalk system within Placerville, the City has increased the number of funding options to generate sufficient revenue to repair existing sidewalks. The methods that the City uses to fund sidewalk improvements are:

- Property-owner maintenance of existing sidewalks – Per City Code, maintenance of existing sidewalks is the responsibility of the adjacent property owners.
- Conditions on development projects – New development is required to install sidewalks within the development area as a condition of project approval. This can occur as part of the development project or can be part of a deferred frontage improvement agreement.
- State and federal grants – The City applies for grants through various State and Federal programs including the Active Transportation Program, Congestion Mitigation and Air Quality Improvement Program, and the Highway Safety Improvement Program.

CITY OF PLACERVILLE MAIN STREET STREETSCAPE DESIGN DEVELOPMENT PLAN (2006)

The Main Street Streetscape Design Development Plan presents community design ideas for Main Street, as well as provides cost estimates and implementation guidance. The Plan recommends the adoption of a roundabout for the realignment of Clay Street as set forth in the Placerville Streetscape Concept Design (p. II-18 – II-20; III-5) identified in 1974 and 2006. However, due to public opposition, the roundabout was removed as an alternative for this project on July 8, 2014 by City Council resolution.

CITY OF PLACERVILLE GENERAL PLAN

Section III (Transportation Element) of the City General Plan identifies policies that provide guidance for and promote the development of a circulation system that is beneficial for all modes of transportation, correlated with the planned land use pattern in the City, and facilitates easy access through and within the City. As part of the General Plan, the Circulation Plan Diagram is the roadway-specific map that illustrates the official classification of existing and proposed streets and roads within the Placerville General Plan Area. Section I (Land Use) and Section VII (Community Design) also contain policies regarding pedestrian safety and parking.

The General Plan classifies Main Street and Cedar Ravine Road as minor arterials and Clay Street as a local street. According to the General Plan, the City defines streets as such:

- Major Arterial - A continuous street located to serve arterial traffic and designed to minimize access to abutting property via driveways, alleys, and business entrances. Major arterials should not penetrate neighborhoods and should be planned so as to eliminate through traffic in residential neighborhoods and adjacent to schools
- Minor Arterial – A continuous street located to provide direct route between, but not through separate neighborhoods. Minor arterials should be planned to discourage through traffic in residential neighborhoods and adjacent to schools.
- Collector Street - A non-continuous street located to collect traffic from local streets and distribute it to minor and major arterials. The difference, other than size, between a collector and an arterial is that a collector penetrates a neighborhood while an arterial does not.
- Local Street – A street, other than a collector or arterial, providing access to abutting property and designed to discourage through traffic.
- Cul-de-sac - A local street terminating in a turning area and generally not exceeding 400 feet in length.

Section I. Policy C.9.c: Provide for adequate parking and vehicular access.

Section III. Policy A.1: The City shall strive to attain the highest possible traffic levels of service consistent with the financial resources available and within the limits of technical feasibility.

Section III. Policy A.2: Streets shall be dedicated, widened, extended, and constructed according to the City's Master Street Plan and the street cross-sections shown in the Street Standards figures in Part I [of the Master Street Plan]. Rights-of-way shall be reserved according to the specifications of the Master Street Plan. Deviations from the street cross-sections shown in Part I shall be allowed based upon a determination by the Public Works Director that safe and adequate public access and circulation are preserved by such deviations.

Section III. Policy A.9: The City shall aggressively pursue state and federal funding to implement the City's Circulation Plan.

Section III. Policy C.2: In the development of new projects, the City shall give special attention to maintaining adequate corner-sight distances at city street intersections and at intersections of city streets and private access drives and roadways.

Section III. Policy F.1: Pedestrian circulation needs and convenience in the downtown shall be given priority over the needs of through traffic.

Section VII. Policy B.5: The City shall promote design concepts which will contribute to better pedestrian convenience and safety.

4.10.4 Methodology and Thresholds of Significance

4.10.4.1 Methodology

In approximately 2009, the California Natural Resources Agency approved revisions to the CEQA Guidelines, deleting the CEQA Appendix G checklist question regarding parking availability. Physical impacts to the environment from a project as a result of parking changes are analyzed under CEQA in the appropriate resources section, for example consistency with City policies regarding parking, or air quality impacts during project operation.

In 2018 the California Office of Planning and Research (OPR) prepared a comprehensive update to the CEQA Guidelines and provided the update to the California Natural Resources Agency. The CEQA Guidelines update was approved by the California Office of Administrative Law, effective December 28, 2018. As part of this update, CEQA Guidelines added Section 15064.3, Determining the Significance of Transportation Impacts. This section focuses on VMT, rather than level of service (LOS) for evaluating impacts based on the traffic. In addition, CEQA Guidelines Appendix G, Environmental Checklist Form, was revised to include evaluating traffic and transportation impacts by evaluating VMT as the metric rather than LOS. LOS analyses are analyzed under CEQA in the appropriate resources section, for example consistency with City policies regarding intersection LOS, or air quality impacts during project operations.

The following analysis was conducted to determine the impacts of the proposed project on transportation and traffic, including impacts to VMT, non-vehicle modes or transportation, and emergency routes. This section is based on traffic information presented in the Transportation Analysis Report prepared by Fehr & Peers (2018). In addition, SB 743, as mentioned in **Section 4.10.3, Regulatory Setting**, directed changes to CEQA guidelines to establish VMT as the transportation metric analyzed under CEQA. This went into effect July 1, 2020. Therefore, this section is also based on the VMT data from CARB's EMFAC2021.

4.10.4.2 Thresholds

Appendix G to the California Environmental Quality Act (CEQA) Guidelines addresses typical adverse effects associated with transportation and traffic. The following threshold questions are used to evaluate the impacts on traffic and transportation:

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

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

d) Result in inadequate emergency access?

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

CEQA Guidelines Section 15064.3 (b) provides criteria for analyzing transportation impacts. Section 15064.3 (b)(2) states:

> Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

CEQA does not have LOS or parking thresholds of significance; therefore, LOS and parking are not discussed in the impact analysis below. However, because LOS and parking were concerns brought up in the Peremptory Writ of Mandate (Writ) issued by the El Dorado County Superior Court in February 2012, at the public meetings and public comment periods this project to date, **Section 4.10.7, Traffic Information**, discusses LOS and parking, for informational purposes only.

4.10.5 Project Impacts

Threshold a. Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

CONSTRUCTION

The proposed project would result in temporary, short-term increases in local traffic as a result of construction-related workforce traffic (employee travel to and from the site), heavy equipment delivery (e.g., cranes and bulldozers), and material deliveries (e.g., building materials, gravel, concrete, and other related materials necessary for proposed project development). Construction is expected to last approximately 9 to 12 months and commence in late 2025 or 2026 with operation of the proposed project commencing in 2026.

During construction, Clay Street would be closed between Main Street and the US 50 underpass. Construction activities would result in temporary, lasting no more than 12

months, disruption of connectivity by requiring detours for pedestrians, bicyclists, and motorists. The Clay Street detour is not anticipated to significantly increase travel times for pedestrians, bicyclists, or motorists. Access to all businesses and residences will be maintained for the duration of construction. Therefore, the construction activities and roadway closure would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant.

OPERATION

Funding for the proposed project has been programmed from multiple federal, state, and local sources including the Highway Bridge Program (HBP), Regional Surface Transportation Program (RSTP) Exchange, and local developer Traffic Impact Mitigation (TIM) fees, City Measure H Fund, City Measure L Fund, and Water and Sewer enterprise funds. The proposed project and funding sources are listed in the currently approved regional plan and program are the Sacramento Area Council of Governments (SACOG) and the 2023-2026 SACOG Metropolitan Transportation Improvement Program (MTIP).

The proposed project is listed in the 2023-2026 SACOG MTIP as: Safety: Widening narrow pavements or reconstructing bridges (no additional travel lanes) project. The proposed project would remove the existing Clay Street Bridge, a concrete bridge that does not meet current design standards and replace it with a new concrete bridge designed to current structural and geometric standards that would provide adequate, reliable, and safe service for vehicle, bicycle and pedestrian traffic. As such, the proposed project is considered a safety improvement project.

All proposed project components would be constructed in accordance with the requirements of the City Master Street Plan (implemented as part of the City General Plan Section III. Policy A.2). The proposed project design would be consistent with the City's street and parking standards. Additionally, the proposed project would provide a safer facility for vehicles as well as bicycles and pedestrians. The proposed project design includes ADA-compliant pedestrian crosswalks and curb ramps at the Main Street/Clay Street/Cedar Ravine Road intersection and new ADA-compliant pedestrian facilities along Clay Street and the bridge, which would improve safety, pedestrian and bicycle connections to the El Dorado Trail and residential neighborhoods north of the bridge. Additionally, the bicycle and pedestrian improvements would eliminate deficiencies in the area for non-motorized traffic, as well a safe and continuous route to public transit locations for neighborhoods located north of the bridge.

The proposed project would be consistent with all applicable plans and policies, including the County General Plan, City General Plan, City Main Street Streetscape Design Development Plan, City of Placerville Non-Motorized Transportation Plan and the City Development Guide. Applicable Plans and Policies and the proposed project's consistency are discussed in detail in **Table 4.8-1, Section 4.8, Land Use.** Impacts are considered less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE

Impacts regarding conflicts with a program, plan, ordinance, or policy addressing the circulation system were determined to be **less than significant** without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

CONSTRUCTION

Clay Street would be closed between Main Street and just north of the US 50 underpass. Traffic accessing the portion of Clay Street immediately north of US 50 would be detoured via northbound Bedford Avenue to Coleman Street to Clay Street or northbound Mosquito Road to Clay Street. The total detour length is approximately 1 mile. Access to residences along Clay Street would be maintained at all times during construction.

This proposed detour would add approximately one mile to VMT for vehicles that would normally use Clay Street between Main Street and US 50. The increase of one mile VMT per vehicle during construction would be temporary in nature, lasting approximately 9 to 12 months. Upon construction completion, Clay Street between Main Street and US 50 would be reopened for use, and the detour would cease to be necessary.

The proposed project would require a peak construction workforce of up to 45 workers. Construction workers are expected to travel to the project site from various locations throughout the Sierra Nevada Mountain range foothills and the greater Sacramento area. Given that construction activities would occur for approximately 9 to 12 months, and because of the large workforce in the Sierra Nevada Mountain range foothills and the greater Sacramento area, it is not anticipated that construction workers would have an increase in VMT during construction because they already travel within a large geographic area. Therefore, construction of the proposed project would not increase VMT for construction workers. Impacts on VMT from proposed project construction would be less than significant.

OPERATION

The proposed project would replace the existing Clay Street Bridge with a two-lane bridge, conforming to Clay Street north and south of Hangtown Creek. Upon construction completion, the proposed project would have approximately 12,876 VMT, similar to existing conditions. The proposed project is considered a safety improvement project that would not increase roadway capacity in the proposed project area. Therefore, by nature, the proposed project would not increase VMT.

The proposed project would include sidewalks on both sides of Clay Street and allow for a Class 3 on-street bicycle facility along Clay Street to connect to the El Dorado Trail. The proposed project would provide a more complete and connected system of sidewalks on Clay Street and Main Street. Crosswalks would be located at the stop signs rather than unprotected, midblock crossings, in turn making for a safer pedestrian environment. These improvements allow for safer pedestrian and bicycle traffic movements, including safer pedestrian and bicycle connections to the El Dorado Trail. Thus, the proposed project would provide improved connectivity in the proposed project area for alternate modes of transportation, encouraging non-motorized travel.

Transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact. Therefore, impacts are considered less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE

Impacts regarding conflicts or being inconsistent with CEQA Guidelines section 15064.3, subdivision (b) were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

Threshold c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project, including public roadways, driveways conforms and parking, would be designed and constructed in compliance with the goals, policies and design criteria described in the City Master Street Plan. Roadways, intersection, and driveway design would meet or exceed Caltrans and City safety and performance standards.

CONSTRUCTION

Prior to construction activities, the proposed project would require the delivery of heavy construction equipment using area roadways. The use of oversize vehicles during construction can create a hazard to the public by limiting motorist site lines on roadways and by the obstruction of space. Movement of the heavy construction equipment can result in incompatible uses on local roadways because heavy equipment is often larger than a standard, or substandard, lane width, often travel at lower speeds than personal vehicles, require more time for acceleration and deceleration, and have wider turning radius than personal vehicles. In addition, heavy vehicles operating in the proposed project area during construction could cause damage to streets, and potentially lead to road closures. These conflicts would be temporary, lasting approximately 9 to 12 months, and would cease upon construction

completion. The introduction of construction related traffic would have the potential to increase accident rates; however, with the implementation of **Mitigation Measure TRAF-1**, impacts would be less than significant.

OPERATION

The Clay Street Bridge was inspected by Caltrans in 2020 and has an overall Sufficiency Rating (SR) of 52.6 out of 100, a decrease from the 62.6 SR in the 2016 inspection reports, showing a dramatic decline in the course of four years. The Existing bridge is approximately 100 years old and has reached the end of its service life (American Association of State Highway and Transportation Officials [AASHTO] LRFD Bridge Design Specs Section 1.2 defines “design life” of a bridge as 75 years). Additionally, the Clay Street Bridge is a single lane bridge that does not meet current design standards (previously defined as functionally obsolete). The bridge has two substandard concrete railings and a narrow at-grade sidewalk that pose a present risk to pedestrian safety.

There are existing issues with the intersection configuration of Main Street/Clay Street and Main Street/Cedar Ravine Road. At the Clay Street intersection, sideswipe and rear end collisions are most frequent and are likely related to the side-street stop control where drivers on Main Street do not expect to stop. At Cedar Ravine Road, the most-frequent collision type is hit object, which is related to the Druid Monument’s location in the roadway. Vehicle size has increased since the Druid Monument was first placed and constructed, thus putting it at a higher risk of being damaged by vehicles in its existing location, as occurred in 2006 when the monument was hit by a gravel delivery truck. Delivery trucks and emergency vehicles traveling to and from Marshall Hospital, which is located just south of the intersection on Cedar Ravine Road, have the most risk of accidentally striking the Druid Monument. Additionally, Currently, fire trucks routinely would have to wait for a car to pass the bridge before continuing. The proposed project would improve current emergency response times, since the proposed bridge will accommodate two lanes of traffic moving simultaneously.

The proposed project would meet AASHTO standards, and the new barriers would meet AASHTO standards for height, allowing for a safer structure for both pedestrian and vehicular traffic.

Bringing Clay Street into the Main Street/Cedar Ravine Road intersection would reduce the potential for sideswipe and rear end collisions compared to the side-street control at the existing Main Street/Clay Street intersection. Adjusting the northbound and westbound approaches at Cedar Ravine Road may help to reduce vehicle turning speed and reduce intersection conflicts. Thus, the proposed project would have positive safety impacts on the project area for traffic movements. Additionally, moving the Druid Monument from its original location approximately 45 feet west would provide a more protected location from traffic movements and would allow for safe pedestrian access to the monument. Improved access would positively highlight the

Druid Monument as a valued historical resource for the community and provide safety for the United Ancient Order of Druids who make annual pilgrimages to the monument.

The proposed project would provide Class 3 on-street bicycle facility along Clay Street to connect the El Dorado Trail (a Class I bicycle facility) to Main Street. The City's non-motorized transportation plan shows on-street Class 3 bikeway designations for Main Street (west of Cedar Ravine Road), Clay Street, and Cedar Ravine Road. The proposed project would provide a more complete and connected system of sidewalks with ADA improvements and crosswalks at the stop signs rather than unprotected, midblock crossings, in turn making it safer for non-motorized traffic (i.e., pedestrian or bicycle traffic).

Overall, the proposed project would improve vehicle traffic safety on Main Street, Clay Street, and Cedar Ravine Road. It would improve bicycle and pedestrian facilities and allow for safer access along and across Main Street, Clay Street, and Cedar Ravine Road. It would also provide safer access to the El Dorado Trail. Therefore, operations impacts are less than significant, and could ultimately be beneficial.

MITIGATION MEASURES

Mitigation Measure TRAF-1: The City shall prepare and implement a Construction Traffic Management Plan prior to and throughout all stages of construction. The City of Placerville Engineering Department shall monitor and enforce the implementation of the Construction Traffic Management Plan.

All construction activities shall be coordinated with the El Dorado County Fire Protection District and the City of Placerville Police Department to ensure that emergency detour access will be maintained to the neighborhoods north of the bridge. The City shall also notify El Dorado Transit of activities that could affect transit routes during construction. At no time during the construction period will the entire width of Main Street or Cedar Ravine Road be closed to emergency vehicle traffic. At no time during the construction period will the entire width of Clay Street north of US 50 be closed to emergency vehicle traffic. The City shall provide advance notification to residents and businesses that could be affected by the roadway improvements and ensure access to all residences and businesses that could be temporarily affected by construction activities will be provided at all times.

- Parking: To minimize and reduce parking impact, project team members will conduct meetings with owners of affected businesses during the final project design phase and assess the parking needs. Parking spaces, including on-street parking, public parking lots, or private parking areas, would be accommodated where feasible.
- Detour/Road Closures: Detour signage will be installed near construction zone to effectively redirect traffic. Potential adverse impacts to circulation and access will be avoided by maintaining as many open lanes as possible

along Main Street and Cedar Ravine Road in both directions during construction. The detour/road closure will also consider routes for delivery trucks entering and exiting the project area in the Historic District of Placerville..

- Media Campaign: A Media Campaign will be organized to release information regarding road closure, detour routes, construction location, construction schedule, and other information related to transportation.

Timing/Implementation: Prior to and during construction

Enforcement/Monitoring: City of Placerville, Engineering Department

LEVEL OF SIGNIFICANCE

Impacts regarding the potential of the proposed project to substantially increase hazards due to incompatible use during construction were determined to be **potentially significant** without mitigation. Therefore, mitigation measures were required or included, and the impact level would be **less than significant with mitigation**.

Threshold d. Would the project result in inadequate emergency access?

CONSTRUCTION

During construction, Clay Street would be closed between Main Street and just north of the US 50 overpass. Traffic accessing Clay Street north of US 50 would be detoured via Bedford Avenue to Coleman Street or Mosquito Road to Clay Street. The total detour length is approximately one mile. This could affect emergency response or evacuation times. Construction activities associated with the intersection modifications at Main Street/Cedar Ravine Road have the potential to cause lane closures or narrowing, or detours, depending on the activity, in the immediate vicinity of the project site, which could also affect emergency response or evacuation times. To minimize traffic disruption, after consulting with the County Fire Protection District and the City Police Department, the City would implement **Mitigation Measure TRAF-1**, which requires a Construction Traffic Management Plan for the construction phase to be utilized throughout the duration of construction activities. The Construction Traffic Management Plan would maintain emergency access or detour access. The proposed project would have a less than significant impact on emergency access with the implementation of **Mitigation Measure TRAF-1**.

OPERATION

Operation of the proposed project would improve current traffic congestion conditions at the proposed project site and improve current emergency response times. The proposed project would not result in design hazards that could affect intersection or roadway safety and conflicting turn movements, and the wider, two-lane Clay Street Bridge would benefit safe emergency response vehicle passage from its current one-

lane configuration that accommodates two-way traffic. In addition, the Druid Monument would be relocated up to 45 feet west of its current location to a raised concrete island and placed in a non-centralized location between the through lane and the right turn lane of eastbound Main Street to protect against potential traffic collisions, specifically against larger vehicles such as emergency response vehicles. This would allow for safer access through the intersection and would benefit safe emergency response vehicle passage. Therefore, impacts are considered beneficial to emergency access.

The Greater Placerville Wildfire Evacuation Preparedness, Community Safety, and Resilience Study (2024), prepared by the El Dorado County Transportation Commission, identifies Clay Street as a high priority location of concern for evacuation and circulation during an emergency because of the condition of the Clay Street Bridge as well as the width of the existing Clay Street Bridge, which is narrower than the existing roadway width to the north and south of the bridge. The proposed project would help to eliminate this area of concern by replacing the bridge to conform to existing roadway width north and south of Hangtown Creek. Therefore, the proposed project would not conflict with the Greater Placerville Wildfire Evacuation Preparedness Study, but rather, would eliminate the concern of a bottleneck at the Clay Street Bridge due to its narrow width and one-lane use. This is a beneficial impact for emergency access.

MITIGATION MEASURES

Implement **Mitigation Measure TRAF-1.**

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts regarding inadequate emergency access during construction were determined to be **potentially significant** without mitigation. Therefore, mitigation measures were required or included, and the impact level would be **less than significant with mitigation**.

Threshold e. Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

CONSTRUCTION

Clay Street would be closed between Main Street and just north of the US 50 underpass. Bicyclists and pedestrians accessing the portion of Clay Street immediately north of US 50 would be detoured via northbound Bedford Avenue to Coleman Street to Clay Street or northbound Mosquito Road to Clay Street. The portion of the El Dorado Trail that crosses Clay Street and a short distance to the east and west would also be closed temporarily but a detour would be available at Locust Avenue (to Main Street) and at Bedford Avenue (to Main Street). Pedestrian and bicycle access will be provided during the duration of construction.

Construction activities would result in temporary, lasting no more than 12 months, disruption of connectivity by requiring detours for pedestrians, bicyclists, transit and motorists. The Clay Street detour is not anticipated to significantly increase travel times for pedestrians, bicyclists, or motorists, although travel through the project area along Main Street and Cedar Ravine Road may experience slower than average speeds during certain phases of construction. Access to all businesses and residences will be maintained for the duration of construction. Therefore, the construction activities, roadway closure, and El Dorado Trail closure would not conflict with adopted policies, plans, or programs addressing transit, bicycle, or pedestrian facilities. Impacts would be less than significant.

OPERATION

The proposed project would replace the existing Clay Street Bridge with a two-lane bridge, conforming to Clay Street north and south of Hangtown Creek. The proposed project would provide Class 3 on-street bicycle facilities on Clay Street to connect with the El Dorado Trail (a Class 1 bicycle facility). This is consistent with the City's non-motorized transportation plan, which shows on-street Class 3 bikeway designations for Main Street (west of Cedar Ravine Road), Clay Street, and Cedar Ravine Road.

The proposed project would replace the existing Clay Street Bridge with a two-lane bridge containing sidewalks and Class 3 bicycle facilities on both sides of the road, allowing for safer pedestrian and bicycle connections to the El Dorado Trail. The proposed project would provide a more complete and connected system of sidewalks on Clay Street and Main Street. Crosswalks would be located at the stop signs rather than unprotected, midblock crossings. These improvements allow for safer pedestrian and bicycle traffic movements throughout the proposed project area.

The proposed project would not affect bus routes or stops in the proposed project area. No transit stops are located adjacent to the Main Street intersections with Clay Street and Cedar Ravine Road. The proposed project design would be consistent with the City's street and parking standards. Additionally, the proposed project would provide a safer facility for pedestrians and multi-modal transportation sources.

The proposed project would be consistent with all applicable plans and policies involving public transit, bicycle and pedestrian facilities and safety, including those the plans discussed in **Section 4.10.3, Regulatory Setting**. Policy specific discussions and the proposed projects consistency are detailed in **Table 4.8-1, Section 4.8, Land Use.** Impacts would be less than significant.

MITIGATION MEASURES

None Required.

LEVEL OF SIGNIFICANCE

Impacts regarding conflicting with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decreasing

the performance or safety of such facilities were determined to be **less than significant** without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains **less than significant.**

4.10.6 Cumulative Impacts

The cumulative traffic analysis incorporates the growth assumptions in the El Dorado County Travel Demand Forecasting Model. The land use growth included in the model includes the approved tentative maps including Cottonwood Park Phases 4 and 6, Adams Way, and Country Club/Cedar Ravine rezone sites, and the Marshall Medical Marshall Center Offsite Parking and General Plan Amendment and Rezone. It also includes the El Dorado County Transportation Commission and City's US 50 Corridor Action Plan, also known as "Trip to Green". The cumulative projects considered for the proposed project are provided in **Section 3.6, Cumulative Projects, Table 3.6-1**. The cumulative context for the analysis of traffic, pedestrian and bicycle facilities, parking facilities, safety, and emergency access impacts is limited to downtown Placerville.

The proposed project would provide a more complete and connected system of bicycle facilities and sidewalks on Clay Street and Main Street. Crosswalks would be located at the stop signs rather than unprotected, midblock crossings,currently available. These improvements allow for safer pedestrian and bicycle traffic movements, including safer pedestrian and bicycle connections to the El Dorado Trail. Thus, the impacts of the proposed project would not have the potential to combine with impacts from past, present, or reasonably foreseeable projects to result in a cumulative impact. Cumulative impacts are considered less than significant.

Specific to VMT, upon construction completion, VMT would be approximately 12,876. However, when combined with the cumulative projects, including the Trip to Green program (refer to **Section 3.6, Cumulative Projects, Table 3.6-1**), VMT would be reduced to approximately 8,605 VMT. As discussed above, CEQA Guidelines Section 15064.3 (b) states that transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact. Therefore, cumulative VMT is reduced in comparison to existing VMT and impacts are considered less than cumulatively significant.

4.10.7 Traffic Information

As mentioned above, in approximately 2009, the CEQA Guidelines were revised and deleted the CEQA Appendix G checklist question regarding parking availability. In 2018, the CEQA Guidelines were revised and deleted the CEQA Appendix G checklist question regarding LOS. The LOS and parking are not considered thresholds to addresses typical adverse effects for the REIR, as such, do not require impact analyses, mitigation measures, or level of significance determinations. However, discussions below are provided in this section for informational purposes only.

Level of Service

LOS is a qualitative measure describing the operating condition for vehicles at intersections. There are six LOS levels, A through F, which represent driving conditions from best to worst, respectively. In general, LOS A represents free-flow conditions with no congestion, and LOS F represents severe congestion with stop-and-go conditions. For this analysis, intersections operating over capacity (LOS F) are considered to have unacceptable operations. The LOS rating for intersections is based on the average control delay expressed in seconds per vehicle. The criterion for each individual LOS is provided in **Table 4.10-2** below.

TABLE 4.10.2 INTERSECTION LOS CRITERIA

Level of Service (LOS)	Average Delay (seconds per vehicle)		Description
	Stop Control	Signal Control	
A	<10.0	<10.0	Little or no delay
B	>10.0 to 15.0	>10.0 to 20.0	Short vehicle delays
C	>15.0 to 25.0	>20.0 to 35.0	Average vehicle delays
D	>25.0 to 35.0	>35.0 to 55.0	Long vehicle delays
E	>35.0 to 50.0	>55.0 to 80.0	Very long vehicle delays
F	>50.0	>80.0	Extreme vehicle delays-demand exceeds capacity

Source: Highway Capacity Manual (Transportation Research Board, 2010)

Traffic includes local and regional uses; therefore, the study area extends beyond the boundaries of the proposed project footprint. The study area includes the following intersections: US 50/Bedford Avenue, Main Street/Bedford Avenue, Main Street/Clay Street, Main Street/Cedar Ravine Road, and Cedar Ravine Road/Pacific Street.

EXISTING CONDITIONS

The majority of the intersections operate at LOS C or better during AM and PM peak hours. The Pacific Street/Cedar Ravine Road intersection operates at LOS D during the AM peak hour due to the high delay for eastbound left-turn movements. Queues currently build up during AM and PM peak hours. When this occurs, some drivers use the Ivy House parking lot to bypass the Main Street/Cedar Ravine Road intersection. **Table 4.10-3** depicts the intersection operations for the study area.

TABLE 4.10.3 INTERSECTION OPERATIONS – EXISTING CONDITIONS

INTERSECTION	CONTROL	AM PEAK HOUR			PM PEAK HOUR		
		LOS	DELAY[1]	SIGNAL WARRANT[2]	LOS	DELAY[1]	SIGNAL WARRANT[2]
US 50/Bedford Avenue	Signal	C	26	-	C	21	-
Main St/Bedford Avenue	All Way Stop	C	18	No	C	22	Yes

TABLE 4.10.3 INTERSECTION OPERATIONS – EXISTING CONDITIONS							
INTERSECTION	CONTROL	AM PEAK HOUR			PM PEAK HOUR		
		LOS	DELAY[1]	SIGNAL WARRANT[2]	LOS	DELAY[1]	SIGNAL WARRANT[2]
Main Street/Clay Street	Side Street Stop	C	20	No	B	15	No
Main Street/Cedar Ravine Road	All Way Stop	A	8	No	B	10	No
Pacific Street/Cedar Ravine Road	Side Street Stop	D	30	No	C	24	No

Source: Fehr & Peers 2018

Notes:

1 Average intersection delay, in seconds per vehicle, reported for all-way stop intersections. Worst movement delay, in seconds per vehicle, reported for side-street stop streets.

2 Indicates if the peak-hour volume warrant from the California Manual of Uniform Traffic Control Devices (2014) is met. Satisfying the peak-hour warrant should not serve as the only basis for deciding whether and when to install a signal. To reach such a decision, the full set of signal warrants should be investigated based on field-measured traffic data and a thorough study of traffic and roadway conditions.

METHODOLOGY

To determine intersection delay and LOS, Synchro/SimTraffic, a microsimulation analysis tool that models the interaction of vehicles, traffic control, and lane geometry, was utilized. The traffic volumes (vehicles, bicycles, and pedestrians), traffic control (signal and stop signs), and roadway configuration (number and type of turning lanes) were entered into the model. The Synchro/SimTraffic model accounts for interaction between adjacent intersections, between queues in turn pockets and through lanes, and between vehicles and pedestrians. The cumulative traffic volumes were developed using the El Dorado County Travel Demand Forecasting Model (Version – EDC_CAT_03_2014). A detailed subarea model was prepared for the proposed project area by adding roadway links, adjusting how traffic accessed the network, and verifying land use data. The validated model was used to generate traffic volumes for cumulative conditions.

PROPOSED PROJECT CONDITIONS

Table 4.10-4 compares the LOS and intersection average delay for existing traffic volumes for the current roadway network (no project) to the proposed Clay Street Bridge replacement project (proposed project).

TABLE 4.10.4 INTERSECTION OPERATIONS – NO PROJECT AND PROPOSED PROJECT					
		NO PROJECT LOS/DELAY		PROPOSED PROJECT LOS/DELAY	
INTERSECTION	CONTROL	AM	PM	AM	PM
1. US 50/Bedford Ave	Signal	C/26	C/21	C/27	C/21
2. Main St/Bedford Ave	All Way Stop	C/18	C/22	C/17	C/20
3. Main St/Clay St	Side Street Stop	C/20	B/15	-	-
4. Main St/Cedar Ravine Rd[1]	All Way Stop	A/8	B/10	B/12	B/15
5. Pacific St/Cedar Ravine Rd	Side Street Stop	D/30	C/24	C/20	C/18

Source: Fehr & Peers, 2018

Notes: LOS and average intersection delay, in seconds per vehicle.

1. Intersection includes Clay Street as fourth leg in Intersection 4 under the proposed project condition.

With the implementation of the proposed project, the US 50/Bedford Avenue and Main Street/Bedford Avenue intersections are predicted to be primarily unaffected by the proposed project and the delay changes are negligible. The Pacific Street/Cedar Ravine Road intersection AM peak hour would improve from LOS D to LOS C with a reduction in delay. For PM peak hour, LOS would remain LOS C and the delay changes are negligible. The proposed project would result in the reconfiguration of the Main Street/Clay Street intersection and the Main Street/Cedar Ravine Road intersection, to form one all-way stop controlled intersection (Main Street/Clay Street/Cedar Ravine Road). This would result in overall LOS B for AM and PM peak hours.

Two intersections, Main Street/Bedford Avenue and Pacific Street/Cedar Ravine Road, were found to need signalization to provide reasonable traffic operations under the cumulative conditions with or without the proposed project. The overall traffic growth rate, approximately 2 percent per year, is consistent with growth in population (1 percent per year) and employment (4 percent per year) planned for the proposed project area. **Table 4.10-5** depicts AM and PM peak-hour traffic conditions and delay time under the cumulative year.

TABLE 4.10.5 INTERSECTION OPERATIONS – CUMULATIVE CONDITIONS					
		NO PROJECT		PROPOSED PROJECT	
INTERSECTION	CONTROL	AM	PM	AM	PM
1. US 50/Bedford Ave	Signal	F/95	F/93	F/94	F/93
2. Main St/Bedford Ave	Signal	D/38	F/113	D/49	F/111
3. Main St/Clay St	Side Street Stop	F/53	F/79	-	-
4. Main St/Cedar Ravine Rd[1]	All Way Stop	E/38	F/73	F/68	F/88
5. Pacific St/Cedar Ravine Rd	Signal	D/47	F/84	D/46	E/76

TABLE 4.10.5 INTERSECTION OPERATIONS – CUMULATIVE CONDITIONS					
		NO PROJECT		PROPOSED PROJECT	
INTERSECTION	CONTROL	AM	PM	AM	PM

Source: Fehr & Peers, 2018

Notes: LOS and average intersection delay, in seconds per vehicle.

1. Intersection includes Clay Street as fourth leg in Intersection 4 under the proposed project conditions.

Under cumulative conditions, congestion on US 50 during both peak hours would create queuing on Bedford Avenue that would extend onto eastbound and westbound Main Street and to Clay Street and Cedar Ravine Road. With the forecasted growth in traffic volume, average peak hour delay would increase at all study intersections, with all intersections operating at LOS D or below during both AM and PM peak hours without implementation of the proposed project.

During the AM and PM peak hour, the four-leg Main Street/Clay Street/Cedar Ravine Road intersection would operate at LOS F and would increase the intersection delay when compared to both the Main Street/Clay Street and Main Street/Cedar Ravine Road intersections. However, the proposed project would reduce the total number of intersections operating at LOS F from five intersections under no project conditions to three intersections under the proposed project. The LOS and delay at the other study intersections would be the same or lower than cumulative no project conditions.

Signal control is assumed for the study intersections at Main Street/Bedford Avenue and Pacific Street/Cedar Ravine Road under cumulative conditions. Traffic signal installation at Main Street/Bedford Avenue and Pacific Street/Cedar Ravine Road is not currently programmed in the City's Capital Improvement Program (CIP) or included in the City's TIM program. The City periodically updates its CIP with new projects in response to planned growth and anticipates that the identified traffic signal improvements at Main Street/Bedford Avenue and Pacific Street/Cedar Ravine Road would be candidate projects for inclusion in future CIP or TIM Fee Program updates.

Parking

EXISTING CONDITIONS

The proposed project site includes the Ivy House parking lot, which currently contains 72 parking spaces. The City currently provides leased parking spaces to businesses for employee use at the Ivy House parking lot. Of the 72 parking spaces, 37 spaces are allocated for leased parking, and there are currently 30 leased parking space permits. There is also on-street parking and two other public lots within one-quarter mile of the proposed project that includes over 80 other parking spaces. To determine the proposed project's effect on parking supply, a survey of area parking facilities was conducted in March and September 2014 within approximately one-quarter mile of the proposed project site. For the typical midweek day (Wednesday) surveyed, the Ivy

House parking lot had a maximum of 42 of the total 72 spaces occupied. All surveyed parking areas had less than 75 percent peak occupancy during the afternoon/evening period.

PROPOSED PROJECT CONDITIONS

During proposed project construction, the Ivy House parking lot would be unavailable for public use. However, the downtown area has an adequate number of existing spaces to accommodate the temporary parking demand. The City would notify businesses of a potential temporary closure and would ensure access to businesses are maintained. Project team members would conduct meetings with owners of affected businesses during the final project design phase and assess the parking needs, in order to accommodate those needs where feasible.

The proposed project would modify the Ivy House parking lot by dividing it into two new parking lots: one to the east of the realigned Clay Street and one to the west that would include the former Clay Street right-of-way. The total parking spaces provided by these two lots would be approximately 58 spots, approximately 16 fewer spaces than currently provided.

In 2015, the City acquired a parking lot on Locust Avenue adjacent to the El Dorado Trail. Although the lot is currently functioning as an informal parking area, the lot is not yet considered a designated City parking lot. The Locust Avenue lot would be improved as part of the proposed project and permanent parking spaces would be defined. This lot would provide approximately 25 spaces for public parking that is intended to offset the loss of spaces at the Ivy House parking lot. The net result of the modification to the Ivy House parking lot and the addition of the Locust Avenue parking lot would be a net gain of parking spaces.

5. CEQA-Required Topics

5.11 Environmental Effects Found to be Less than Significant

Section 15128 of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) "contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR."

The City of Placerville (City) prepared an Initial Study/Notice of Preparation (IS/NOP) and circulated it to responsible agencies, trustee agencies, local agencies, and various organizations and individuals for review and comment on August 11, 2014, and held a scoping meeting on August 27, 2014, to provide a forum for public comments on the scope of the EIR. An original Draft EIR was prepared and circulated for public review and comment between March 2, 2018 and April 18, 2018. The Recirculated EIR has been prepared, incorporating public and agency responses to the original Draft EIR. Issues that were found to have no impact or less-than-significant impacts during preparation of the IS/NOP, nor were not given a full evaluation in the original Draft EIR because they were found to be less-than-significant, do not need to be addressed further in the EIR. Based on the findings of the IS/NOP, the results of scoping, and the original Draft EIR, a determination was made that the Recirculated EIR did not need to further analyze the following:

- agriculture and forestry resources
- geology and soils
- mineral resources
- population and housing
- public services
- recreation
- utilities
- wildfire

The EIR must contain a comprehensive analysis of the remaining environmental issues identified in Appendix G of the CEQA Guidelines. After further study and environmental review in this REIR, direct and indirect impacts of the Clay Street Bridge Replacement Project (proposed project) (not including cumulative impacts) would be less than significant or could be reduced to less-than-significant levels with mitigation measures for the following issue areas:

- Aesthetics (Section 4.1)
- Air Quality (Section 4.2)
- Biological Resources (Section 4.3)
- Greenhouse Gases (Section 4.5)
- Hazards and Hazardous Material (Section 4.6)
- Hydrology and Water Quality (Section 4.7)

- Land Use Planning (Section 4.8)
- Noise and Vibration (Section 4.9)
- Transportation and Traffic (Section 4.10)

5.12 Significant Environmental Effects that Cannot be Avoided

Section 15126.2(b) of the CEQA Guidelines requires that the EIR describe any significant impacts, including those that can be mitigated but not reduced to less-than-significant levels.

After analysis and environmental review, as provided in this REIR, it was determined that project-level impacts in the following resource areas, as provided in **Table 5.12-1**, below, would be significant and unavoidable for the proposed project, even with the incorporation of reasonable and enforceable mitigation measures, which would attempt to reduce impacts. The potential environmental effects of the proposed project and the proposed mitigation measures are discussed in detail in **Chapter 4**, **Environmental Analysis**, of this EIR.

TABLE 5.12.1 SUMMARY OF SIGNIFICANT IMPACTS OF THE PROJECT

RESOURCE	PROJECT IMPACTS	CUMULATIVE IMPACTS
Cultural Resources	Impacts regarding the project causing a substantial adverse change in the significance of a historical resource were determined to be **potentially significant** without mitigation. Therefore, mitigation measures were required or included. Removal of the existing Clay Street Bridge and moving the Druid Monument to a new location would still result in a **significant and unavoidable impact** under CEQA because the physical characteristics of the bridge and monument that convey its historical significance and that justify its eligibility for inclusion in the NRHP and/or CRHR would be materially altered.	The removal, modification or movement of the bridge, monument, retaining walls, and former Lincoln Highway segment, as contributors to the assumed-eligible Placerville Main Street Historic District is not substantial nor predominant when viewed in the overall context of the assumed-eligible Placerville Main Street District. As such, the overall character-defining elements of the district that contribute to the themes of transportation, settlement, architecture, commerce, government, and monuments would still be evident when the project is completed, as compared to existing conditions. Impacts regarding cumulative impacts to cultural resources were determined to be **less than cumulatively significant**.

5.13 Significant Cumulative Impacts

According to Section 15355 of the CEQA Guidelines, the term “cumulative impacts” “refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” Individual effects that may contribute to a cumulative impact may be from a single project or a number of separate projects. Individually, the impacts of a project may be relatively minor, but when considered along with impacts of other closely related or nearby projects, including newly proposed projects, the effects could be cumulatively considerable.

This Recirculated EIR has considered the potential cumulative effects of the proposed project. Cumulative projects are lists in **Table 3.6-1** and no areas have been found to be cumulatively considerable.

5.14 Growth Inducement

5.14.1 Introduction

Section 15126.2(d) of the CEQA Guidelines requires that an EIR evaluate the growth-inducing impacts of a proposed project and provides the following guidance on growth-inducing impacts: a project is identified as growth inducing if it “could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.”

Growth inducement can be a result of new development that increases residential units or businesses, removes barriers to development, or provides resources that lead to secondary growth in an area either directly or indirectly. More specifically, the development of new homes or businesses may induce population growth directly. A project would induce indirect population growth if it established substantial new permanent employment opportunities or if it involved a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand (*Napa Citizens for Honest Government v. Napa County Board of Supervisors*). Similarly, a project would indirectly induce growth if it removed an obstacle to additional growth and development, such as removing a constraint on a required public service, for example, a project providing an increased water supply in an area where water service historically limited growth could be considered growth-inducing.

Growth inducement may constitute an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Local land use plans establish land use development patterns and include growth policies that allow the orderly expansion of urban development supported by adequate urban public services, such as water supply, roadway infrastructure, sewer service, and solid waste service.

5.14.2 Environmental Setting

The City began as a gold rush community in the early years of California's history as a state. The City is now known for its agriculture, recreation, tourism, history, and lumber industry rather than for its gold. Additionally, the City is the County Seat and the center of financial, commercial, civic, and government activity for much of El Dorado County.

According to projections from the Sacramento Area Council of Governments (SACOG), Growth projections through 2040 reflect continued infill of the city's vacant and underutilized parcels. Approximately 480 new housing units and 520 new jobs are projected by 2040. The city's strong jobs/housing ratio of 2.1 currently is expected to decrease slightly to 2.0 by 2040. Existing general plan capacities allow for an additional 2,000 new employees and 630 new homes post 2040 (SACOG 2020).

5.14.3 Analysis

The proposed project would require a peak construction workforce of up to 45 workers, which represents a minimal increase in employment over the construction period given the existing population in the City and surrounding area. Construction workers are expected to travel to the project site from various locations throughout the Sierra Nevada mountain range foothills and the greater Sacramento area. Given that construction activities would occur for approximately 9 to 12 months, and because of the large workforce in the Sierra Nevada mountain range foothills and the greater Sacramento area, it is not anticipated that construction workers would relocate to the City as a result of proposed project construction. Therefore, construction of the proposed project would not induce growth. Upon construction completion, no new employment opportunities would be available, and employment opportunities would be similar to existing conditions.

The proposed project would replace the existing one-lane Clay Street Bridge with a new two-lane bridge, requiring the realignment of Clay Street to form a new four-way intersection with Main Street and Cedar Ravine Road. The existing bridge currently accommodates two-way traffic as Clay Street is a two-lane roadway north and south of the bridge. Thus, the replacement of the bridge is not capacity increasing. The proposed project would provide safer vehicle, pedestrian, and bicycle travel compared to existing conditions.

The restriping of turn lanes at the Main Street/Cedar Ravine Road intersection with the realignment of Clay Street would provide for safe vehicle turning movements and pedestrian access in the area. It would not increase roadway volume capacity on Clay Street, Main Street, or Cedar Ravine Road. Thus, the proposed project would not be growth-inducing.

The proposed project does not include the construction of new residential units or businesses that would attract additional population to the City. No changes in land use designations or zoning would occur as a result of the proposed project that would change the type or intensity of development which could induce growth. The proposed

project does not include the development of new utility infrastructure or the increase in utility infrastructure capacity; therefore, the proposed project would not result in the removal of existing barriers for development. The proposed project would not result in an increase in traffic volumes that would require additional roadway capacity.

Section 3.6, Cumulative Projects, Table 3.6-1 lists cumulative projects in the General Plan area. Among those is Cottonwood Phase 4 and 6, a residential subdivision on approximately 22.2 acres north of Clay Street and east of the Cottonwood Apartments. This is an approved project for which the City adopted a Mitigated Negative Declaration that, among other items, evaluated that project's growth-inducing effects. The full buildout of Cottonwood Phase 4 and 6 will occur under existing approvals. The proposed project is necessary to accommodate traffic generated by the Cottonwood Phase 4 and 6 Project in a safe manner. The Cottonwood subdivision was required to contribute to the proposed project. As such, while the proposed project would accommodate growth commensurate with existing approved development; however, it would not increase roadway volume capacity on Clay Street, Main Street, or Cedar Ravine Road. The proposed project is not growth-inducing.

5.15 Energy Conservation

5.15.1 Introduction

The National Environmental Policy Act (NEPA) (42 United States Code [USC] Part 4332) requires the identification of all potentially significant impacts to the environment, including energy impacts.

In 1975, in response to the oil crisis of the 1970s, the California State Legislature adopted Assembly Bill (AB) 1575 which created the California Energy Commission (CEC) and amended Public Resources Code Section 21100(b)(3) to require EIRs to consider the wasteful, inefficient, and unnecessary consumption of energy caused by a project.

The California Environmental Quality Act (CEQA) Guidelines section 15126.2(b) and Appendix F, Energy Conservation, require an analysis of a project's energy use to determine if the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources.

5.15.2 Environmental Setting

The proposed project site is located south of U.S. Highway 50 (US 50), and includes the Clay Street Bridge over Hangtown Creek, the Ivy House parking lot, Clay Street, and the intersections of Main Street, Cedar Ravine Road, and Clay Street. The proposed project vicinity includes the following intersections: US 50/Bedford Avenue, Main Street/Bedford Avenue, MainStreet/Clay Street, Main Street/Cedar Ravine Road and Cedar Ravine Road/Pacific Street.

The US 50/Bedford Avenue intersection is one of three signalized intersections on US 50 in the City of Placerville. The other intersections have stop control. The Main Street/Bedford Avenue and Main Street/Cedar Ravine Road intersections have all-way stop control. The Clay Street/Main Street and Pacific Street/Main Street intersections are 2-way-stop controlled, with stop signs only on the minor street approaches (Clay Street and Pacific Street).

The proposed project site includes the Ivy House parking lot, which currently includes 72 parking spaces. There is also on-street parking and two other public lots within one-quarter mile of the proposed project that include over 80 parking spaces. The El Dorado Trail, a Class 1 separated bikeway, starts at Bedford Avenue and continues east, parallel to, and immediately south of, US 50. Existing pedestrian facilities in the proposed project area include sidewalks, crosswalks, and a pedestrian overcrossing. While the El Dorado Transit's Placerville Eastbound and Westbound routes provide hourly service weekdays 7 AM to 5 PM and the Saturday Express route provides hourly service on Saturdays from 9 AM to 5 PM through the proposed project area, no transit stops are located adjacent to the Clay Street/Main Street and Cedar Ravine Road/Main Street intersections.

Various utilities exist in the proposed project area, including sewer, water, overhead and underground electrical, overhead and underground telephone and communications, storm drains, irrigation canals, street lighting and signal equipment.

Energy use in the proposed project site and immediate vicinity include vehicles and street lighting on Main Street, Clay Street, and Cedar Ravine Road, and parking lot lighting at the Ivy House parking lot.

5.15.3 Analysis

The following thresholds are based on Appendix G of the CEQA Guidelines. An energy impact is considered significant if the proposed project would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The proposed project does not include the construction of new residential units or businesses, does not change land use designations or zoning, does not include the development of new utility infrastructure or the increase in utility infrastructure capacity, and would not result in an increase in roadway capacity. Thus, the consumption of resources such as water, electricity, and fossil fuels during the proposed project operations would be the same as existing conditions. Proposed project operations would not result in the use of energy consuming equipment,

facilities, or processes that cause wasteful, inefficient, and unnecessary consumption of energy.

Resources that would be consumed as a result of the proposed project's construction include water, electricity, and fossil fuels. Any construction activities resulting from the implementation of the proposed project would require the manufacturing of new materials, some of which would not be recyclable, and the energy required for the production of these materials would also result in energy consumption. The anticipated equipment, vehicles, and materials required for construction of the proposed project are described in **Chapter 3, Project Description**.

Construction activities associated with the proposed project would be short term and temporary, between 9 and 12 months. Construction related fuel consumption is provided in **Tale 5.15-1**.

TABLE 5.15.1 PROJECT CONSTRUCTION FUEL USE

PROJECT ACTIVITY	ESTIMATE FUEL USE[1]
Construction	85,720 gallons

Sources: The Climate Registry 2023.

1 Estimated fuel use is based on the construction greenhouse gas emissions, as discussed in Section 4.5, Greenhouse Gas Emissions.

This demand for fuel would not result in the need for new or altered facilities given the temporary nature of construction. Construction activities (i.e., extended idling, construction vehicle miles traveled) would be limited as much as possible. Construction equipment and vehicles would be properly tuned and maintained. In addition, the contractors would use low-sulfur fuel in all construction equipment as provided in California Code of Regulations (CCR) Title 17, Section 93114 (refer to **Section 4.2, Air Quality**, for further details). In addition, routing and scheduling construction traffic to avoid peak travel times would reduce congestion and conserve fuel consumption caused by idling vehicles along roads. Therefore, compliance with all applicable building codes, BMPs and mitigation measures identified in this EIR, would conserve energy and reduce that used of natural resources.

The resources that would be consumed as a result of proposed project operations include water, electricity, and fossil fuels during operation. The amount and rate of consumption of these resources during the operation of the proposed project would be similar to existing conditions. The proposed project would reduce the average delay per vehicle and the length of vehicle idling time at the proposed project intersections. This reduces idling emissions compared to the no project option, allowing vehicles to be more fuel efficient when traveling through the proposed project site (see **Section 4.2, Air Quality**). Energy use related to street and parking lot lighting would be similar to existing conditions. Furthermore, any new lighting would assist in wayfinding and increase safety, which would not be considered wasteful or unnecessary. Therefore, the proposed project would not result in increases in inefficiencies or unnecessary

energy consumption as a direct or indirect consequence of the proposed project, and the impact is less than significant.

The proposed project would comply with federal, State, and local regulations aimed at reducing energy consumption. Local regulations have been developed in accordance with federal and State energy regulations, such as Senate Bill (SB) 743, which is also aimed at reducing energy consumption. The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The impact would be less than significant.

Section 3.6, Cumulative Projects, Table 3.6-1 lists cumulative projects in the General Plan area. As discussed above, the proposed project impacts would result in a less than significant impact. Overall energy use for the operation of the proposed project would be similar to existing conditions. Any new lighting required for the proposed project would assist in wayfinding and increase safety, which would not be considered wasteful or unnecessary. Therefore, although the proposed project would involve the use of increased electricity and fuel during construction and operation, it is intended to improve and replace the existing infrastructure with newer, and more, features that would provide safer operations for all roadway users. The proposed project incremental contribution to cumulative energy impacts would not be cumulatively considerable.

6. Alternatives

6.1 Introduction

The California Environmental Quality Act (CEQA) requires that "an Environmental Impact Report (EIR) shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives" (State CEQA Guidelines Section 15126.6). This chapter describes all alternatives considered, compares the environmental impacts of the several alternatives carried forward for full analysis, and also explains why some additional alternatives were considered, but eliminated from further consideration (including the reasons for elimination).

The following items are key provisions of the CEQA Guidelines (Section 15126.6).

- The discussion of alternatives should focus on alternatives to the proposed project or its proposed site that are capable of avoiding or substantially lessening any significant effects of the proposed project, even if these alternatives would impede to some degree the attainment of the proposed project objectives or would be more costly.
- The No-Project Alternative should be evaluated, along with its impacts. The no-project analysis should discuss the existing conditions at the time the notice of preparation was published, as well as what would be reasonably expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a "rule of reason." Therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives should be limited to those that would avoid or substantially lessen any of the significant effects of the proposed project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the proposed project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of potentially feasible alternatives is selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in Section 15126.6(f)(1) of the CEQA Guidelines) are environmental impacts, site suitability, economic viability, social and political acceptability, technological capacity, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the project proponent

could reasonably acquire, control, or otherwise have access to alternative sites for the proposed project. If an alternative has effects that cannot be reasonably identified, if its implementation can be considered remote and speculative, and if it would not achieve the basic project objectives, it need not be considered in the EIR.
The proposed project has the potential to have significant adverse effects on Cultural Resources.

Even with the mitigation measures described in **Chapter 4**, Environmental Setting, Impacts, and Mitigation Measures, of this Recirculated EIR (REIR), impacts in these issue areas would be significant and unavoidable. Therefore, per the CEQA Guidelines, this section discusses alternatives that are capable of avoiding or substantially lessening effects on these resources. Significant and unavoidable impacts of the proposed project are summarized below.

Section 6.2 restates the project objectives and **Section 6.3** summarizes the potential significant adverse effects. **Section 6.4** presents alternatives fully analyzed in this REIR and provides a comparison of alternatives. **Section 6.5** presents alternatives to the proposed project that were considered but eliminated for further analysis. **Section 6.6** makes the required a determination about the environmentally superior alternative.

6.2 Project Objectives

As described in **Chapter 3**, **Project Description**, the following objectives have been established for the proposed project, which will aid decision makers in their review of the proposed project and its associated environmental impacts. The following are the proposed project objectives:

A. Address safety, functionality, and structural deficiencies of the necessary crossing structure over Hangtown Creek in a manner that meets modern engineering standards for bridge and road design.
B. Improve roadway public safety, traffic operations, and access by first responders.
C. Improve pedestrian and bicyclist access and safety in the project area.
D. Minimize impacts to adjacent properties.
E. Preserve and retain the existing overall historic character.

6.3 Significant Unavoidable Impacts of the Proposed Project

The technical analysis in **Sections 4.1** through **4.10** identified the following significant impact that would remain significant, and there is no feasible mitigation to reduce this impact to a less than significant level:

6.3.1 Cultural Resources

As discussed in **Section 4.4, Cultural Resources, Threshold a** (Cause a substantial adverse change in the significance of a historical resource), impacts would result from the proposed project due to the relocation of the Druid Monument. The proposed

project would affect the existing configuration of Clay Street, Main Street, and Cedar Ravine Road to create a four-way intersection. The City proposes to move the Druid Monument, currently located near the center of the intersection of Main Street and Cedar Ravine Road, up to 45 feet west of its current location to a raised concrete island between the through lane and right turn lane of eastbound Main Street. Movement of the monument from its historic location would result in a substantial adverse change to the Druid Monument as it would alter the property's historic location.

Although the proposed new location remains at the intersection of Main Street and Cedar Ravine Road and its original association with the transportation network would not change, the monument would be placed in a non-centralized location between the through lane and the right turn lane of eastbound Main Street to protect the monument from potential traffic collisions and further damage. Moving the monument from its historic location would also change the property's original intended use as a traffic calming feature, which is a character-defining element of the property.

The demolition of the deteriorating Clay Street Bridge is a significant adverse change because the physical characteristics of the historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historic Resources (CRHR) would be destroyed.

As such, the analysis presented in this REIR has determined that a significant and unavoidable impact to cultural resources has been identified for the proposed project.

6.4 Project Alternatives

A reasonable range of alternatives with the potential to attain most of the basic objectives of the proposed project but avoid or substantially lessen significant impacts is analyzed below. CEQA Guidelines Section15126.6(d) states that when evaluating alternatives, additional significant effects of an alternative shall be discussed in less detail than the significant effects of the project as proposed. The alternatives analysis below describes each alternative, analyzes the impacts of each alternative as compared to the proposed project, identifies significant impacts of the proposed project that would be avoided or lessened by each alternative, assesses each alternative's ability to meet most of the project objectives, and evaluates the comparative merits of each alternative and the proposed project.

6.4.1 Alternative 1 – No-Project/No-Build Alternative

Pursuant to CEQA Guidelines Section15126.6(e)(2), the No Project Alternative discusses the existing conditions of the project site at the time the NOP was published (August 11, 2014) as well as what would be reasonably expected to occur in the foreseeable future if the proposed project were not approved, based on current plans.

Under the No Project Alternative (Alternative 1) the proposed project would not be constructed. The project site would remain unaltered in its current condition. Under

Alternative1, the Clay Street Bridge would not be replaced, and degradation of the bridge would continue until structure failure. The intersections at Main Street, Cedar Ravine Road, and Clay Street would remain the same as existing conditions. Because of its integral construction into the southern abutment of the Clay Street Bridge, most of the Cedar Ravine culvert would remain untouched. The Druid Monument would remain in its existing location with its current exposure to traffic movements and potential culvert collapse. This alternative would not include any improvements to the project area other than routine maintenance of existing facilities based on available local funding.

The existing setting of the project site at the time the NOP was published is described as part of the existing conditions throughout this Recirculated EIR, specifically **Chapter 3, Project Description, Section 3.2.2, Environmental Setting**, and each individual **Environmental Setting subsection** within each individual technical resource in **Chapter 4**. The existing condition discussed in the Recirculated EIR form the baseline of the impact assessment of the proposed project.

6.4.1.1 Impacts

AESTHETICS

In contrast to the proposed project, under the No-Project/No-Build Alternative the project site would remain operating with the existing bridge, retaining the current visual character. The Main Street/Clay Street and Main Street/Cedar Ravine Road intersections would remain unchanged. Therefore, Alternative 1 would have no changes to the existing views of the project site. No new lighting would be installed on-site. The bridge would continue to age, naturally deteriorate and eventually fail, causing a Thus, Alternative 1 would have some impacts to aesthetics.

AIR QUALITY

Under the No-Project/No-Build Alternative, short-term construction emissions would not be generated and would not violate air quality standards. Operational emissions would remain the same as under existing conditions because the existing bridge and intersections would increase with population and job growth in the City would not be altered; however, idling time at some of the intersections, and thus increase air quality emissions above those of the proposed project. Therefore, Alternative 1 would have greater operational and operational cumulative air quality impacts when compared to the proposed project.

BIOLOGICAL RESOURCES

Under Alternative 1, there would be no potential for disturbance of sensitive or endangered species because no construction or operational activities would occur beyond activities that currently exist in association with the existing bridge and roadways. Therefore, there would be no impacts on biological resources under this alternative.

CULTURAL RESOURCES

Under the No Project/No-Build Alternative, there would be no potential for disturbance or damage to cultural resources (historic, archaeological, or paleontological) at or near the project site, as existing conditions and activities would remain the same. Therefore, there would be no impact as a result of this alternative.

GREENHOUSE GAS EMISSIONS

The No-Project/No-Build Alternative would not involve construction activities or operation of a new bridge structure and roadway; therefore, no additional trips would be associated with this alternative. Construction emissions that contribute to GHGs would be eliminated as a result of Alternative 1. Existing operational emissions would remain the same for the existing bridge and roadways; however, increase idling time would increase, and thus increase GHG emissions above those of the proposed project, and thus increase GHG emissions above the proposed project. Alternative 1 would have greater operational and cumulative operational impacts at three of the five intersections modeled, when compared to the proposed project.

HAZARDS AND HAZARDOUS MATERIALS

Under the No-Project/No-Build Alternative, the project site would remain under current Clay Street, Main Street, and Cedar Ravine Road operational activities. No construction or additional operational activities would occur. No new hazardous materials would be introduced to the project site; therefore, no impacts related to hazards or hazardous materials would occur. Alternative 1 would continue to impact to emergency response times, because Alternative 1 would not improve traffic congesting conditions.

HYDROLOGY AND WATER QUALITY

Under the No-Project/No-Build Alternative, no construction would occur and there would be no changes to the existing roadways and parking lot. Therefore, drainage patterns on the project site would not be altered and there would be no waste discharge. Absent any construction or changes to operations under this alternative, there would be no possibility of depleting groundwater supplies or interfering substantially with groundwater recharge. Therefore, no impacts related to hydrology and water quality would occur.

LAND USE AND PLANNING

Alternative 1 would be consistent with the City zoning and general plan land use designations for the project site and the surrounding area. However, Clay Street Bridge would remain with sub-standard facilities for bicycles and pedestrians, which is not completely consistent with all City's General Plan policies.

NOISE

Under the No-Project/No-Build Alternative, no construction would take place and there would be no changes to noise sources. Consequently, there would be no impacts from noise-related effects in the proposed project area.

TRANSPORTATION AND TRAFFIC

There would be no effect on existing traffic conditions under Alternative 1. There would be no impact due to construction vehicles nor any improvement in pedestrian or bicycle mobility in the area.

Over time the bridge would continue to deteriorate, possibly to the point where it would become unsafe for vehicle and pedestrian use. This deterioration could lead to the need to close Clay Street Bridge and change traffic patterns, resulting in greater impacts as compared to the proposed project.

Alternative 1 would have the same VMT as the proposed project, since, the proposed project is considered a safety improvement project that would not increase roadway capacity in the proposed project area, nor increase VMT. Additionally, Alternative 1 would not provide ADA-compliant pedestrian crosswalks at the Main Street/Clay Street/Cedar Ravine Road intersection, new ADA-compliant pedestrian facilities along Clay Street and the bridge, or Class 3 on-street bicycle facilities on Clay Street. The lack of safe pedestrian and bicycle facilities would not encourage multimodal transportation that could encourage VMT reduction.

The Druid Monument would remain at its current location in the intersection. Large vehicles, such as delivery trucks and emergency vehicles (traveling to and from Marshall Hospital, which is located just south of the intersection on Cedar Ravine Road) would continue to have the most risk of accidently of striking the Druid Monument.

No improvements would be made to Main Street, Clay Street, or Cedar Ravine Road; the area intersections would function at the same level. Therefore, the safety hazards associated with the Druid Monument placement, intersection spacing, lack of ADA-compliant facilities and designated Class 3 on-street bicycle facilities would remain. Thus, this alternative would have increase impacts as compared to the proposed project.

6.4.1.2 Conclusions

This alternative would avoid significant impacts to cultural resources and would avoid most of the impacts associated with the proposed project. Air Quality and GHG emissions would be more severe than those of the proposed project due to increased idling time. Because the Clay Street Bridge would continue to have sub-standard facilities for bicycles and pedestrians, and would continue to deteriorate, the consequences of this deterioration could result in a greater impact to transportation and traffic than the proposed project. In addition, the Druid Monument remaining in its

current alignment would continue to provide unsafe turning movements for larger vehicles. This alternative would achieve two of the project objectives (D&E); however, Alternative 1 would not achieve the three objectives related to safety, as follows:

- Address safety, functionally and structural deficiencies of the necessary crossing structure over Hangtown Creek.
- Improve roadway public safety and traffic operations.
- Improve pedestrian and bicyclist public safety.

6.4.2 Alternative 2 - Clay Street Bridge Replacement/No Clay Street Realignment

Under Alternative 2, the Clay Street Bridge Replacement/No Clay Street Realignment with Cedar Ravine Road Alternative, the existing Clay Street Bridge would be demolished, and a new two-lane bridge would be constructed along its existing alignment. For a two-lane bridge, applicable engineering standards (American Association of State Highway and Transportation Officials [AASHTO]) require minimum 11-foot lanes in each travel direction, plus a minimal shoulder, and curbs, gutters, and sidewalks. Meeting these requirements, the minimum width of the roadway would be 28 feet between curbs (11-foot lanes and 3-foot shoulders) and a 6-foot sidewalk on each side, excluding the bridge railings, for a total minimum bridge width of 44 feet. Clay Street would not be realigned to create the four-way intersection with Main Street and Cedar Ravine Road, and the Ivy House parking lot would not be reconfigured to accommodate the realignment.

6.4.2.1 Impacts

AESTHETICS

Alternative 2 would have similar aesthetic impacts as the proposed project when compared to the portion of the proposed project that would replace the bridge. Mitigation measures would be similar to those identified for the bridge replacement portion of the proposed project. No other changes to the visual environment would occur. Overall, this alternative would have fewer impacts when compared to the proposed project.

AIR QUALITY

Under Alternative 2, construction activities would only be required for the replacement of the Clay Street Bridge. The construction area would be smaller as compared to the proposed project, and only construction equipment needed for the bridge replacements would be necessary. Thus, while Alternative 2 would also have construction air emissions, they would be reduced as compared to the proposed project. No changes to air emissions would occur beyond what currently exists for roadway and parking operations. Operational emissions would remain the same as under existing conditions because the intersections would not be altered; however, idling time would continue to increase, and thus increase air quality emissions above

the proposed project. Therefore, Alternative 2 would have greater operational and operational cumulative impacts when compared to the proposed project.

BIOLOGICAL RESOURCES

Alternative 2 would have similar biological impacts as the proposed project when comparing to the portion of the proposed project that would replace the bridge. Alternative 2 would require mitigation measures similar to those identified for the proposed project. No other changes to biological resources would occur, once the bridge is replaced. Overall, this alternative would have similar impacts when compared to the proposed project.

CULTURAL RESOURCES

Under Alternative 2, the Clay Street Bridge would continue to be replaced; however, the Druid Monument would remain in its existing location. Therefore, while impacts would continue to be significant and unavoidable regarding the Clay Street Bridge; under Alternative 2, there would be no impact to the Druid Monument. Alternative 2 would continue to require mitigation measures similar to the proposed project regarding the bridge. While Alternative 2 would continue to have a significant and unavoidable impacts regarding the Clay Street Bridge, it would avoid a significant and unavoidable impact to the Druid Monument and would have no impact on the assumed-eligible Placerville Main Street District (and draft Downtown Placerville Historic District). Therefore, the overall impact to cultural resources would be reduced with Alternative 2 as compared to the proposed project.

GREENHOUSE GAS EMISSIONS

Under Alternative 2, construction activities would only be required for the replacement of the Clay Street Bridge. The construction area would be smaller as compared to the proposed project, and only construction equipment needed for the bridge replacements would be necessary. Thus, while Alternative 2 would also have construction greenhouse gas (GHG) emissions, they would be reduced as compared to the proposed project. No changes to GHG emissions would occur beyond what currently exists for roadway and parking operations. Operational emissions would remain the same as under existing conditions because the intersections would not be altered; however, idling time would continue to increase, and thus increase GHG emissions above the proposed project. Alternative 2 would have greater operational and operational cumulative impacts at three of the five intersections modeled, when compared to the proposed project. Thus, the Alternative 2 would have greater GHG emissions impacts overall when compared to the proposed project.

HAZARDS AND HAZARDOUS MATERIALS

Alternative 2 would have similar construction impacts as the proposed project, with respect to hazards and hazardous materials. Alternative 2 would require construction mitigation similar to the proposed project. With respect to the Ivy House parking lot, Alternative 2 would continue to have potential disturbance of hazardous materials,

because roadways conform work would abut Ivy House parking lot and hazardous contamination is not defined. Alternative 2 would increase impacts to emergency response times, because Alternative 2 would not improve traffic congesting conditions.

HYDROLOGY AND WATER QUALITY

Alternative 2 would have similar construction impacts as the proposed project, with respect to hydrology and water quality. Alternative 2 would require construction mitigation similar to the proposed project. Drainage of the project site would be the same as existing conditions for the roadways and parking lot. The replacement bridge would maintain similar drainage patterns to existing conditions. Alternative 2 would decrease impacts slightly to hydrology and water quality because only the bridge would be replaced and the roadways and parking lot would have no alterations.

LAND USE AND PLANNING

Alternative 2 would be consistent with the City zoning and general plan land use designations for the project sites and the surrounding area. Under Alternative 2, property acquisition would be required on the west side of Clay Street, in order to accommodate conforming the existing sidewalks and roadway to the wider bridge. In addition, this alternative would result in the sidewalk on the northeast side of the roadway encroaching into the State right-of-way and the fill slope of US 50. Therefore, impact levels to land use and planning would be greater when compared to the proposed project.

NOISE

Under Alternative 2, construction noise would occur during the replacement of the Clay Street Bridge. The construction duration would be similar to, or slightly less than, the proposed project. Noise related construction impacts would be similar to the proposed project; however, residences would be located farther away from the construction site as compared to the proposed project, because no construction would occur on Main Street or Cedar Ravine Road. Main Street, Clay Street, Cedar Ravine Road, and the Ivy House parking lot would have similar noise levels as existing conditions. Mitigation measures for construction noise and vibration would be similar to the mitigation measures required for the proposed project. Overall, noise impacts would be reduced as compared to the proposed project.

TRANSPORTATION AND TRAFFIC

Under Alternative 2, construction of the Clay Street Bridge would have impacts similar to the proposed project and mitigation measure would be required. The intersections in the project area would operate similar to the no project scenario shown in **Table 4.10-4**. Existing safety concerns at Main Street/Clay Street and Main Street/Cedar Ravine Road would continue to exist under this alternative. No improvements would be made to Main Street, Clay Street, or Cedar Ravine Road; the area VMT would operate at the same level as the no project scenario; refer to **Table.4.10-5**. Therefore, Alternative 2 would continue to have safety hazards associated with the Druid

Monument placement and intersection spacing. Thus, this alternative would have increased impacts as compared to the proposed project.

6.4.2.2 Conclusions

This alternative would continue to have a significant impact to cultural resources (Clay Steet Bridge) but would avoid significant impacts to the other cultural resource (the Druid Monument). This alternative would reduce most of the remaining impacts associated with the proposed project because no other roadway improvements would occur beyond the replacement of the bridge and conforming the new bridge back to existing conditions along Clay Street. However, this alternative would have more severe impacts to land use and planning when compared to the proposed project, as a result of the need for property acquisitions along Clay Street. In addition, because Clay Street would remain in its existing alignment, this alternative would result in more severe impacts to air quality, greenhouse gas emissions, and transportation and traffic than the proposed project. This alternative would achieve most of the project objectives; however, Alternative 2 would only partially achieve objectives related to safety, as follows:

- Improve roadway public safety and traffic operations.
    - Alternative 2 would improve safety on the Clay Street Bridge; however, it would not improve safety and traffic operations on Main Street, Clay Street, or Cedar Ravine Road.
- Improve pedestrian and bicyclist public safety.
    - Alternative 2 would improve safety on the Clay Street Bridge; however, it would not improve safety and traffic operations on Main Street, Clay Street, or Cedar Ravine Road.

6.4.3 Alternative 3 - Clay Street Bridge Replacement with Roundabout

This Alternative includes the replacement of the existing Clay Street Bridge over Hangtown Creek, realignment of Clay Street, and the reconfiguration of the Clay Street/Cedar Ravine/Main Street intersection with the construction of a roundabout. The Clay Street Bridge Replacement with Roundabout was studied and taken through the initial analysis under the California Environmental Quality Act (CEQA) in 2010.

This Alternative would still require the replacement of the Clay Street Bridge and the relocation of the Druid Monument to be relocated to the center of the roundabout. The monument would be inaccessible to pedestrians. New signage regarding the Druid Monument would be provided in a safe location outside the roundabout for pedestrians to view.

The roundabout design option was removed as an alternative for the project on July 8, 2014 by City Council resolution. In November 2014, Placerville voters approved

Measure K that amended the City's General Plan to prohibit the construction of roundabouts within the City limits unless approved by voters.

Since the 2014 City Council Resolution and the passing of Measure K, the general attitude towards roundabouts has shifted. While Measure K continues to require the voters of Placerville to approve a roundabout, there are currently more than 20 roundabouts programmed for funding in the surrounding areas. Therefore, although procedurally challenging, local legislation and Measure K, alone, does not make this project alternative infeasible. Thus, this alternative was carried forward for full analysis and comparison to the proposed project..

6.4.3.1 Impacts

AESTHETICS

Alternative 3 would have similar aesthetic impacts as the proposed project. This Alternative would install a roundabout at the Main Street/Clay Street/Cedar Ravine Road intersection. The Druid Monument would be placed in the center of the roundabout, providing a focal point in the center of the intersection. Mitigation measures for this alternative would be similar to those identified for the proposed project. Overall, this alternative would have similar impacts to aesthetics when compared to the proposed project.

AIR QUALITY

Under Alternative 3, construction activities would be similar to the proposed project. Thus, while Alternative 3 would have construction air emissions similar to those of the proposed project. This alternative would improve movement through the proposed Main Street/Clay Street/Cedar Ravine Road intersection when compared with the proposed project, because traffic is anticipated to move continually through the roundabout, thus minimizing idling time. Therefore, operational air emissions from Alternative 3 would be reduced when compared to the proposed project.

BIOLOGICAL RESOURCES

Alternative 3 would have similar biological construction and operation impacts when comparing to the proposed project. Alternative 3 would require mitigation measures similar to those identified for the proposed project.

CULTURAL RESOURCES

Construction and operation of Alternative 3 would have similar impacts to cultural resources as the proposed project. Mitigation measures similar to those identified for the proposed project would be required for Alternative 3. The Druid Monument would be shifted slightly to be centered within the roundabout. The original placement of the monument was carefully selected by the then Board of Trustees of the City of Placerville (now referred to as the Placerville City Council) and the Druids. Its original placement in the center of an intersection gave it enhanced visibility and prominence. While the Druid Monument location would be shifted slightly under Alternative 3, it would remain within the intersection with traffic circulating around it, similar to the existing conditions and similar to the original placement of the monument by the City.

As specified in 36 CFR 800.5 (a) (2) (iv), this slightly shift is considered a less than significant impact because the new location maintains the character defining feature of keeping the monument in a centralized location. Thus, this alternative would be more consistent with the character-defining elements that contribute to the themes of transportation, settlement, architecture, commerce, government, and monuments in the assumed-eligible Placerville Main Street District (and draft Downtown Placerville Historic District) would occur. Therefore, while Alternative 3 would continue to have a significant and unavoidable impacts regarding the Clay Street Bridge, it would avoid a significant and unavoidable impact to the Druid Monument. Overall, Alternative 3's impact on cultural resources would be reduced compared to the proposed project.

GREENHOUSE GAS EMISSIONS

Under Alternative 3, construction activities would be similar to the proposed project. Thus, while Alternative 3 would have construction GHG emissions similar to those of the proposed project, this alternative would improve movement through the proposed Main Street/Clay Street/Cedar Ravine Road intersection when compared with the proposed project, because traffic is anticipated to move continually through the roundabout, thus minimizing idling time. Therefore, operational GHG emissions from Alternative 3 would be reduced when compared to the proposed project.

HAZARDS AND HAZARDOUS MATERIALS

Under Alternative 3, impacts related to hazards and hazardous materials would remain similar to those identified for the proposed project. Mitigation measures would be required for Alternative 3; these mitigation measures would be similar to those identified for the proposed project. Regarding emergency response times, because idling and delays through the Main Street/Clay Street/Cedar Ravine Road intersection would be less than the proposed project, the emergency response times through the project area would be improved as a result of the roundabout.

HYDROLOGY AND WATER QUALITY

Under Alternative 3, construction and operation impacts related to hydrology and water quality would remain similar to those identified for the proposed project. Implementation of best management practices (BMPs), permits and low impact design (LID) would be required for Alternative 3; these mitigation measures would be similar to those identified for the proposed project.

LAND USE AND PLANNING

Alternative 3 would be consistent with the City zoning and general plan land use designations for the project sites and the surrounding area. Construction and operations would be similar to the proposed project; therefore, Alternative 3 would have similar impacts when compared to the proposed project.

NOISE

Under Alternative 3, the construction activities, equipment, and duration would be similar to the proposed project. Noise related construction impacts would be similar to the proposed project. Mitigation measures for construction noise and vibration would be similar to the mitigation measures required for the proposed project. Alternative 3

would have similar impacts to operational and cumulative noise as compared to the proposed project.

TRANSPORTATION AND TRAFFIC

Under Alternative 3, construction impacts would be similar when compared to the proposed project; mitigation would continue to be required. This alternative's VMT would be the same as compared to the proposed project because no additional roadway capacity would be added. Safety improvements from this alternative would be similar to the proposed project. Alternative 3 would have similar impacts to operational and cumulative traffic and transportation affects as compared to the proposed project.

6.4.3.2 Conclusions

This alternative would continue to have a significant impact to one cultural resource (Clay Street Bridge) but would avoid significant impacts to the other cultural resource (the Druid Monument). This alternative would maintain or reduce most of the remaining impacts associated with the proposed project. This alternative would achieve all of the project objectives.

6.5 Alternative Considered but Eliminated from Further Analysis

Alternatives may be eliminated from detailed consideration in an EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid or substantially reduce any significant environmental effects (CEQA Guidelines, Section 15126.6[c]). Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, also do not need to be considered (CEQA Guidelines, Section 15126[f][2]). Per CEQA, the lead agency may make an initial determination as to which alternatives are feasible and warrant further consideration, and which are infeasible. The following alternatives were initially considered but were eliminated from further consideration in this Recirculated EIR because they did not meet project objectives or were infeasible.

6.5.1 Construct New Clay Street Bridge Parallel to Existing Bridge with Clay Street Realignment

This alternative would involve constructing a second bridge across Hangtown Creek and realigning Clay Street. The new bridge would be a two-lane facility, with the existing bridge retained as a pedestrian/bicycle bridge. While this alternative would meet project objectives, it could result in a greater aesthetics impact than the proposed project because it would create an additional feature across Hangtown Creek that, when combined with the existing bridge, would increase the overall scale of the crossing and its visibility. This may be perceived as more visually intrusive than a new replacement bridge.

This alternative would implement the same improvements as the proposed project, including a new two-lane bridge facility with intersection realignment. This alternative

would still include realignment of the Main Street/Clay Street/Cedar Ravine Road/ intersection and would continue to require the relocation of the Druid monument and would result in the same cumulative traffic impacts. Thus, this alternative was eliminated from further consideration because:

- It would result in additional/greater aesthetic resources impacts compared to the proposed project
- It would not substantially reduce the significant impacts associated with cultural resources or transportation and traffic (cumulative).

6.5.2 Clay Street Bridge Rehabilitation

This alternative would involve rehabilitating and widening the existing bridge in order to accommodate the two-lane local roadway, sidewalks, and bridge the existing bridge up to current safety standards. This would result in multiple costly design changes to a bridge that is almost 100 years old and has reached the end of its service life.

AASHTO LRFD Bridge Design Specs Section 1.2 defines “design life” of a bridge as 75 years; therefore, the existing Clay Street Bridge has reached the end of its service life. The existing bridge would need to be widened by 25 feet to meet minimum AASHTO standards for a two-lane local road. The widening would include adding concrete sidewalks and crash-tested concrete barriers. The superstructure and the foundations of the existing bridge would need to be widened to accommodate the extra bridge deck width and additional roadway loading.

Additionally, Caltrans Memorandum to Designers 9-3 provides the following guidelines for widening existing bridges: “Whenever possible, every effort should be made to widen an existing structure with the same structure type.” Earthen filled concrete arch bridges are no longer used in modern day (current) bridge designs as they are not a cost-effective choice for a bridge type due to the larger dead loads, restricted span lengths, and increase in materials needed to construct the bridge type. Another common problem with the earth filled arch is the entrapment of rainwater in the earth fill, which in time can deteriorate the concrete walls via freeze/thaw action and rust the reinforcing steel. For this reason, widening the existing Clay Street Bridge with the same structure type would not be an economically feasible solution. A more appropriate structure type for the widening would be a reinforced concrete slab type bridge; this bridge type is lighter, requires less material, and is easier and cheaper to construct. Widening the bridge with this structure type would drastically change the character and appearance of the existing bridge.

In order to widen the existing bridge, it would first need to be confirmed that the components of the existing bridge are in good enough condition to accommodate the modifications. This includes confirming the compressive strength of the concrete and determining the amount of steel reinforcing within the bridge (no as-built plans are available).

In June of 2023, the City conducted supplemental testing to further determine the bridge's structural integrity. Ground Penetrating Radar (GPR), Schmidt Hammer Testing, core drilling, and visual observations were made to assesses concrete strength, reinforcement spacing, and structural fill integrity (Youngdahl 2023). Reinforcement size and spacing information was documented and indicated and areas where rebar is and is not present were noted. Using Schmidt Hammer Testing, core samples were taken to verify concrete strength of the bridge, which ranged from 2,750 psi to 5,600 pounds per square inch (psi). Minimum design strength for structural concrete for current standards is 3,600 psi. The sidewalk at the bridge deck was also cored to verify fill material, which is considered a structural component of the bridge. The earthen fill material was noted as moist and comprised of decomposed slate with pieces of wood (organic materials) and was not well compacted, which confirms that it was not providing any structural strength to the bridge (**Appendix C)**. As such, it is anticipated that rehabilitating and widening the existing Clay Street Bridge would not be a viable technological or economically feasible solution for this project.

Although this alternative would keep the Druid Monument in place (avoiding adverse impacts to cultural resources), this alternative was eliminated from further consideration because:

- It would not be feasible based on sound engineering judgment.

6.5.3 Clay Street Bridge Rehabilitation and Reclassification

During the cultural resources analysis, one public commenter provided an avoidance alternative that, according to the comment, would "improve the current bridge and surrounding traffic/transportation features in a way that protects historic resources [and] enhances the experience of these resources."

The elements of this alternative, as proposed by the commenter, were to:

- Rehabilitate rather than replace Clay Street Bridge;
- Retain Clay Street as a residential road, not a minor arterial;
- Clay Street became one-way to southbound traffic after El Dorado Trail with a right turn only onto Main Street;
- Parking Lot would be signed "Entry Only/No Thru Traffic" from Main Street onto Clay Street;
- Resurface Clay Street and Ivy House Parking Lot; and
- Druid Monument Exhibit/Viewing Area would be placed across from Monument within Ivy House Parking Lot.

This alternative does not meet the project objectives of:

- Addressing the functionally and structural deficiencies of the necessary crossing structure over Hangtown Creek;
- Improving roadway traffic operations; and

- Retaining the existing overall historic character.

Changing Clay Street from a two-way street to a one-way street would require a more extensive traffic analysis of a larger area to determine the impacts to traffic patterns of the surrounding roads and intersections. Furthermore, this option is not supported by first responders or the Greater Placerville Wildfire Evacuation Preparedness, Community Safety, and Resiliency Plan currently under development by El Dorado County Transportation Commission (EDCTC). Restricting southbound traffic on Clay Street to right-turn only would require a more extensive traffic analysis to determine the impacts to traffic patterns of the surrounding roads and intersections. The level of traffic analysis required is beyond the scope of this bridge replacement project.

If Clay Street was changed to a one-way street at the bridge, restoring the bridge would involve removing the existing concrete barriers and replacing them with new barriers to meet current crash-tested standards. The existing bridge superstructure would need to be modified and bolstered in order to accommodate the wider, heavier barriers and larger vehicular impact forces. These revisions would alter the appearance of the bridge. The existing bridge would also need to be widened to accommodate the standard 6-foot sidewalks necessary to provide safe pedestrian travel across the bridge. Widening the existing bridge with the same structure type (earth filled arch) would be impractical and costly (as outlined in the **Section 6.5.2, Clay Street Bridge Rehabilitation**). In addition, a cantilevered type of slab overhang would likely be the most cost-effective way of widening the bridge. This would significantly alter the appearance of the bridge and undermine the historic integrity that is trying to be preserved with this alternative.

Core samples of the concrete of the existing bridge would need to be taken and analyzed to determine if the concrete had enough strength to accommodate the attachment of additional concrete, sidewalk, and barrier. If it was found to have inadequate capacity, the unsound concrete would need to be removed and replaced. The structure would need to be analyzed to determine if the existing foundations had enough reserve capacity to accommodate the added loads from the sidewalk, heavier barriers, and additional concrete. If the existing foundations were found to be inadequate, they would need to be widened. Widening the existing foundations would alter the appearance of the existing bridge and undermine the historic integrity that this alternative is trying to preserve.

Although this alternative would retain the existing Clay Street Bridge and would keep the Druid Monument in place (avoiding adverse impacts to cultural resources), this alternative was eliminated from further consideration because:

- It would not be feasible based on sound engineering judgment.
- It would not meet three of the project objectives, as listed above.

6.5.4 Closing the Ivy House Parking Lot and Clay Street to Vehicle Traffic

Other alternatives suggested by public commenters included closing the Ivy House parking lot and closing Clay Street to vehicle traffic. This would not meet any of the project objectives. This would keep the Druid Monument in place (avoiding adverse impacts to cultural resources). This alternative, however, could result in additional impacts as compared to the proposed project, because of the removal of available parking in the downtown Placerville area, as well as the reconfiguration of traffic patterns in the City. This could result in an increase in impact severity regarding air quality, greenhouse gas emission, transportation and traffic, and land use and planning (specifically urban decay concerns regarding parking in the downtown Placerville vicinity). Thus, this alternative was eliminated from further consideration because:

- It would not meet any of the project objectives, as listed above.
- It could result in additional/greater impacts to air quality, greenhouse gas emission, transportation and traffic, and land use and planning (specifically urban decay) as compared to the proposed project.

6.6 Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative to the project from among the range of reasonable alternatives that are evaluated. Based on the summary of information presented in **Table 6.6-1**, the environmentally superior alternative is Alternative 1: No Project Alternative. Because Alternative 1 would leave the project site essentially unchanged and would not have the operational effects that would be associated with any of the alternatives, this alternative has fewer unavoidable significant impacts than the proposed project or any of the other alternatives.

However, Section 15126.6 (e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states that if the environmentally superior alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Although Alternative 1 is the environmentally superior alternative, it is not capable of meeting most of the basic objectives of the project.

Alternative 3 reduces the significant and unavoidable impacts of the proposed project for the Druid Monument. This alternative would continue to have a significant and unavoidable cultural resources impact related to the Clay Street Bridge. Alternative 3 would reduce impacts to air quality, cultural resources, greenhouse gas emission, hazards (emergency response), and transportation and traffic. Alternative 3 has fewer and less severe impacts compared to Alternative 2. As described above, Alternative 3 would achieve all of the project's objectives. Therefore, Alternative 3, Clay Street

Replacement with Roundabout, is deemed to be the environmentally superior alternative.

TABLE 6.6.1 COMPARISON OF PROJECT ALTERNATIVES				
EIR CHAPTER	PROPOSED PROJECT – LEVEL OF IMPACT AFTER MITIGATION	ALTERNATIVE 1 – NO PROJECT	ALTERNATIVE 2 –REPLACEMENT WITH NO INTERSECTION REALIGNMENT	ALTERNATIVE 3 – REPLACEMENT WITH ROUNDABOUT
Aesthetics	Less than significant	Less Severe	Less Severe	Similar
Air Quality	Less than significant	More Severe	More Severe	Less Severe
Biological Resources	Less than significant with mitigation	Less Severe	Similar	Similar
Cultural Resources	Significant and unavoidable	Less Severe	Less Severe	Less Severe
Greenhouse Gas Emissions	Less than significant	More Severe	More Severe	Less Severe
Hazardous Materials	Less than significant with mitigation	Less Severe	Similar (Hazardous Materials) More Severe (Emergency Response)	Similar (Hazardous Materials) Less Severe (Emergency Response)
Hydrology and Water Quality	Less than significant	Less Severe	Less Severe	Similar
Land Use	Less than significant	More Severe	More Severe	Similar
Noise	Less than significant	Less Severe	Less Severe	Similar
Transportation and Traffic	Significant and unavoidable (cumulative)	More Severe	More Severe	Similar
Attainment of Project Objectives	Yes	Some	Some	Yes

TABLE 6.6.1 COMPARISON OF PROJECT ALTERNATIVES				
EIR CHAPTER	PROPOSED PROJECT – LEVEL OF IMPACT AFTER MITIGATION	ALTERNATIVE 1 – NO PROJECT	ALTERNATIVE 2 –REPLACEMENT WITH NO INTERSECTION REALIGNMENT	ALTERNATIVE 3 – REPLACEMENT WITH ROUNDABOUT
Avoid Significant and Unavoidable Cultural Resources (Druid Monument)?		Yes	Yes	Yes
Avoid Significant and Unavoidable Cultural Resources (Clay Street Bridge)?		Yes	No	No

7. Responses to Comments

7.1 Introduction

The comment letters received on the Recirculated Draft Environmental Impact Report (REIR) are addressed in their entirety in this section. Each comment contained in each letter has been assigned a reference number. The responses to reference-numbered comments follow each letter. Comments from agencies or organizations have been assigned an "A" in the reference codes associated with their comments (i.e., State Agency Letter 1, Comment 1 would be SA1-1). Comments from individuals simply follow numerical order (i.e., Comment Letter LR6, Comment 1 would be LR6-1). For each issue area where multiple comments were received, a global response is provided below (Subsection 7.3.1). A copy of each comment letter or email and responses to the comments are provided below (Section 7.3).

7.1.1 Purpose

As defined by Section 15050 of the California Environmental Quality Act (CEQA) Guidelines, the City of Placerville (City) is serving as the Lead Agency for the preparation of the Environmental Impact Report (EIR) for the Clay Street Bridge Replacement Project (proposed project). The Final EIR presents the environmental information and analyses that have been prepared for the proposed project, including the REIR, comments received addressing the adequacy of the REIR, responses to comments, and clarification, corrections, or minor revisions to the REIR. The Final EIR, which includes the responses to comments, the REIR, and the Mitigation Monitoring and Reporting Program (MMRP), will be used by the City Council in the decision-making process for the proposed project.

7.1.2 Environmental Review Process

A Notice of Preparation (NOP)/Initial Study (IS) (State Clearinghouse Number 2014082024) was circulated for a 30-day public review period beginning on August 11, 2014, and held a scoping meeting on August 27, 2014. The City published the Clay Street Hangtown Creek Bridge Replacement Project Draft Environmental Impact Report (original Draft EIR) on March 2, 2018 for a 45-day public review period ending April 18, 2018. Since circulation of the original Draft EIR, The City, as Lead Agency, determined that based upon the NOP/IS and public response to the original Draft EIR, an REIR was the appropriate environmental analysis document pursuant to CEQA for the project. The REIR also satisfies the requirements of a Peremptory Writ of Mandate (Writ) issued by the El Dorado County Superior Court in February 2012 for the Mitigated Negative Declaration (MND) for the Clay Street/Cedar Ravine Realignment and Clay Street Bridge at Hangtown Creek Replacement Project (El Dorado County Superior Court 2012). The City prepared the REIR to provide the public, along with responsible and trustee agencies, and the City's decision-makers information about the potential environmental effects of the proposed project (REIR, Section 2.1).

Pursuant to CEQA Guidelines Section 15088.5, when an EIR is substantially revised and the entire EIR is recirculated for public review, the lead agency may require reviewers to submit new comments on the REIR and the lead agency need not provide written responses to comments submitted during the original Draft EIR circulation period. Per CEQA Guidelines Section 15204, reviewers of the REIR were requested to focus on the sufficiency of the REIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the proposed project might be avoided or mitigated. Although comments received on the original Draft EIR remain part of the administrative record, the REIR constitutes the document presented for public review. The City acknowledges the contributions that the participants in the public comment process have made to date to refine the analysis for the REIR.

The REIR was circulated to the public on January 26, 2024 for a 45-day public review period ending March 12, 2024. A total of 11 letters, 1 agency letter and 9 emails were received on the REIR. A list of agencies and interested parties who have commented on the REIR is provided below. Section 15088 of the CEQA Guidelines requires that the City, as lead agency, evaluate comments on environmental topics received from persons and agencies that reviewed the REIR and prepare a written response to the comments received. The response to comments contained in this document is considered Chapter 7 of the REIR.

7.2 Revisions to the REIR

The revisions that follow were made to the text of the REIR. The revised REIR has been prepared as a clean, revised document. Changes since publication of the REIR have been incorporated directly in the text rather than identified with strikeout, underline, track changes, or other markups. This approach improves readability accessibility, including compatibility with screen-reading software and other assistive technologies.

The absence of visible markup should not be interpreted to mean that a section has not been revised. Instead, reviewers should rely on the Summary of Revisions and the Responses to Comments to identify modifications to the REIR. Together, the Summary of Revisions and the Responses to Comments provide a complete record of the revisions made to the REIR and the basis for those revisions, consistent with the requirements of CEQA.

Revisions reflect new information, clarifications, corrections, refinements to the analysis, and revisions resulting from responses to comments received during public review of the REIR, as applicable. All revisions are identified in the Responses to Comments and this Summary of Revisions by referencing the applicable chapter, section, and page number(s) where the revised text appears. These references allow readers to readily identify and evaluate the changes made since the circulation of the REIR.

Not all comments received during public comment period necessitated revisions to the REIR. Only comments that resulted in a change to the document will identify that a revision was made and provide the applicable chapter and section of the REIR where

the revision can be found. If not specifically indicated in the individual response, no revisions to the REIR were necessary.

The revisions, as outlined below, fall within the scope of the original proposed project analysis included in the REIR and do not result in an increase to any identified impacts or produce any new impacts. No new significant environmental impacts would result from the changes or from a new mitigation measure proposed to be implemented. Therefore, no significant revisions have been made which would require recirculation of the REIR pursuant to CEQA Guideline 15088.5 (Recirculation of an EIR Prior to Certification).

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
Detour/Road Closures: Detour signage will be installed near the construction zone to effectively redirect traffic. Potential adverse impacts to circulation and access will be avoided by maintaining as many open lanes as possible along Main Street and Cedar Ravine Road in both directions during construction.	Detour/Road Closures: Detour signage will be installed near construction zone to effectively redirect traffic. Potential adverse impacts to circulation and access will be avoided by maintaining as many open lanes as possible along Main Street and Cedar Ravine Road in both directions during construction. The detour/road closure will also consider routes for delivery trucks entering and exiting the project area in the Historic District of Placerville.	REIR page 27 Table 2.9-1; REIR Mitigation Measure TRAF-1, second bullet point. Added "The detour/road closure will also consider routes for delivery trucks entering and exiting the project area in the Historic District of Placerville."
The proposed bridge footings and new retaining wall formline, pattern, and color would mimic the existing sections of the Hangtowm Creek retaining walls, thereby, tying the new construction into the existing environment.	The proposed bridge footings and new retaining wall formline, pattern, and color would mimic the existing sections of the Hangtown Creek retaining walls, thereby, tying the new construction into the existing environment.	REIR Page 85, Key View 5 bullet point, second paragraph, second sentence. Deleted "m" from end of "Hangtowm" and added "n" to correct spelling.
Hangtown Creek does not provide suitable habitat for this species most of the year due to its ephemeral nature, lack of suitable basking structure, heavy canopy shading, lack of forage (aquatic vegetation, fish, and amphibians), and urban setting.	Hangtown Creek does not provide suitable habitat for this species most of the year due to its lack of suitable basking structure, heavy canopy shading, lack of forage (aquatic vegetation, fish, and amphibians), and urban setting.	REIR, page 124 and 125. Deleted "ephemeral nature"
Buried human remains that were not identified during field surveys could be inadvertently unearthed during excavation activities, which could result in damage to these human remains. unearthed during excavation activities, which could result in damage to these human remains.	Buried human remains that were not identified during field surveys could be inadvertently unearthed during excavation activities, which could result in damage to these human remains.	REIR Section 4.4 Cultural Resources, Section 4.4.7, Threshold C, first sentence. Deleted the repetitive "unearthed during excavation activities, which could result in damage to these human remains."
The State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boar (RWQCB) are responsible for establishing the water quality standards (objectives and beneficial uses) required by the CWA and regulating discharges to ensure compliance with the water quality standards.	The State Water Resources Control Board (SWRCB) and Regional Water Quality Control Board (RWQCB) are responsible for establishing the water quality standards (objectives and beneficial uses) required by the CWA and regulating discharges to ensure compliance with the water quality standards.	REIR, Section 4.7.3.2, under Porter-Cologne Water Quality Act, second paragraph, first sentence. Added "d" to the misspelled word "Boar"
Consulting Parties	Section 106 Consulting Parties	Chapter 8. Organizations and Persons Consulted, subheading Consulting Parties, page 38 REIR.
The proposed project is necessary to accommodate traffic generated by the Cottonwood Phase 4 and 6 Project in a safe manor.	The proposed project is necessary to accommodate traffic generated by the Cottonwood Phase 4 and 6 Project in a safe manner.	REIR, Section 5.14.3 Analysis, fifth paragraph, typo was corrected
Because the proposed project could increase the rate and/or volume of surface runoff compared to existing conditions, the project has the potential to cause or exacerbate flooding on or off site; however, the Cedar Ravine drainage culvert, which outlets into Hangtown Creek, would be relocated and reconstructed, which would ensure capacity is maintained.	Because the proposed project could increase the rate and/or volume of surface runoff compared to existing conditions, the project has the potential to cause or exacerbate flooding on or off site; however, the Cedar Ravine drainage culvert, which outlets into Hangtown Creek, would be reconstructed without reducing its existing hydraulic capacity or altering its fundamental drainage function. The existing potential for culvert surcharge and roadway flooding during major storm events is attributable to the existing culvert capacity and Hangtown Creek backwater conditions and would not be created or exacerbated by the proposed project.	REIR, Section 4.7 Hydrology and Water Quality, Threshold C discussion, second paragraph.
Mitigation Measure AES-1: The project shall incorporate the following streetscape and landscape design concepts: • Low planter walls shall be placed along the Main Street and Clay Street edges of the reconfigured Ivy House parking lot in the same style as other surrounding rock wall features and to offer informal and temporary seating opportunities.	**Mitigation Measure AES-1:** The specific aesthetic treatments, details, color pallets and material selections will be considered for the proposed project during the PS&E stage. These elements would be presented and discussed at a public meeting prior to finalization, providing the public with an opportunity to review and comment on proposed architectural treatments before they are incorporated into the final construction documents. After the meeting, the project shall incorporate the following streetscape and landscape design concepts:	REIR Table 2.9-1 page 16 and Section 4.1, under subheader Mitigation Measures

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
• Tree species as identified in Appendix A of the Main Street Streetscape Design Development Plan (incense cedar, tulip tree, valley oak, red oak, and Chinese pistache) shall be planted along Main Street in areas where ample room is supplied to define public space along the street and adjacent to parking lots to provide shade. • Accent planting in large planting beds shall be provided adjacent to the reconfigured Ivy House parking lot. • New streetlights installed as part of the project shall have period-appropriate cast iron light pole standards and must meet applicable energy standards and City lighting specifications for safety of public roadways as set forth in Chapter XII, Section B, of the City's Development Guide.	• Low planter walls shall be placed along the Main Street and Clay Street edges of the reconfigured Ivy House parking lot in the same style as other surrounding rock wall features and to offer informal and temporary seating opportunities. • Tree species as identified in Appendix A of the Main Street Streetscape Design Development Plan (incense cedar, tulip tree, valley oak, red oak, and Chinese pistache) shall be planted along Main Street in areas where ample room is supplied to define public space along the street and adjacent to parking lots to provide shade. • Accent planting in large planting beds shall be provided adjacent to the reconfigured Ivy House parking lot. • New streetlights installed as part of the project shall have light poles consistent with existing types along Main Street and must meet applicable energy standards and City lighting specifications for safety of public roadways as set forth in Chapter XII, Section B, of the City's Development Guide.	
The General Plan recognizes Hangtown Creek and historic buildings in historic downtown as scenic resources. The General Plan includes numerous policies intended to protect those resources as well as the overall visual integrity of the downtown area. The proposed project site is visually dominated by the Ivy House parking lot, Main Street, Clay Street, Cedar Ravine Road, and the intersections of Main Street/Clay Street and Main Street/Cedar Ravine Road. These features are modern, engineered, transportation-related features that are not unique or visually significant. The Druid Monument and historic buildings that abut the proposed project boundary are recognizable and important elements of the visual landscape.	The General Plan recognizes Hangtown Creek and the historic buildings within downtown Placerville as scenic resources and includes numerous policies intended to protect those resources and maintain the overall visual character of the downtown area. Within the project vicinity, the visual environment is composed of both historic and modern elements. Hangtown Creek, the Druid Monument, and the adjacent historic commercial buildings are prominent visual features that are recognizable and important elements of the visual landscape. In contrast, the project site also includes contemporary transportation infrastructure, including Main Street, Clay Street, Cedar Ravine Road, the Ivy House parking lot, and their associated intersections, which collectively define the existing transportation setting.	REIR Section 4.1, Threshold C discussion
Construction is expected to begin in 2025 or 2026 and take approximately 9 to 12 months to complete.	Construction is expected to begin Spring 2029 and take approximately 9 to 12 months to complete	REIR Section 3.4.8, first sentence.
Information in this section is based on the Hydrology/Hydraulics Report (Domenichelli 2023), Water Quality Technical Memorandum (Drake Haglan 2016), and Geotechnical Investigation (Taber 2007).	Information in this section is based on the Preliminary Hydraulic Study and Scour Analysis (Domenichelli 2025), Water Quality Technical Memorandum (Drake Haglan 2016), and Preliminary Bridge Foundation Report (HDR 2025).	REIR Section 4.7.1, last sentence.
For a 50-year storm, the model predicts the flow to increase to 381 cfs, and for a 100-year storm, 450 cfs. Roadway flooding during large storms is a result of the capacity limits of the culvert (Domenichelli 2023).	However, when flows in Hangtown Creek are high (i.e. a 50-year storm event), the culvert capacity is reduced to 269 cfs. The Cedar Ravine culvert is inadequate to convey the 50-year and 100-year event peak flows. Culvert overflow and roadway flooding during large storm events are a result of the capacity limits of the culvert (Domenichelli 2025).	REIR Section 4.7.2.2 under Cedar Ravine subheading, last sentence.
The channel bottom is approximately 10 feet below the bridge deck (Taber 2007).	The channel bottom is approximately 10 feet below the bridge deck (HDR 2025).	REIR Section 4.7.2.2 under Clay Street Bridge subheading, first paragraph, fourth sentence.
Additional drainpipes are present at random intervals along retaining structures on both sides of Hangtown Creek (Taber 2007; Domenichelli 2023).	Additional drainpipes are present at random intervals along retaining structures on both sides of Hangtown Creek (HDR 2025).	REIR Section 4.7.2.2 under Clay Street Bridge subheading, second paragraph, last sentence.
Based on the model, the existing bridge is predicted to overtop during the 100-year event. While the bridge would pass the 50-year flow, the model predicts there would be no clearance at the top soffit at the bridge arch under existing conditions (Domenichelli 2023).	Based on the model, the existing bridge is predicted to nearly overtop during both the 50-year and 100-year event with no clearance at the top soffit at the bridge arch under existing conditions (Domenichelli 2025).	REIR Section 4.7.2.2 under Clay Street Bridge subheading, third paragraph, first and second sentence, page 220.

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
Hangtown Creek has been substantially constrained through the City as a result of adjacent development and existing aboveground trunk sewer lines. As a result, there has been a long history of flood problems. Because Hangtown Creek is constrained to a small area, large storm events are amplified (Drake Haglan 2016). Data indicated that roadway flooding could occur as a results of capacity limitations of Cedar Ravine culvert. The existing bridge nearly overtop during a 100-year event and would pass the 50-year event, but there would be no clearance to the soffit (Domenichelli 2023).	Hangtown Creek has been substantially constrained through the City as a result of adjacent development and existing aboveground trunk sewer lines within the creek. As a result, there has been a long history of flood problems. Because Hangtown Creek is constrained to a small area, large storm events are amplified (Drake Haglan 2016). Data indicated that roadway flooding could occur as a result of capacity limitations of the Cedar Ravine culvert. The existing bridge nearly overtops during the 50-year and 100-year event with no clearance to the soffit (Domenichelli 2025).	REIR Section 4.7.2.3, first paragraph,.
The bridge surface and Clay Street would be widened, and the Ivy House parking lot would be extended farther north. This has the potential to increase the amount of impervious surface that would generate stormwater runoff compared to existing conditions, although the amount is not expected to be substantial. Increases in the rate or amount of stormwater runoff have the potential exceed storm drain capacity if the existing system is not sufficient or if the rate or volume of stormwater entering a natural channel raises water surface elevations. The Cedar Ravine culvert, which outlets into Hangtown Creek, would be relocated and reconstructed in conjunction with the bridge replacement, which would ensure capacity is maintained.	The bridge surface and Clay Street would be widened, and the Ivy House parking lot would be extended farther north. This has the potential to increase the amount of impervious surface that would generate stormwater runoff compared to existing conditions, although the amount is not expected to be substantial. Increases in the rate or amount of stormwater runoff have the potential exceed storm drain capacity if the existing system is not sufficient or if the rate or volume of stormwater entering a natural channel raises water surface elevations. The Cedar Ravine culvert, which outlets into Hangtown Creek, would be relocated and reconstructed in conjunction with the bridge replacement, which would allow existing capacity to be maintained.	REIR Section 4.7.5, Threshold D
No original	In 2024, Hangtown Creek with the proposed project APE was surveyed for a City separate sewer line relocation project. One bedrock milling (BRM) feature was located on a high point of a sedimentary outcrop that extended into Hangtown Creek in the APE. No associated artifacts or cultural soils were observed near or within proximity to the site.	REIR Section 4.4.4, first paragraph, second sentence, all new text added
No original	Other Archaeological Resources One bedrock milling (BRM) feature was identified during a 2024 survey for a separate City project. The BRM is located on a high point of a sedimentary outcrop. The BRM feature is located in the proposed project APE. No associated artifacts or cultural soils were observed near or within proximity to the site. The BRM is considered a unique resource because precontact resources are not ultra-common on the landscape, and this site was likely created by, and held significance to, past people, and is significant to local tribes. Demolition and construction activities from the proposed project have the potential to inadvertently affect the BRM. Because construction of the proposed project has the potential to result in the disturbance of the feature, this is a potentially significant impact.	REIR Section 4.4.7 Project Impacts, Threshold b., subsection Other Archaeological Resources, all new text added
Mitigation Measure CUL-4: The City shall implement the following measures during project construction: • A preconstruction meeting shall be conducted by a professional archaeologist meeting the qualifications outlined in the Secretary of the Interior's Professional Qualification Standards for archaeology to educate construction contractors about the potential for encountering archaeological resources and next steps if a resource is discovered. • Archaeological monitoring in the Ivy House parking lot shall be completed by a professional archaeologist meeting the qualifications outlined in the Secretary of the Interior's Professional Qualification Standards for archaeology.	**Mitigation Measure CUL-4:** The City shall implement the following measures during project construction: • A preconstruction meeting shall be conducted by a professional archaeologist meeting the qualifications outlined in the Secretary of the Interior's Professional Qualification Standards for archaeology to educate construction contractors about the potential for encountering archaeological resources and next steps if a resource is discovered. • Archaeological monitoring in the Ivy House parking lot shall be completed by a professional archaeologist meeting the qualifications outlined in the Secretary of the Interior's Professional Qualification Standards for archaeology.	REIR Section 4.4.7 Project Impacts, Threshold b., subsection Mitigation Measure CUL-4, third bullet

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
• If prehistoric or historic-period archaeological deposits are discovered during project construction activities at the Ivy House parking lot, or at any location within the project site, all work within 25 feet of the discovery shall be redirected and the archaeologist shall assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Impacts to archaeological deposits should be avoided by project activities, but if such impacts cannot be avoided, the deposits shall be evaluated for their California Register of Historical Resources (CRHR) eligibility. If the deposits are not CRHR–eligible, no further protection of the finds is necessary. If the deposits are CRHR–eligible, they shall be protected from project-related impacts or such impacts mitigated. Mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility. Public educational outreach may also be appropriate. • The City shall also ensure compliance with any additional measures that are included in the Cultural Resources Management Plan (CRMP) that is being finalized through the NEPA process for the project as it pertains to the Ivy House archaeological deposits and other locations that may be disturbed by project construction. *Timing/Implementation:* *During project construction* *Monitoring/Enforcement:* *City of Placerville Engineering Department*	• Archaeological and/or tribal monitoring will be on site during construction activities that disturb native soil within the vicinity of the BRM in Hangtown Creek. Up to two months prior, and no less than one week prior, to the start of construction activities of native soil, the City will contract with a qualified Archaeological Consultant and/or Tribal Monitor. Monitors will wear the appropriate safety equipment while on the construction site and will document field-monitoring activities on a monitoring log. The qualified archaeological monitor will be given one business day notice of the start of native soil disturbing activities. • If prehistoric or historic-period archaeological deposits are discovered during project construction activities at the Ivy House parking lot, or at any location within the project site, all work within 25 feet of the discovery shall be redirected and the archaeologist shall assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Impacts to archaeological deposits should be avoided by project activities, but if such impacts cannot be avoided, the deposits shall be evaluated for their California Register of Historical Resources (CRHR) eligibility. If the deposits are not CRHR–eligible, no further protection of the finds is necessary. If the deposits are CRHR–eligible, they shall be protected from project-related impacts or such impacts mitigated. Mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility. Public educational outreach may also be appropriate. • The City shall also ensure compliance with any additional measures that are included in the Cultural Resources Management Plan (CRMP) that is being finalized through the NEPA process for the project as it pertains to the Ivy House archaeological deposits and other locations that may be disturbed by project construction. *Timing/Implementation:* *During project construction* *Monitoring/Enforcement:* *City of Placerville Engineering Department*	
No original	**Mitigation Measure CUL-5:** For the BRM, an Environmentally Sensitive Area (ESA) will be established in consultation with the City, a Tribal Monitor, and the qualified archaeologist consultant along the north bank of Hangtown Creek and delineated on the engineering plans. The fencing will consist of three-foot-high, orange, polyethylene, construction fencing and will extend the full distance of this portion of the BRM plus a 10-foot buffer to ensure the site is not disturbed. This fencing will serve as a clear visual barrier for construction personnel beyond which no project-related activities can occur. No less than one week prior to the start of construction, the Resident Engineer will contact the City's qualified Archaeological Consultant to assist in the installation of the ESA fencing. The qualified Archaeological Consultant will be given one business day notice of the start of ESA fencing installation. Protective measures include fencing, access restrictions, and specific contractual language. The following actions will be undertaken prior to construction: • The qualified Archeological Consultant and Certified Tribal Monitor will work closely with the Resident Engineer (RE) and Construction Contractor to educate	REIR Section 4.4.7 Project Impacts, Threshold b., subsection Mitigation Measure CUL-5, new mitigation measure

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
	all involved about potential sensitive precontact resources. A preconstruction field review will be conducted by the archaeological consultant, as well as training for construction personnel; • The ESA Map will be included in the City's RE's Pending File and clearly marked on all project plans and contract specifications (PS&E) documents; and • The ESA fencing will remain in place until the construction activities are complete. In addition to the measures outlined above, construction specifications and engineering plans will include the location of the ESA fencing and the following language: • Contractor is responsible for protection of the BRM; • Contractor will advise all construction workers of the location of the BRM and they are required to protect the BRM from an inadvertent damage; • Prior to construction activities, the City's Archaeological Consultant and Tribal will delineate the ESA for the contractor installation of a three-foot-high orange temporary construction fence with 10-foot buffer around the site; and • No construction personnel or ride-on machinery will be allowed within the ESA boundary. *Timing/Implementation:* *Prior and During project construction* *Monitoring/Enforcement:* *City of Placerville Engineering Department*	
Mitigation Measure CUL-5	**Mitigation Measure CUL-6**	REIR Section 4.4.7 Project Impacts, Threshold c., subsection Mitigation Measures Mitigation number changed throughout document
This section, incorporated from the information presented in the Natural Environment Study (NES) (Drake Haglan 2016), includes a summary of applicable regulations, a description of existing biological conditions, and an analysis of potential impacts associated with the proposed project.	This section, incorporated from the information presented in the Natural Environment Study (NES) (Dewberry 2026), includes a summary of applicable regulations, a description of existing biological conditions, and an analysis of potential impacts associated with the proposed project.	REIR Section 4.3.1 Second Sentence.
Aquatic habitat types in the BSA include riverine (perennial and intermittent drainages).	Aquatic habitat types in the BSA include riverine features (Hangtown Creek, Cedar Ravine Creek, and a drainage ditch).	REIR Section 4.3.2.1, 3rd sentence.
Cedar Ravine	Cedar Ravine Creek	Global Revisions throughout REIR Section 4.3 Biological Resources
Much of the BSA is developed or paved, and therefore, lacks vegetation. Two small areas of native vegetation communities (valley foothill riparian, montane hardwood conifer forest) were identified within the BSA and may support special-status plant species. Based on the U.S. Fish and Wildlife Service (USFWS), California Natural Diversity Database (CNDDB), and California Native Plant Society (CNPS) record searches, 14 sensitive plant species have the potential to occur in the proposed project vicinity. The habitat present in the BSA has the potential to support six of these species. None of the special-status plants were observed during surveys and the	Much of the BSA is developed or paved, and therefore, lacks vegetation. Two small areas of native vegetation communities (valley foothill riparian, montane hardwood-conifer forest) were identified within the BSA and may support special-status plant species. After completion of the field surveys and review of existing information on special-status plants from the U.S. Fish and Wildlife Service (USFWS), California Natural Diversity Database (CNDDB), and California Native Plant Society (CNPS) record searches, it was determined one special-status plant species has the potential to occur within the BSA: Sierra arching sedge (Carex cyrtostachya).	REIR Section 4.3 Biological Resources Section 4.3.2.3 Plant Species

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
habitat that occurs within the BSA is sub-optimal. No resource protection areas were identified within the proposed project area. **JEPSON'S ONION** Jepson's onion (*Allium jepsonii*) is listed by CNPS as being fairly endangered in California, meaning that 20-80 percent of the known occurrences are threatened. It is a bulbiferous perennial herb found in serpentine or volcanic soils of chaparral, cismontane woodland, and lower montane coniferous forest from 950 to 4,350 feet. It blooms April through August and is known from Butte, El Dorado, Placer, and Tuolumne counties (CNPS 2015). There are no known occurrences of Jepson's onion within five miles of the BSA. Mariposa soils and remnant areas of natural habitat occur in small portions of the BSA. Mariposa soils are frequently associated with Josephine soils and contain inclusions of Josephine soils (NRCS 2015). Josephine soils may be of volcanic origin. Observed soils in the BSA were consistent with the Mariposa series as they were relatively shallow over slate or schist bedrock. Although the potential for the BSA to provide habitat for Jepson's onion cannot be completely ruled out, it is unlikely the BSA does contains Josephine series soils. **NISSENAN MANZANITA** Nissenan manzanita (*Arctostaphylos nissenana*) is listed by CNPS as being fairly endangered in California, meaning that 20-80 percent of the known occurrences are threatened. It is a perennial evergreen shrub found in rocky closed-cone coniferous forest and chaparral habitat from 1,475 to 3,610 feet. It blooms February through March and is known from approximately ten occurrences in El Dorado and Tuolumne counties (CNPS 2015). There are six known occurrences of Nissenan manzanita within five miles of the BSA. The remnant patches of montane hardwood-conifer forest could provide potentially suitable habitat for this species. **PLEASANT VALLEY MARIPOSA LILY** Pleasant Valley mariposa lily (*Calochortus clavatus* var. *avius*) is listed by CNPS as being fairly endangered in California, meaning that 20-80 percent of the known occurrences are threatened. It is a perennial bulbiferous herb found in lower montane coniferous forest habitat with of Josephine silt loam and volcanic soils from 1,000 to 5,900 feet. It blooms May through July and is known from Amador, Calaveras, El Dorado, and Mariposa counties (CNPS 2015). There are no known occurrences of Pleasant Valley mariposa lily within five miles of the BSA. Mariposa soils and remnant areas of natural habitat occur in small portions of the proposed project area. Mariposa soils are frequently associated with Josephine soils and contain inclusions of Josephine soils (NRCS 2015). Josephine soils may be of volcanic origin. Observed soils in the BSA were consistent with the Mariposa series as they were relatively shallow over slate or schist bedrock. Although the potential for the BSA to provide habitat for Pleasant Valley mariposa-lily cannot be completely ruled out because the remnant patches of montane hardwood-conifer forest provide potentially suitable habitat for this species, it is unlikely the BSA contains Josephine series soils. **RED HILLS SOAPROOT**	Sierra arching sedge is a CNPS List 1.B species; it has no State or federal status. This species occurs in meadows, seeps, marshes, and swamps, mesic areas of lower montane coniferous forest, and riparian forest margins. There are no known occurrences of Sierra arching sedge within 5 miles of the BSA. The closest CNDDB record for Sierra arching sedge is located approximately 10 miles north of the BSA. Five plants were observed at this location in 2015. Sierra arching sedge was not observed in the BSA during site surveys; however, potential habitat exists in the BSA within the riparian habitat. Though potential habitat is of low quality given the disturbed nature of Hangtown Creek, including the retaining walls, riprap, and limited substrate, the species has low potential to occur.	

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
Red Hills soaproot (*Chlorogalum grandiflorum*) is listed by CNPS as being fairly endangered in California, meaning that 20-80 percent of the known occurrences are threatened. It is a perennial bulbiferous herb found in serpentine, gabbroic, and other soils in chaparral, cismontane woodland, and lower montane coniferous forest from 800 to 3,840 feet. It blooms May through June and is known from Amador, Calaveras, El Dorado, Placer, and Tuolumne counties (CNPS 2015). There is one recorded occurrence for Red Hills soaproot approximately four miles north of the BSA. Due to the high level of disturbance in the BSA, the only place where this plant could occur is on the hillside behind the auto part store. Most records of Red Hills soaproot in El Dorado County are from gabbro or serpentine derived soils. Although Red Hills soaproot may not be completely restricted to these soils, it is much less likely to be found on other soils such as the Mariposa series soils in the BSA. Although the potential for the BSA to provide habitat for Red Hills soaproot cannot be completely ruled out as the remnant patches of montane hardwood-conifer forest provide potentially suitable habitat for this species, it is unlikely the BSA contains gabbro or serpentine soils. **PARRY'S HORKELIA** Parry's horkelia (*Horkelia parryi*) is listed by CNPS as being fairly endangered in California, meaning that 20-80 percent of the known occurrences are threatened. It is a perennial herb found in chaparral and cismontane woodland, on lone formation and other soils, from 260 to 3,400 feet. It blooms April through September and is known from Amador, Calaveras, El Dorado, and Mariposa counties (CNPS 2015). There is one recorded occurrence for Parry's horkelia located within the BSA. The exact location of the occurrence is unknown and more specific location information is not available. The occurrence was recorded in 1923. Mariposa soils and remnant areas of natural habitat occur in small portions of the BSA; however, there are no lone formation soils. Although the potential for the BSA to provide habitat for Parry's horkelia cannot be completely ruled out as the remnant patches of montane hardwood-conifer forest provide potentially suitable habitat for this species, it is unlikely to be present because the BSA does not contain lone formation soils. **OVAL-LEAVED VIBURNUM** Oval-leaved viburnum (*Viburnum ellipticum*) is listed by CNPS as being endangered in California but common elsewhere, meaning that less than 20 percent of the known occurrences are threatened. It is a deciduous shrub found in chaparral, cismontane woodland, and lower montane coniferous forest from 700 to 4,600 feet. It blooms May through June and is known from Contra Costa, El Dorado, Fresno, Glenn, Humboldt, Mendocino, Napa, Placer, Shasta, Sonoma, and Tehama counties (CNPS 2015). There is one recorded occurrence for oval-leaved viburnum located within the BSA. The exact location of the occurrence is unknown and more specific location information is not available. The occurrence was recorded in 1901. Mariposa soils and remnant areas of natural habitat occur in small portions of the BSA; however, there are no gabbro soils. Although the potential for the BSA to provide habitat for ovalleaved viburnum cannot be completely ruled out because the remnant patches of montane hardwood-conifer forest provide potentially suitable habitat for this species, it is unlikely to be present because the BSA does not contain gabbro soils.		
4.3.2.4 Animal Species	**4.3.2.4 Animal Species**	REIR Section 4.3 Biological Resources Section 4.3.2.4 Animal Species

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
Habitats within the BSA are not accommodating for many wildlife species due to the developed nature and a strong human presence. Resident species are defined as those wildlife species that spend their entire life cycle within a single habitat or habitat complex. Based on the USFWS database and CNDDB searches, 11 sensitive animal species have the potential to occur in the BSA. The habitat present in the BSA has the potential to support two of these species – foothill yellow-legged frog (FYLF) and western pond turtle. The FYLF is a State-listed endangered species in the BSA and currently proposed for federal listing and is discussed under **Section 4.3.2.5 Threatened and Endangered Species,** below. Although Hangtown Creek is within the historic range of California red-legged frog (CRLF), this species has likely been extirpated from the City of Placerville (City).	Habitats within the BSA are not suitable for many wildlife species due to the developed nature and a strong human presence. After completion of the field surveys and review of existing information on special-status wildlife in the project region from the USFWS and CDFW record searches, it was determined that potential habitat for two special-status wildlife species occurs within the BSA: foothill yellow-legged frog (Rana boylii) and northwestern pond turtle (Actinemys marmorata). In addition, there is the potential for nesting migratory birds and raptors to occur in the BSA. The FYLF is a Federally and State-listed endangered species in the BSA and is discussed under **Section 4.3.2.5 Threatened and Endangered Species**, below. Although Hangtown Creek is within the historic range of California red-legged frog (CRLF) (Rana draytonii), this species has likely been extirpated from the City of Placerville (City).	
4.3.2.4 Animal Species Habitats within the BSA are not accommodating for many wildlife species due to the developed nature and a strong human presence. Resident species are defined as those wildlife species that spend their entire life cycle within a single habitat or habitat complex. Based on the USFWS database and CNDDB searches, 11 sensitive animal species have the potential to occur in the BSA. The habitat present in the BSA has the potential to support two of these species – foothill yellow-legged frog (FYLF) and western pond turtle. The FYLF is a State-listed endangered species in the BSA and currently proposed for federal listing and is discussed under **Section 4.3.2.5 Threatened and Endangered Species**, below. Although Hangtown Creek is within the historic range of California red-legged frog (CRLF), this species has likely been extirpated from the City of Placerville (City). **WESTERN POND TURTLE** Western pond turtles, including both the northwestern (ssp. marmorata) and southwestern (ssp. pallida) subspecies, are California state species of concern. Western pond turtles occur in a variety of permanent and intermittent aquatic habitats, such as ponds, marshes, rivers, streams, and ephemeral pools. Pond turtles require suitable basking and haul-out sites, such as emergent rocks or floating logs, which they use to regulate their temperature throughout the day (Holland 1994). In addition to appropriate aquatic habitat, these turtles require an upland oviposition site in the vicinity of the aquatic habitat, often within 200 meters (656 feet). Nests are typically dug in grassy, open fields with soils that are high in clay or silt fraction. Egg-laying usually takes place between March and August (Zeiner et al. 1988). There are two recorded occurrences of western pond turtle within five miles of the BSA. Hangtown Creek does not provide suitable habitat for this species most of the year due to its ephemeral nature, lack of suitable basking structure, heavy canopy shading, lack of forage (aquatic vegetation, fish, and amphibians), and urban setting. Although Hangtown Creek, within the BSA, is very poor habitat, it does provide a potential movement corridor for western pond turtles. The stretch of Cedar Ravine in the BSA does not provide habitat for western pond turtle because it is confined within a culvert. **OTHER MIGRATORY BIRDS AND RAPTORS** California Fish and Game Code 3503.5 protects all birds in the orders Accipitriformes, Falconiformes, and Strigiformes (collectively known as raptors or birds of prey) and includes hawks, eagles, falcons, and	**4.3.2.4 Animal Species** Habitats within the BSA are not suitable for many wildlife species due to the developed nature and a strong human presence. After completion of the field surveys and review of existing information on special-status wildlife in the project region from the USFWS and CDFW record searches, it was determined that potential habitat for two special-status wildlife species occurs within the BSA: foothill yellow-legged frog (Rana boylii) and northwestern pond turtle (Actinemys marmorata). In addition, there is the potential for nesting migratory birds and raptors to occur in the BSA. The FYLF is a State-listed endangered species in the BSA and currently proposed for federal listing and is discussed under **Section 4.3.2.5 Threatened and Endangered Species**, below. Although Hangtown Creek is within the historic range of California red-legged frog (CRLF) (Rana draytonii), this species has likely been extirpated from the City of Placerville (City). **Northwestern pond turtle** Western pond turtles, including both the northwestern (ssp. marmorata) and southwestern (ssp. pallida) subspecies, are California state species of concern. Western pond turtles occur in a variety of permanent and intermittent aquatic habitats, such as ponds, marshes, rivers, streams, and ephemeral pools. Pond turtles require suitable basking and haul-out sites, such as emergent rocks or floating logs, which they use to regulate their temperature throughout the day (Holland 1994). In addition to appropriate aquatic habitat, these turtles require an upland oviposition site in the vicinity of the aquatic habitat, often within 200 meters (656 feet). Nests are typically dug in grassy, open fields with soils that are high in clay or silt fraction. Egg-laying usually takes place between March and August (Zeiner et al. 1988). The closest recorded occurrence for NWPT is located approximately 0.9 mile southeast of the BSA. Habitat consisted of a freshwater pond, dominated by cattails; surrounded by willows, blackberry vines, rushes, native grasses, and toyon. Three adults and two juveniles were observed on May 16, 2001, with observations continued through 2002. This occurrence is associated with the El Dorado Irrigation Main Canal, which according to hydrography data in the BIOS does not connect directly with Hangtown Creek Hangtown Creek does not provide suitable habitat for this species most of the year due to lack of suitable basking structure, heavy canopy shading, lack of forage (aquatic vegetation, fish, and amphibians), and urban setting that fragments any available habitat. The stretch of Cedar Ravine	REIR Section 4.3 Biological Resources, Section 4.3.2.4 Animals

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
owls. All other migratory bird species, with the exception of nonnative and invasive bird species, are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 (16 USC 703-711). Swallows, such as the barn swallow (Hirundo rustica) and cliff swallow (Petrochelidon pyrrhonota), and black phoebes (Sayornis nigricans) commonly nest on the undersides of bridges that cross over, or are in close proximity to, aquatic habitats such as rivers, streams, and lakes. Such bridges provide suitable nesting habitat due to their proximity to nest building material and well as optimal foraging habitat. Aquatic habitats and associated corridors provide habitat for large numbers of aquatic and terrestrial insects, which are these species primary prey items. Common raptors, such as red-shouldered hawk (Buteo lineatus) and red-tailed hawk (Buteo jamaicensis), and birds, such as tree swallows (Tachycineta bicolor) and sparrows, commonly nest in large trees that overhang, or are in close proximity to (within ¼ mile), aquatic habitats such as rivers, streams, and lakes, as well as in close proximity to annual grassland and agricultural fields. Large trees provide suitable nesting habitat due to their proximity to nest building material as well as optimal foraging habitat. Aquatic and terrestrial habitats and associated corridors provide habitat for large numbers of aquatic and terrestrial insects, which are these species primary prey items. The valley foothill riparian habitat along Hangtown Creek, as well as the patches of montane hardwood-conifer forest provides potential nesting and foraging habitat for birds listed by the MBTA. No nests or nesting activity were observed during surveys conducted in 2007, 2008, 2009, or 2015.	Creek in the BSA does not provide habitat for western pond turtle because it is confined within a culvert. No NWPTs were observed during surveys conducted in 2007, 2008, 2009, or 2024. Based on the lack of recorded occurrences and lack of suitable habitat, NWPT are presumed to be absent, and are not expected to occur within the BSA. **Migratory Birds and Raptors** California Fish and Game Code 3503.5 protects all birds in the orders Accipitriformes, Falconiformes, and Strigiformes (collectively known as raptors or birds of prey) and includes hawks, eagles, falcons, and owls. All other migratory bird species, with the exception of nonnative and invasive bird species, are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 (16 USC 703-711). Swallows, such as the barn swallow (Hirundo rustica) and cliff swallow (Petrochelidon pyrrhonota), and black phoebes (Sayornis nigricans) commonly nest on the undersides of bridges that cross over, or are in close proximity to, aquatic habitats such as rivers, streams, and lakes. Such bridges provide suitable nesting habitat due to their proximity to nest building material and well as optimal foraging habitat. Aquatic habitats and associated corridors provide habitat for large numbers of aquatic and terrestrial insects, which are these species primary prey items. Common raptors, such as red-shouldered hawk (Buteo lineatus) and red-tailed hawk (Buteo jamaicensis), and birds, such as tree swallows (Tachycineta bicolor) and sparrows, commonly nest in large trees that overhang, or are in close proximity to (within ¼ mile), aquatic habitats such as rivers, streams, and lakes, as well as in close proximity to annual grassland and agricultural fields. Large trees provide suitable nesting habitat due to their proximity to nest building material as well as optimal foraging habitat. Aquatic and terrestrial habitats and associated corridors provide habitat for large numbers of aquatic and terrestrial insects, which are these species primary prey items. The valley foothill riparian habitat along Hangtown Creek, as well as the patches of montane hardwood-conifer forest provides potential nesting and foraging habitat for birds listed by the MBTA. No nests or nesting activity were observed during surveys conducted in 2007, 2008, 2009, or 2015.	
4.3.2.5 Threatened and Endangered Species **FEDERALLY LISTED OR PROPOSED PLANT SPECIES** No federally listed or proposed plant species are known, or expected, to be present in the vicinity of the BSA. There is one recorded occurrence for the federally threatened Layne's ragwort (Packera layneae) within five miles of the BSA (California Department of Fish and Wildlife [CDFW] 2020). However, it was last observed in 1978 and is now possibly extirpated because the area was graded in 1983 and the plants were not found on follow-up site visits in 1983. In addition, field surveys of the BSA in 2007, 2008, 2009, and 2015 did not find any listed or proposed plant species, or any suitable habitat for those species, including Layne's ragwort. **FEDERALLY LISTED OR PROPOSED WILDLIFE SPECIES** **FOOTHILL YELLOW-LEGGED FROG**	**FEDERALLY LISTED OR PROPOSED PLANT SPECIES** No federally listed or proposed plant species are known, or expected, to be present in the vicinity of the BSA. **FEDERALLY LISTED OR PROPOSED WILDLIFE SPECIES** **FOOTHILL YELLOW-LEGGED FROG** The foothill yellow-legged frog (FYLF) is a federal and State-listed endangered species. This species occurs in woodland and forest areas near streams and rivers, especially near riffles where there are rocks (Stebbins 2003). Egg clusters are attached to gravel or rocks in moving water near stream margins and tadpoles require water for at least 3 or 4 months while completing their aquatic development (Zeiner et al. 1988). FYLF require permanent streams in which to reside (Verner and Boss 1980).	REIR Section 4.3 Biological Resources, Section 4.3.2.5 Threatened and Endangered Species

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
The foothill yellow-legged frog (FYLF) is a State-listed endangered species in the BSA and is currently proposed for federal listing. This species occurs in woodland and forest areas near streams and rivers, especially near riffles where there are rocks (Stebbins 2003). Egg clusters are attached to gravel or rocks in moving water near stream margins and tadpoles require water for at least 3 or 4 months while completing their aquatic development (Zeiner et al. 1988). FYLF require permanent streams in which to reside (Verner and Boss 1980). FYLF have not been recorded as occurring within five miles of the BSA. FYLF were not observed in the BSA during the reconnaissance surveys, general biological survey, the delineation fieldwork, or during the CRLF surveys conducted within Hangtown Creek within a 2.5-mile radius of the BSA. Hangtown Creek in the BSA provides only marginal habitat for FYLF due to the high levels of disturbance and the crayfish and sunfish that are abundant throughout the creek. The stretch of Cedar Ravine in the BSA does not provide habitat for FYLF because it is mostly confined within a culvert. Based on the best scientific and commercial information available, FYLF does not currently occupy the BSA. **CALIFORNIA RED-LEGGED FROG** California red-legged frog (CRLF) (Rana draytonii) was listed as a federal-threatened species on May 23, 1996 and was listed on the species list obtained from USFWS. Its habitat includes specific aquatic and riparian components. The closest occurrence was recorded over 10 miles east of the BSA. The BSA and vicinity have been investigated several times in the last 15 years for various projects. Sycamore Environmental conducted two separate surveys for CRLF in 2006 and 2007 in accordance with the USFWS August 2005 guidelines for a project located approximately 1.5 miles west of the proposed project (Sycamore Environmental 2006a and 2007). Hangtown Creek at the Clay Street Bridge was included in the surveys during both years. No CRLF were found in Hangtown Creek at Clay Street or at any of the other survey locations (Sycamore Environmental 2006a and 2007). Additionally, four other CRLF field surveys (three conducted under the USFWS 1997 guidelines and one conducted under the USFWS 2005 guidelines) were conducted in the vicinity of the BSA between 2001 and 2006 (Sycamore Environmental 2001, 2004, 2005, and 2006b). Combined, the six field surveys covered more than 30 sites within a 2.5-mile radius of the proposed project area. No CRLF were found during any of the surveys. Sycamore Environmental prepared a CRLF Site Assessment for a section of the El Dorado Trail in Smith Flat (Sycamore Environmental 1999). In April 1999, Mr. Jason Davis, a biologist with USFWS, concluded that the El Dorado Trail project would not affect CRLF. Sycamore Environmental biologists also conducted preconstruction surveys and construction monitoring in Hangtown Creek approximately 1.5 miles west of Clay Street. No CRLF were found during the preconstruction surveys or construction monitoring. Within the BSA, Hangtown Creek does not provide suitable breeding habitat for CRLF due to the lack of emergent vegetation, and the absence of deep, slow moving backwater or pools during the breeding season. In addition, Hangtown Creek is highly disturbed, and crayfish and sunfish are abundant throughout the creek. The stretch of Cedar Ravine in the BSA does not provide habitat for CRLF because it is mostly confined to a culvert.	There are various recorded occurrences in CNDDB of FYLF within approximately 10 miles of the BSA, many of which are reported extirpated. A few extant occurrences are reported in CNDDB but none of these extant occurrences are within the Weber Creek watershed. FYLF were not observed in the BSA during the reconnaissance surveys, general biological survey, the delineation fieldwork, or during the protocol CRLF and FYLF surveys conducted in the BSA and within a 2.5-mile radius of the BSA. Hangtown Creek in the BSA provides very marginal habitat for FYLF. This reach of the creek is located within the city of Placerville and is surrounded by heavy development on both sides, including Highway 50 and residential lots to the north and extensive commercial areas to the south, with some portions channelized underground beneath these developed areas, creating high levels of disturbance and fragmentation including retaining walls and other hardscape features. Crayfish and sunfish are also abundant throughout the creek. Furthermore, Hangtown Creek within the BSA lacks the suitable breeding conditions that FYLF require, such as permanent, shallow, flowing water and absence of predators. Hangtown Creek is a tributary to Weber Creek, whose watershed has no recent or extant observations of FYLF. Due to the very marginal, dilapidated habitat and lack of any recent occurrences within the local watershed, Hangtown Creek, and potentially the larger Weber Creek watershed, likely does not support a FYLF population. This is further evidenced by information from CNDDB indicating that no FYLF have been detected in North Fork Weber Creek during herpetofauna surveys conducted in 1997, 2000, 2001, 2002, or in 2017. Cedar Ravine Creek, a tributary to Hangtown Creek, is confined entirely within an underground culvert within the BSA, and therefore also does not provide suitable habitat for FYLF. Based on this information, FYLF are presumed to be extirpated within the vicinity of Placerville, including the BSA, and are not expected to occur.	

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Based on CRLF survey information conducted in accordance with the USFWS 1997 and 2005 guidelines in the City, previous USFWS determinations, the lack of suitable CRLF habitat in Hangtown Creek and the City, and using the best scientific and commercial information, the BSA is unoccupied by CRLF. In addition, the BSA is not within critical habitat designated for CRLF nor is it within a core area identified in the Recovery Plan for the California red-legged frog (Rana aurora draytonii) (USFWS 2002). This species was not identified within the BSA during protocol-level surveys conducted between 2001 and 2006 and the closest recorded occurrence is more than 10 miles away, well outside the known dispersal range for this species.		
The description of existing conditions and impact analysis presented in this section is taken from the NES (Drake Haglan 2016).	The description of existing conditions and impact analysis presented in this section is taken from the NES (Dewberry 2026).	REIR Section 4.3 Biological Resources, Section 4.3.4.1 Methodology
CONSTRUCTION Construction activities have the potential to affect five special-status plant species, Jepson's onion, Nissenan mazanita, Pleasant Valley mariposa lily, Red Hills soaproot, and Parry's horkelia. These species were not identified in the BSA during previous botanical surveys. However, because the species are known to occur within 10 miles of the proposed project, they have the potential to disperse into the BSA prior to construction. **Mitigation Measure BIO-1** would be required to identify if the plants are present and provide guidance if they are identified prior to the commencement of construction activities. This is a potentially significant impact. Construction of the proposed project could affect two special-status wildlife species, western pond turtle and FYLF. In addition, there is potential for the proposed project to impact nesting migratory birds and raptors. Each of these species is discussed below. Construction activities could result in the loss of special-status wildlife, which would be a potentially significant impact. **Western Pond Turtle** aquatic and upland habitat is present in the study area. If turtles are present within the work area during construction, the movement of equipment in uplands and construction of the bridge components could crush turtles or nests containing eggs or young, which could result in mortality or injury. Mitigation measures would be required to reduce impacts to western pond turtle. **Foothill Yellow-Legged Frog (FYLF)** was not observed in the BSA. Based on the best available information, it does not currently occupy the BSA. Hangtown Creek provides marginal breeding and dispersal habitat. The proposed project would not affect potential breeding habitat because aquatic resources within the BSA are unlikely to provide adequate ponding depth and duration to support metamorphosis. However, mortality or injury of frogs in aquatic and upland habitats could occur by crushing by construction equipment or if frogs are displaced from cover, exposing them to predators and desiccation. Trenches left open during the night could trap frogs moving through the construction area. Construction activities could also temporarily impede the movement of juvenile and adult frogs dispersing between breeding areas and summer refugia sites. The proposed project would administer Best Management Practices (BMPs) to protect water quality and control erosion (refer to **Section 4.7, Hydrology and Water Quality**). Additionally, mitigation specific to the FYLF would be required to reduce impacts to FYLF. **Migratory Birds and Raptors.** If demolition of the Clay Street Bridge begins during the breeding season (February 1 through August 31), the proposed project could result in mortality of young through forced fledging or nest abandonment by adult birds. Exclusion of nesting adult birds from the underside of the	**Construction** Construction activities have the potential to affect one special-status species: Sierra arching sedge. Construction activities could also potentially affect nesting migratory birds and raptors. **Sierra Arching Sedge** This plant could be impacted if present in the BSA. This species was not identified in the BSA during previous botanical surveys; however, potential habitat exists in the BSA within the riparian habitat. **Mitigation Measure BIO-1** would be required to identify if this species is present in the BSA and provide guidance if it is identified prior to the commencement of construction activities. This is a potentially significant impact. **Migratory Birds and Raptors.** If demolition of the Clay Street Bridge begins during the breeding season (February 1 through September 30), the proposed project could result in mortality of young through forced fledging or nest abandonment by adult birds. Exclusion of nesting adult birds from the underside of the Clay Street Bridge could potentially result in disruption of nesting activities and the loss of nesting productivity for the season for some birds that do not move to other nesting sites outside of the BSA. However, widening of the bridge could ultimately result in a net increase of potential nesting habitat for swallows, black phoebes, and other bridge nesting birds. Mitigation measures would be required to reduce impacts to migratory birds and raptors. The proposed project would remove up to 20 trees during construction, the majority are within the riparian corridor or within the montane hardwood-conifer areas. Prior to construction, if construction activities begin during the breeding season (February 1 through September 30), the proposed project could result in mortality of young through forced fledging or nest abandonment by adult birds, as well as destruction of nests. Mitigation measures would be required to reduce impacts to migratory birds and raptors, and nesting birds. **Mitigation Measure BIO-2** would be required to identify if an active nest is present in the BSA and provide guidance if it is identified prior to the commencement of construction activities. This is a potentially significant impact. **Operation**	REIR Section 4.3 Biological Resources, Threshold A discussion. Reference to mitigation measure changed throughout document

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
Clay Street Bridge could potentially result in disruption of nesting activities and the loss of nesting productivity for the season for some birds that do not move to other nesting sites outside of the BSA. However, widening of the bridge could ultimately result in a net increase of potential nesting habitat for swallows, black phoebes, and other bridge nesting birds. Mitigation measures would be required to reduce impacts to migratory birds and raptors. The proposed project would remove up to 20 trees during construction, the majority is within the riparian corridor or within the montane hardwood-conifer areas. Prior to construction of construction activities begin during the breeding season (February 1 through August 31), the proposed project could result in mortality of young through forced fledging or nest abandonment by adult birds, as well as destruction of nests. Mitigation measures would be required to reduce impacts to migratory birds and raptors, and nesting birds. **OPERATION** The BSA would be revegetated and returned to conditions similar to existing. Operation of the proposed project would be similar to existing conditions; therefore, the proposed project would not impact special-status species beyond what currently exists. **MITIGATION MEASURES** **Mitigation Measure BIO-1:** A preconstruction survey for Jepson's onion, Nissenan manzanita, Pleasant Valley mariposa lily, Red Hills soaproot, and Parry's horkelia shall be conducted in the project impact area within 30 days prior to construction. If a specific plant is not found, no further measures are necessary for that plant. If a specific plant is found in the project impact area, the CDFW shall be notified at least 10 days prior to construction impacts in the vicinity of the plant(s) in accordance with the California Native Plant Protection Act of 1977 to allow sufficient time to transplant the individuals to a suitable location or develop other mitigation measures that will offset the loss and maintain the regional species population in coordination with the CDFW. *Timing/Implementation: Prior to construction* *Monitoring/Enforcement: City of Placerville Engineering Department, and Consultant Biologist* **Mitigation Measure BIO-2:** Foothill yellow-legged frog (FYLF). The following efforts shall be implemented in order to reduce potential project effects to FYLF: • A qualified biologist will conduct a preconstruction survey within 24 hours prior to the start of construction activities within the riparian and aquatic habitat in the Biologically Sensitive Area (BSA). • A qualified biologist will monitor any vegetation removal in Hangtown Creek. The biologist will monitor the installation of water diversion structures placed in Hangtown Creek. • The upstream and downstream limits of the project will be flagged and/or fenced and signed to prevent the encroachment of construction personnel and equipment into any sensitive areas during project work. • Prior to construction, environmental awareness training will be conducted for construction personnel to brief them on how to recognize FYLF. Construction	The BSA would be revegetated and returned to conditions similar to existing. Operation of the proposed project would be similar to existing conditions; therefore, the proposed project would not impact special-status species beyond what currently exists. **Mitigation Measures** **Mitigation Measure BIO-1:** A qualified biologist or botanist shall conduct focused surveys for Sierra arching sedge during the normal blooming or identifying period for these species. The surveys shall be conducted within the construction area and prior to any ground disturbing activities. The results of the survey shall be documented in a concise memorandum. If the survey results are negative, work can proceed without additional measures. If Sierra arching sedge is identified within the construction area, a qualified biologist shall prepare a salvage and relocation plan to avoid and minimize direct impacts to special-status plants. The plan shall identify the methods of salvage (e.g., seed collection, individual transplants) and the relocation area(s). Salvage efforts shall be conducted in coordination with CDFW and the local CNPS chapter. *Timing/Implementation: Prior to construction* *Monitoring/Enforcement: City of Placerville Engineering Department, and Consultant Biologist* **Mitigation Measure BIO-2:** Migratory Birds and Raptors. The following measures shall be used when work occurs on or in the vicinity of trees or structures that may be subject to nesting by migratory birds: • To avoid and minimize impacts to tree and shrub nesting species, the following measures shall be implemented: ▪ Tree and shrub removal and grading activities shall be conducted during the non-breeding season (generally October 1 through January 31), if the construction schedule allows. ▪ If grading and tree removal activities are scheduled to occur during the breeding and nesting season (February 1 through September 30), preconstruction surveys shall be performed prior to the start of project activities. • If construction, grading, or other project-related activities are scheduled during the nesting season (February 1 to September 30), preconstruction surveys for other migratory bird species shall take place no less than 14 days and no more than 30 days prior to the beginning of construction within 250 feet of suitable nesting habitat. ▪ If the preconstruction surveys do not identify any nesting migratory bird species in areas potentially affected by construction activities, no further avoidance or minimization measures would be required. ▪ If the preconstruction surveys do identify nesting bird species in areas that may be affected by site construction, the following measure shall be implemented:	

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
personnel should also be informed that if a FYLF is encountered in the work area, construction should stop and CDFW contacted for guidance. A training log sign-in sheet will be maintained. • If FYLF are found at any time during project work, construction will stop and CDFW will be contacted immediately for further guidance. • Staging areas, as well as fueling and maintenance activities, shall be a minimum of 100 feet from riparian or aquatic habitats. The project proponent will prepare a spill prevention and clean-up plan. • During temporary dewatering by pumping, intakes shall be completely screened with wire mesh not larger than five millimeters. • Upon completion of construction activities, any barriers to flow shall be removed in a manner that would allow flow to resume with the least disturbance to the substrate. *Timing/Implementation: Prior, during and after construction* *Monitoring/Enforcement: City of Placerville Engineering Department, and Consultant Biologist* **Mitigation Measure BIO-3:** Western Pond Turtle. The following efforts shall be implemented in order to reduce potential project effects to western pond turtle: • During temporary dewatering by pumping, the construction area shall be dewatered prior to construction activities. CDFW shall be notified prior to dewatering activities. • No more than two weeks prior to the commencement of ground-disturbing activities, the City shall retain a qualified biologist to perform surveys for western pond turtle within suitable aquatic and upland habitat within the project site. Surveys will include western pond turtle nests as well as individuals. The biologist (with the appropriate agency permits) will temporarily move any identified western pond turtles upstream of the construction area, and temporary barriers will be placed around the construction area to prevent ingress. Construction will not proceed until the work area is determined to be free of turtles. The results of these surveys will be documented in a technical memorandum that will be submitted to CDFW (if turtles are documented). *Timing/Implementation: Prior and during construction* *Monitoring/Enforcement: City of Placerville Engineering Department, and Consultant Biologist* **Mitigation Measure BIO-4:** Migratory Birds and Raptors. The following measures shall be used when work occurs on or in the vicinity of structures that may be subject to nesting by migratory birds: • To avoid and minimize impacts to tree and shrub nesting species, the following measures shall be implemented: • Tree and shrub removal and grading activities shall be conducted during the non breeding season (generally September 1 through January 31), if the construction schedule allows.	• Project-related construction impacts shall be avoided by establishing appropriate no-work buffers to limit project-related construction activities near the nest site. The size of the no-work buffer zone shall be determined in consultation with the CDFW. The no-work buffer zone shall be delineated by highly visible temporary construction fencing. In consultation with the CDFW, monitoring of nest activity by a qualified biologist may be required if the project-related construction activity has the potential to adversely affect the bird's nest or nesting behavior. No project-related construction activity shall commence within the no-work buffer area until a qualified biologist confirms that the nest is no longer active. • The following measures shall be incorporated for bridge-nesting birds if bridge demolition or construction of the new bridge occurs during the nesting season (February 1 through September 30): ▪ Exclusionary netting shall be installed around the undersides of the existing bridge before February 1 of the construction year to prevent new nests from being formed and/or prevent the reoccupation of existing nests. Exclusionary netting may also be required during construction of the new bridge if it is completed during the breeding season. The construction contractor would be required to do the following: • Adhere to all state and federal laws and regulations pertaining to the protection of migratory birds, their nests, and young birds. • Remove all existing unoccupied nests on the bridge during the non-nesting season (October 1 through January 31). • Keep the bridge free of nests, using exclusionary netting or other approved methods, until construction activities are completed. • Inspect all listed structures for nesting activity a minimum of three days per week; no two days of inspection shall be consecutive. A weekly log shall be submitted to the project biologist. The contractor shall continue inspections until the existing bridge has been removed and construction on the new bridge is completed. If an exclusion device is found to be ineffective or defective, the contractor shall complete repairs to the device within 24 hours. If birds are found trapped in an exclusion device, the contractor shall immediately remove the birds in accordance with USFWS guidelines. • Submit for approval working drawings or written proposals of any exclusion devices, procedures, or methods to the project biologist before installing them. • The method of installing exclusion devices shall not damage permanent features of the new bridge structure. Approval by the	

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• If grading and tree removal activities are scheduled to occur during the breeding and nesting season (February 1 through August 31), preconstruction surveys shall be performed prior to the start of project activities. • If construction, grading, or other project-related activities are scheduled during the nesting season (February 1 to August 31), preconstruction surveys for other migratory bird species shall take place no less than 14 days and no more than 30 days prior to the beginning of construction within 250 feet of suitable nesting habitat. ○ If the preconstruction surveys do not identify any nesting migratory bird species in areas potentially affected by construction activities, no further action is required. ○ If the preconstruction surveys do identify nesting bird species in areas that may be affected by site construction, the following measure shall be implemented: ▪ Project-related construction impacts shall be avoided by establishing appropriate no-work buffers to limit projectrelated construction activities near the nest site. The size of the no-work buffer zone shall be determined in consultation with the CDFW. The no-work buffer zone shall be delineated by highly visible temporary construction fencing. In consultation with the CDFW, monitoring of nest activity by a qualified biologist may be required if the project-related construction activity has the potential to adversely affect the bird's nest or nesting behavior. No project-related construction activity shall commence within the no-work buffer area until a qualified biologist confirms that the nest is no longer active. ○ The following measures shall be incorporated for bridge-nesting birds if bridge demolition or construction of the new bridge occurs during the nesting season (February 1 through August 31): ▪ Exclusionary netting shall be installed around the undersides of the existing bridge before February 1 of the construction year to prevent new nests from being formed and/or prevent the reoccupation of existing nests. Exclusionary netting may also be required during construction of the new bridge if it is completed during the breeding season. The construction contractor would be required to do the following: • Remove all existing unoccupied nests on the bridge during the non-nesting season (September 1 through January 31). • Keep the bridge free of nests, using exclusionary netting or other approved methods, until construction activities are completed.	project biologist of the working drawings or inspection performed by the authorized project biologist shall in no way relieve the contractor of full responsibility for deterring nesting. *Timing/Implementation:* *Prior and during construction* *Monitoring/Enforcement:* *City of Placerville Engineering Department, and Consultant Biologist* **Level of Significance After Mitigation** Impacts regarding special status species were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measure BIO-1** and **BIO-2** were required or included, which would implement surveys, exclusionary measures, nest avoidance and other approaches to avoid harm to special status species. The impact level would be **less than significant with mitigation**.	

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
• Inspect all listed structures for nesting activity a minimum of three days per week; no two days of inspection shall be consecutive. A weekly log shall be submitted to the project biologist. The contractor shall continue inspections until the existing bridge has been removed and construction on the new bridge is completed. If an exclusion device is found to be ineffective or defective, the contractor shall complete repairs to the device within 24 hours. If birds are found trapped in an exclusion device, the contractor shall immediately remove the birds in accordance with USFWS guidelines. • Submit for approval working drawings or written proposals of any exclusion devices, procedures, or methods to the project biologist before installing them. ▪ The method of installing exclusion devices shall not damage permanent features of the new bridge structure. Approval by the project biologist of the working drawings or inspection performed by the authorized project biologist shall in no way relieve the contractor of full responsibility for deterring nesting. *Timing/Implementation: Prior and during construction* *Monitoring/Enforcement: City of Placerville Engineering Department, and Consultant Biologist* **LEVEL OF SIGNIFICANCE AFTER MITIGATION** Impacts regarding special status species were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measure BIO-1** through **BIO-4** were required or included, which would implement surveys, exclusionary measures, nest avoidance and other approaches to avoid harm to special status species. The impact level would be **less than significant with mitigation**.		
<0.01	0.00	REIR Section 4.3 Biological Resources, Table 4.3-3 third row, second column.
MITIGATION MEASURES **Mitigation Measure BIO-5:** The following shall be implemented to reduce project effects on riparian and montane hardwood-conifer vegetation, oaks, and other native trees: • Prior to removal of any trees, an ISA-certified arborist shall conduct a tree survey in areas that may be impacted by construction activities and that are not already slated for community-wide fire hardening. This survey shall document tree resources that may be adversely impacted by project implementation. The survey will follow standard professional practices. • Current riparian vegetation, oaks, and other native tree species will be retained to the extent feasible. A tree protection zone (TPZ) shall be established around any tree or group of trees to be retained. The TPZ will be delineated by an ISA-certified arborist. The TPZ shall be defined by	**Mitigation Measures** **Mitigation Measure BIO-3:** The following shall be implemented to reduce project effects on riparian and montane hardwood-conifer vegetation, oaks, and other native trees: • Prior to removal of any trees, an ISA-certified arborist shall conduct a tree survey in areas that may be impacted by construction activities and that are not already slated for community-wide fire hardening. This survey shall document tree resources that may be adversely impacted by project implementation. The survey will follow standard professional practices. • Current riparian vegetation, oaks, and other native tree species will be retained to the extent feasible. A tree protection zone (TPZ) shall be established around any tree or group of trees to be retained. The TPZ will be delineated by an ISA-certified arborist. The TPZ shall be defined	REIR Section 4.3 Biological Resources, Threshold b discussion. Reference to mitigation measure changed throughout document

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
the radius of the dripline of the tree(s) plus 1 foot. The TPZ of any protected trees shall be demarcated using fencing that will remain in place for the duration of construction activities. • Construction-related activities shall be limited within the TPZ to those activities that can be completed by hand. No heavy equipment or machinery shall be operated within the TPZ. Grading shall be prohibited within the TPZ. No construction materials, equipment, or heavy machinery shall be stored within the TPZ. • To ensure no net loss of riparian habitat, the City shall create or restore riparian habitat that is of similar function and value to affected habitat. The permanent degradation of riparian and montane hardwood-conifer habitat will be compensated for at a 3:1 ratio within the watershed or through the purchase of similar habitat value from a USACE-approved mitigation bank. Preservation and restoration may occur on-site or within the watershed through a conservation agreement or off-site by purchasing mitigation bank credits. • A planting plan will be implemented as detailed in a restoration plan approved by the CDFW. The plan will include performance standards for revegetation that will ensure successful restoration of the on-site riparian areas including replanting trees. • Protective fencing shall be installed along the edge of construction areas including temporary and permanent access roads where construction will occur (as determined by a qualified biologist). The location of fencing shall be marked in the field with stakes and flagging and shown on the construction drawings. The construction specifications shall contain clear language that prohibits construction-related activities, vehicle operation, material and equipment storage, trenching, grading, or other surface disturbing activities outside of the designated construction area. Signs shall be erected along the protective fencing at a maximum spacing of one sign per 50 feet of fencing. The signs shall state: "This area is environmentally sensitive; no construction or other operations may occur beyond this fencing. Violators may be subject to prosecution, fines, and imprisonment." The signs shall be clearly readable at a distance of 20 feet and shall be maintained for the duration of construction activities in the area. • Where riparian vegetation occurs along the edge of the construction easement, the City shall minimize the potential for long-term loss of riparian vegetation by trimming vegetation rather than removing the entire plant. Trimming will be conducted per the direction of a biologist and/or certified arborist. • The City shall compensate for the permanent removal of riparian and montane hardwood-conifer habitat vegetation associated with the bridge construction by replacing habitat at a minimum 3:1 ratio (e.g., 3 acres planted for every 1 acre removed) as well as associated native herbaceous species. *Timing/Implementation: Prior and during construction* *Monitoring/Enforcement: City of Placerville Engineering Department, and Consultant Biologist* **LEVEL OF SIGNIFICANCE AFTER MITIGATION**	by the radius of the dripline of the tree(s) plus 1 foot. The TPZ of any protected trees shall be demarcated using fencing that will remain in place for the duration of construction activities. • Construction-related activities shall be limited within the TPZ to those activities that can be completed by hand. No heavy equipment or machinery shall be operated within the TPZ. Grading shall be prohibited within the TPZ. No construction materials, equipment, or heavy machinery shall be stored within the TPZ. • Protective fencing shall be installed along the edge of construction areas including temporary and permanent access roads where construction will occur (as determined by a qualified biologist). The location of fencing shall be marked in the field with stakes and flagging and shown on the construction drawings. The construction specifications shall contain clear language that prohibits construction-related activities, vehicle operation, material and equipment storage, trenching, grading, or other surface-disturbing activities outside of the designated construction area. Signs shall be erected along the protective fencing at a maximum spacing of one sign per 50 feet of fencing. The signs shall state: "This area is environmentally sensitive; no construction or other operations may occur beyond this fencing. Violators may be subject to prosecution, fines, and imprisonment." The signs shall be clearly readable at a distance of 20 feet and shall be maintained for the duration of construction activities in the area. • Where riparian vegetation occurs along the edge of the construction easement, the City shall minimize the potential for long-term loss of riparian vegetation by trimming vegetation rather than removing the entire plant. Trimming will be conducted per the direction of a biologist and/or certified arborist. • To compensate for the permanent removal of riparian vegetation associated with the bridge construction, the City shall compensate for riparian tree and shrub removal by replacing habitat at a minimum 3:1 ratio (e.g., 3 acres planted for every one acre removed) as well as associated native herbaceous species, subject to regulatory permit conditions. Preservation and restoration may occur onsite or within the watershed through a conservation agreement or offsite through purchasing mitigation bank credits. • Any onsite mitigation shall include planting of valley foothill/floodplain/mixed riparian species as appropriate. A planting plan will be implemented as detailed in a Restoration Plan approved by the CDFW. The Restoration Plan will include performance standards for revegetation that will ensure successful restoration of the onsite riparian areas. *Timing/Implementation: Prior and during construction* *Monitoring/Enforcement: City of Placerville Engineering Department, and Consultant Biologist* **Level of Significance After Mitigation** Impacts regarding effects on any riparian habitat or other sensitive natural community were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measure BIO-3** was required or included, and the impact level would be lowered to **less than significant with mitigation**.	

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
Impacts regarding effects on any riparian habitat or other sensitive natural community were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measure BIO-5** was required or included, and the impact level would be lowered to **less than significant with mitigation.**		
A planting plan, as required in **Mitigation Measures BIO-5**, would help to reduce impacts to Hangtown Creek and Cedar Ravine.	A planting plan, as required in **Mitigation Measures BIO-3**, would help to reduce impacts to Hangtown Creek and Cedar Ravine Creek.	REIR Section 4.3 Biological Resources, Threshold C discussion, under subheading Construction, last sentence of second paragraph.
OPERATIONAL The proposed project would result in permanent fill that would affect 0.001 acre of intermittent stream (other waters of the U.S.). Features such as wetlands and other waters of the U.S. that may fall under the jurisdictional purview of the USACE were delineated in the BSA. Hangtown Creek is considered potentially jurisdictional. Removal of the existing bridge and construction of the new bridge and its abutments would involve construction activities along the banks of Hangtown Creek. Based on the preliminary project design, rock slope protection (RSP) would be installed on the banks of Hangtown Creek and would result in permanent impacts of approximately 0.001 acre. This is a potentially significant impact and mitigation would be required. **MITIGATION MEASURES** Implement **Mitigation Measure BIO-5.** **Mitigation Measure BIO-6:** The City shall purchase credits from a USACE and/ or CDFW-approved mitigation bank at a minimum 1:1 ratio (1 acre of habitat replaced for every 1 acre filled). *Timing/Implementation: During permitting* *Monitoring/Enforcement: City of Placerville Engineering Department* **LEVEL OF SIGNIFICANCE AFTER MITIGATION** Impacts regarding effects on wetlands or Waters of the U.S. were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measure BIO-6** was required or included, and the impact level would be **less than significant with mitigation**.	**Operational** Features such as wetlands and other waters of the U.S. that may fall under the jurisdictional purview of the USACE were delineated in the BSA. Hangtown Creek is considered potentially jurisdictional. Removal of the existing bridge and construction of the new bridge and its abutments would involve construction activities along the banks of Hangtown Creek. Based on the preliminary project design, rock slope protection (RSP) would be installed on the banks of Hangtown Creek but would not permanently impact the Creek due to the minimal footprint of the RSP installation area. As a result, no impacts would occur and mitigation would not be required. **Mitigation Measures** Implement **Mitigation Measure BIO-3.** *Timing/Implementation: During permitting* *Monitoring/Enforcement: City of Placerville Engineering Department* **Level of Significance After Mitigation** Impacts regarding effects on wetlands or Waters of the U.S. were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measure BIO-3** was required or included, and the impact level would be **less than significant with mitigation**.	REIR Section 4.3 Biological Resources, Threshold C discussion under subheader Operation.
Construction activities could temporarily affect dispersal habitat for western pond turtle, FYLF, and migratory birds and raptors, as described in Threshold a; however, no additional impacts beyond those described in Threshold a would occur, but as such is a potentially significant impact and mitigation would be required. The proposed project would not reduce wildlife movement potential because no permanent improvements are proposed within Hangtown Creek that would create physical barriers to dispersal. The culverted section of Cedar Ravine would continue to allow flow into Hangtown Creek. **MITIGATION MEASURES** Implement **Mitigation Measure BIO-2, BIO-3, and BIO-4.** **LEVEL OF SIGNIFICANCE AFTER MITIGATION**	Construction activities could temporarily affect migratory birds and raptors, as described in **Threshold a**; however, no additional impacts beyond those described in **Threshold a** would occur, but as such is a potentially significant impact and mitigation would be required. The proposed project would not reduce wildlife movement potential because no permanent improvements are proposed within Hangtown Creek that would create physical barriers to dispersal. The culverted section of Cedar Ravine would continue to allow flow into Hangtown Creek. **Mitigation Measures** Implement **Mitigation Measure BIO-1 and BIO-2**. **Level of Significance After Mitigation** Impacts regarding movement of any native resident or migratory fish or wildlife species were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measures BIO-1**	REIR Section4.3 Biological Resources, Threshold D discussion.

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
Impacts regarding movement of any native resident or migratory fish or wildlife species were determined to be potentially significant without mitigation. Therefore, **Mitigation Measure BIO-2, BIO-3, and BIO-4** was required or included, and the impact level would be less than significant with mitigation.	**and BIO-2** were required or included, and the impact level would be **less than significant with mitigation**.	
As discussed in **Threshold a**, the proposed project could result in impacts to dispersal habitat for western pond turtle, FYLF, and migratory birds and raptors during construction activities. Mitigation Measures would be required to reduce construction impacts. Upon construction completion, the proposed project area would operate similarly to existing conditions, thus operations of the proposed project would not result in a reduction of number or restriction oof range for a federal or State listed endangered, rare, or threatened species. No additional impacts beyond those described in **Threshold a** would occur, but as such is a potentially significant impact and mitigation would be required. **MITIGATION MEASURES** Implement **Mitigation Measure BIO-1** and **Bio-6**. **LEVEL OF SIGNIFICANCE AFTER MITIGATION** Impacts regarding substantially degrading the quality of the environment were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measure BIO-1** through **BIO-6** was required or included, and the	As discussed in **Threshold a**, the proposed project could result in impacts to migratory birds and raptors during construction activities. Mitigation Measures would be required to reduce construction impacts. Upon construction completion, the proposed project area would operate similarly to existing conditions, thus operations of the proposed project would not result in a reduction of number or restriction oof range for a federal or State listed endangered, rare, or threatened species. No additional impacts beyond those described in **Threshold a** would occur, but as such is a potentially significant impact and mitigation would be required. **Mitigation Measures** Implement **Mitigation Measure BIO-1** and **BIO-2**. **Level of Significance After Mitigation** Impacts regarding substantially degrading the quality of the environment were determined to be **potentially significant** without mitigation. Therefore, **Mitigation Measures BIO-1** and **BIO-2** were required or included, and the impact level would be lowered to **less than significant with mitigation**.	REIR Section4.3 Biological Resources, Threshold E discussion.
The proposed project could affect special-status plant and wildlife species, as well as migratory birds and raptors. Pre-construction surveys for species and implementation of measures, as identified in **Mitigation Measures BIO-1 through BIO-4** would reduce project impacts to a less that significant level. Housing and commercial development planned within the City limits included as cumulative projects also could result in affects to special-status plant and wildlife species, as well as migratory birds and raptors, and could result in potential impacts to these species. These projects would mitigate impacts on special-status plant and wildlife species, ensuring that impacts on these species would be less than significant with mitigation. Additionally, the proposed project, like all other development activities in the cumulative study area, would be required to comply with State and federal law to implement project-level mitigation measures for impacts to special-status plant and wildlife species, as well as migratory birds and raptors. This regulatory structure would reduce the incremental contribution of the proposed project to any potential cumulative impact. Therefore, the proposed project impacts would not be cumulatively significant. The proposed project would result in a direct, permanent impact on 0.04 acre of valley foothill riparian habitat and 0.01 acre of montane hardwood-conifer forest habitat. The cumulative planned within the City limits could involve potential impacts to riparian habitats and other sensitive communities within in the Placerville area, including valley foothill riparian and montane hardwood-conifer forests. Implementation of mitigation described in **Mitigation Measures BIO-5** would reduce the proposed project-specific impacts to a less than significant level. Additionally, the proposed project, like all other development activities in the cumulative study area (refer to **Table 3.6-1**), would be required to comply with State and federal law to preclude or mitigate for impacts and provide BMPs during construction. This regulatory	The proposed project could affect special-status plant and wildlife species including migratory birds and raptors. Pre-construction surveys for species and implementation of measures, as identified in **Mitigation Measures BIO-1 through BIO-2** would reduce project impacts to a less than significant level. Housing and commercial development planned within the City limits included as cumulative projects also could result in effects to special-status plant and wildlife species, as well as migratory birds and raptors, and could result in potential impacts to these species. These projects would mitigate impacts on special-status plant and wildlife species, ensuring that impacts on these species would be less than significant with mitigation. Additionally, the proposed project, like all other development activities in the cumulative study area, would be required to comply with State and federal law to implement project-level mitigation measures for impacts to special-status plant and wildlife species, including migratory birds and raptors. This regulatory structure would reduce the incremental contribution of the proposed project to any potential cumulative impact. Therefore, the proposed project impacts would not be cumulatively significant. The proposed project would result in a direct, permanent impact on 0.04 acre of valley foothill riparian habitat and 0.01 acre of montane hardwood-conifer forest habitat. The cumulative planned within the City limits could involve potential impacts to riparian habitats and other sensitive communities within in the Placerville area, including valley foothill riparian and montane hardwood-conifer forests. Implementation of mitigation described in **Mitigation Measure BIO-3** would reduce the proposed project-specific impacts to a less than significant level. Additionally, the proposed project, like all other development activities in the cumulative study area (refer to **Table 3.6-1**), would be required to comply with State and federal law to preclude or mitigate for impacts and provide BMPs during construction. This regulatory structure would reduce the incremental	

TABLE 7.2.1 SUMMARY OF REVISIONS		
ORIGINAL TEXT	**REVISED/ADDED TEXT**	**REFERENCE**
structure would reduce the incremental contribution of the proposed project to any potential cumulative impact. Therefore, the proposed project impacts would not be cumulatively significant. The proposed project would result in a direct, permanent impact on approximately 0.001 acre of intermittent stream. Implementation of avoidance and minimization efforts and restoration/compensatory mitigation described in **Mitigation Measures BIO-6** would reduce the proposed project-specific impacts to a less than significant level**.** Cumulative projects described in **Table 3.6-1** could potentially impact wetlands or Waters of the U.S. within the City boundaries that are within the same watershed as the proposed project. However, like the proposed project, these cumulative projects would each be required to comply with State and federal law and permits to restore or mitigate for impacts. This regulatory structure would reduce the incremental contribution of the proposed project to any potential cumulative impact. Therefore, the proposed project impacts would not be cumulatively significant.	contribution of the proposed project to any potential cumulative impact. Therefore, the proposed project impacts would not be cumulatively significant. The proposed project would result in a direct, permanent impact on approximately 0.001 acre of intermittent stream. Implementation of avoidance and minimization efforts and restoration/compensatory mitigation described in **Mitigation Measure BIO-3** would reduce the proposed project-specific impacts to a less than significant level**.** Cumulative projects described in **Table 3.6-1** could potentially impact wetlands or Waters of the U.S. within the City boundaries that are within the same watershed as the proposed project. However, like the proposed project, these cumulative projects would each be required to comply with State and federal law and permits to restore or mitigate for impacts. This regulatory structure would reduce the incremental contribution of the proposed project to any potential cumulative impact. Therefore, the proposed project impacts would not be cumulatively significant.	
The proposed Greater Wildfire Evacuation Plan, being prepared by the El Dorado CTC, identifies Clay Street as a location of concern for evacuation and circulation during an emergency because of the condition of the Clay Street Bridge as well as the width of the existing Clay Street Bridge, which is narrower than the existing roadway width to the north and south of the bridge. The proposed project would help to eliminate this area of concern by replacing the bridge to conform to existing roadway width north and south of Hangtown Creek. Therefore, the proposed project would not conflict with the proposed Greater Wildfire Evacuation Plan but would rather eliminate the concern of a bottleneck at the Clay Street Bridge due to its narrow width and one-lane use. This is a beneficial impact for emergency access.	The Greater Placerville Wildfire Evacuation Preparedness, Community Safety, and Resilience Study (2024), prepared by the El Dorado County Transportation Commission, identifies Clay Street as a high priority location of concern for evacuation and circulation during an emergency because of the condition of the Clay Street Bridge as well as the width of the existing Clay Street Bridge, which is narrower than the existing roadway width to the north and south of the bridge. The proposed project would help to eliminate this area of concern by replacing the bridge to conform to existing roadway width north and south of Hangtown Creek. Therefore, the proposed project would not conflict with the Greater Placerville Wildfire Evacuation Preparedness Study, but rather, would eliminate the concern of a bottleneck at the Clay Street Bridge due to its narrow width and one-lane use. This is a beneficial impact for emergency access	REIR Section 4.10.5, Threshold d, third paragraph

7.3 Response to Comments

7.3.1 Global Comments

This section provides master responses to comments raised in multiple comment letters on the REIR. The master responses address comments related to general concerns that are common throughout several comment letters. The intent of a global response is to provide a comprehensive response to an issue so that all aspects of the common public and agency concerns are addressed in a coordinated, organized manner in one location. This reduces repetition of responses. When an individual comment raises a concern discussed in a global response, the response to the individual comment includes a cross reference to the appropriate global response. For example, if a comment identifies a question pertaining to project documents that were included in the processing of the REIR, the response will include a statement such as, “Please see Global Response 1.” Individual responses to each unique comment follow the global responses.

7.3.1.1 Global Response 1: Existing Bridge Condition, Proposed Bridge Replacement and Project Objectives

The City received several comments questioning the condition of the existing Clay Street Bridge, the need for its replacement, whether rehabilitation or continued use of the existing bridge would be appropriate, and whether the proposed project would achieve its stated objectives. Some commenters note that the bridge remains in service and question whether its existing condition warrants complete replacement. Others express concern that replacement of the bridge and associated roadway improvements may create impacts that outweigh the benefits of the proposed project. The City acknowledges these concerns. As discussed below, the decision to pursue replacement is based on the combination of the bridge age, structural condition, geometric and functional deficiencies, pedestrian and bicycle deficiencies, current design requirements, access, circulation, and evacuation route deficiencies, and engineering feasibility of modifying the existing structure; it is not based solely on the bridge’s eligibility for federal replacement funding.

The existing Clay Street Bridge is an earth-filled, closed-spandrel concrete arch structure approximately 32 feet long and 19 feet wide. It provides approximately 17 feet of clear width between two substandard concrete barriers and accommodates a single lane of two-way vehicular and bicycle traffic. A narrow, at-grade sidewalk is located along the west side of the bridge. The existing bridge therefore creates a constrained single-lane crossing within an otherwise two-lane roadway system and does not provide standard pedestrian and bicycle facilities.

The condition of the bridge has been evaluated through the California Department of Transportation (Caltrans) bridge inspections as well as supplemental investigations conducted specifically for the proposed project. As documented in the REIR, the bridge received a Sufficiency Rating of 52.6 in 2020, compared with 62.6 in 2016. The REIR

also notes the bridge's age, deterioration of the concrete railings, and undermining of slope protection near the abutment. The City conducted supplemental structural testing in 2023 to obtain additional information regarding concrete strength, reinforcement, and structural fill because as-built plans for the bridge are not available. That investigation found variable concrete strengths and determined that portions of the earthen fill were moist, poorly compacted, and contained decomposed slate and organic material and were not providing structural strength to the bridge (see Section 3.2 Proposed Project Setting).

The subsequent Type Selection Report (2025) incorporated the most recent available Caltrans inspection information. The July 13, 2024 Bridge Inspection Report assigns the bridge a Sufficiency Rating of 57.6 and documents concrete spalling, vertical cracking, and undermining of the footings due to erosion from Hangtown Creek. The Type Selection Report further notes settlement at the sidewalk near the south abutment, that the existing barriers do not meet current crash-testing standards, and that the approach sidewalks are discontinuous across the bridge. The report concludes that the existing crossing does not provide adequate multimodal connections between Main Street, the El Dorado Trail, and residential areas north of the bridge.

The existing bridge also does not meet current hydraulic design criteria. The bridge provides insufficient hydraulic openings and inadequate freeboard during major storm events, increasing its vulnerability during high flows. Current bridge design standards require structures to safely convey design flood events while maintaining adequate freeboard above anticipated water surface elevations.

The existing bridge is not proposed for replacement simply because it is old, because it has received a particular numerical condition rating, or because federal Highway Bridge Program funding is available. The REIR acknowledges that the bridge qualifies for rehabilitation under applicable Highway Bridge Program criteria. However, bringing the existing structure into compliance with current roadway, bridge, pedestrian, bicycle, Americans with Disabilities Act (ADA), and safety requirements would require substantial modification and widening of the approximately 100-year-old structure. The City determined that full replacement is the most feasible means of addressing these combined deficiencies, and Caltrans Structures Local Assistance concurred with the replacement option.

The proposed replacement bridge is intended to correct these deficiencies while providing a safe and functional crossing that meets current standards. As described in Section 3.4 Proposed Project of the REIR, the new bridge would be approximately 37 feet long and at least 40 feet wide, accommodate two travel lanes, provide sidewalks on both sides, and accommodate bicyclists through a Class III bicycle facility. The bridge barriers would meet current safety standards and incorporate architectural treatments intended to complement the surrounding downtown historic character. The pedestrian and bicycle improvements would also provide a more direct and continuous connection between Main Street, the El Dorado Trail, and neighborhoods north of Hangtown Creek. The Type Selection Report confirms that the replacement structure would be designed

pursuant to applicable AASHTO and Caltrans structural, seismic, and roadway design criteria.

The bridge replacement is also part of a broader set of improvements intended to address existing transportation circulation, access, evacuation and safety conditions within the proposed project area. The REIR identifies existing conflicts associated with the closely spaced Main Street/Clay Street and Main Street/Cedar Ravine Road intersections, including vehicle collisions, congestion, uncontrolled pedestrian crossings, and bicycle and pedestrian near-miss incidents. The proposed four-way intersection would consolidate the two closely spaced intersections, while the replacement bridge would allow two-way traffic to cross Hangtown Creek simultaneously. The Section 4.6 Hazards and Hazardous Resource and Section 4.10 Transportation and Traffic of the REIR concludes that these improvements would reduce vehicle conflicts and improve emergency response because fire trucks and other emergency vehicles would no longer have to wait for opposing vehicles to clear the single-lane bridge.

These improvements directly relate to the five project objectives identified in Section 3.3 of the REIR: (A) address safety, functionality, and structural deficiencies of the Hangtown Creek crossing in accordance with modern bridge and roadway engineering standards; (B) improve roadway public safety, traffic operations, and first-responder access; (C) improve pedestrian and bicycle access and safety; (D) minimize impacts to adjacent properties; and (E) preserve and retain the existing overall historic character.

With respect to pedestrian and bicycle safety, the proposed project would replace the existing narrow at-grade sidewalk on one side of the street with standard sidewalks on both sides of the street, provide ADA-compliant curb ramps and crosswalks, and establish a Class III bicycle connection between the El Dorado Trail and Main Street.

Providing sidewalks on both sides of the replacement Clay Street Bridge is consistent with the City's adopted goals and policies for improving pedestrian safety and connectivity. Specifically, the City of Placerville General Plan, Transportation Element, Goal F calls for the City "[t]o promote convenient and safe pedestrian circulation," with Policies F-3 and F-4 supporting construction of sidewalks that connect major pedestrian destinations. The 2007 Pedestrian Circulation Plan further establishes goals to "repair and upgrade the existing system of sidewalks," "close gaps to increase the connectivity and viability of [the] existing system," and "expand the system to provide greater opportunities to pedestrians." Because replacement of the Clay Street Bridge represents a long-term capital investment and a rare opportunity to establish the permanent roadway cross-section, providing sidewalks on both sides implements these adopted City objectives by providing a complete pedestrian connection, reducing unnecessary roadway crossings, and avoiding a long-term constraint on future pedestrian connectivity.

These improvements directly further implement Objective C and address deficiencies that cannot be resolved simply by maintaining the existing bridge in its current configuration.

The City also recognizes that accomplishing the proposed project's structural, functional, and safety objectives results in environmental tradeoffs. The REIR does not conclude that replacement of the existing bridge would be without adverse environmental effects. Replacement of the historic Clay Street Bridge and relocation of the Druid Monument would result in significant and unavoidable impacts to historical resources. Those effects are expressly disclosed in Section 4.4.7 Cultural Resources Project Impacts of the REIR and were considered in the development and evaluation of alternatives. The objective to "preserve and retain the existing overall historic character" does not mean that every individual historical feature would remain physically unchanged. The REIR acknowledges that significant effects to individual historical resources would occur; however, the proposed project would retain the overall historic character of the surrounding area by having a design that incorporates context-sensitive architectural treatments intended to further this objective. The replacement bridge barriers would include architectural aesthetic treatments compatible with the surrounding downtown historic area. These features are intended to visually integrate the replacement structure with its historic setting while allowing the new bridge to satisfy contemporary structural and safety requirements.

The existing bridge is not in imminent danger of collapse to establish the need for the proposed project; rather, the proposed replacement responds to the combined condition, age, structural and geometric limitations, single-lane configuration, substandard barriers and pedestrian facilities, multimodal deficiencies, circulation and evacuation deficiencies and limitations on feasible rehabilitation of the existing bridge in order to meet the outlined objectives for the proposed project. The proposed project would replace those facilities with a two-lane crossing designed to current structural and geometric standards, improve pedestrian, bicycle, vehicular, and emergency access, minimize impacts to adjacent properties to the extent feasible, and incorporate context-sensitive design treatments intended to retain the overall historic character of the project area. These considerations support the City's determination that the proposed project would meet the objectives identified in Section 3.3 Project Objectives of the REIR.

7.3.1.2 Global Response 2: Bridge Replacement vs. Rehabilitation

Several commenters questioned the need to replace the existing Clay Street Bridge and suggested that rehabilitation, repair, or modification of the existing structure could address its deficiencies while avoiding or reducing the environmental and historic resource impacts associated with demolition and replacement. The City evaluated rehabilitation of the existing Clay Street Bridge as a potential alternative to replacement. As discussed in Section 6.5.2 Clay Street Bridge Rehabilitation of the REIR, rehabilitation was determined to be neither a technologically viable nor economically feasible alternative because it would not adequately address the bridge's structural, operational, geometric, hydraulic, and multimodal deficiencies while meeting current engineering and safety standards. The existing Clay Street Bridge is an earth-filled, closed-spandrel concrete arch structure approximately 32 feet long and 19 feet wide. It provides approximately 17 feet of clear width between two substandard concrete

barriers and accommodates a single lane of two-way vehicular and bicycle traffic. Although historically common, this bridge type cannot be practically widened or upgraded to satisfy current Caltrans and American Association of State Highway and Transportation Officials (AASHTO) design standards without extensive reconstruction of the structure. The City conducted supplemental structural testing in 2023 to obtain additional information regarding concrete strength, reinforcement, and structural fill because as-built plans for the bridge are not available. That investigation found variable concrete strengths and determined that portions of the earthen fill were moist, poorly compacted, and contained decomposed slate and organic material and were not providing structural strength to the bridge (see Section 3.2 Proposed Project Setting).

Engineering evaluations completed during preparation of the Type Selection Report (2025) further confirmed that rehabilitation would require substantially rebuilding the bridge rather than preserving it. To meet current standards, the bridge would require widening to accommodate two standard-width travel lanes, continuous ADA-compliant pedestrian facilities, Manual for Assessing Safety Hardware (MASH)-compliant crash-tested bridge barriers, and structural strengthening to support modern traffic loading and increased impact forces. These improvements would necessitate extensive modification or replacement of the bridge deck, arch structure, bridge foundations, retaining walls, and bridge barriers, fundamentally altering the existing bridge while providing a structure with a shorter remaining service life than a replacement bridge.

Rehabilitation also would not resolve the bridge's hydraulic deficiencies. The existing bridge provides an inadequate hydraulic opening and insufficient freeboard during major storm events. Compliance with current hydraulic design criteria requires a longer bridge span, improved hydraulic opening, and a slightly higher bridge profile to safely convey design flood events while maintaining adequate freeboard above anticipated water surface elevations. These improvements cannot be reasonably achieved while retaining the existing bridge structure.

In addition, the bridge is located within a highly constrained urban setting adjacent to the Cedar Ravine Culvert, utility infrastructure, the El Dorado Trail crossing, retaining walls, nearby commercial development, and closely spaced intersections. These physical constraints limit the ability to widen or rehabilitate the existing bridge while maintaining traffic operations, improving pedestrian and bicycle connectivity, and achieving the proposed project's objectives. Even rehabilitation alternatives involving a one-way bridge or retaining the existing alignment would still require substantial structural reconstruction, new crash-tested barriers, and widened pedestrian facilities, resulting in extensive alteration of the historic bridge while failing to fully address Project Objectives A, B, and C regarding operations and safety.

For these reasons, rehabilitation was determined to be infeasible based on hydraulic modeling, bridge design requirements, and supplemental structural testing. Replacement of the bridge with a new structure designed to current Caltrans and AASHTO standards is the only alternative that fully addresses the bridge's long-term structural integrity, safety, pedestrian and bicycle accessibility, hydraulic performance,

and operational deficiencies while providing a reliable crossing with a full design service life.

7.3.1.3 Global Response 3: Clay Street Realignment

Several commenters suggested that the existing Clay Street Bridge should be replaced on its current alignment rather than shifted to the east as proposed. The City evaluated replacement of the bridge on the existing alignment during project development. In addition, Section 6.4.2 of the REIR considered Alternative 2 – Clay Street Bridge Replacement/No Clay Street Realignment. Replacement on the existing alignment was determined to be infeasible because it would not adequately address multiple engineering, safety, operational, and geometric constraints while meeting current Caltrans and AASHTO design standards.

The existing bridge location presents significant physical constraints. The existing southern bridge abutment incorporates the outlet of the Cedar Ravine Culvert, which enters the bridge abutment at a pronounced skew. Reconstructing the bridge in the same location would require integrating the culvert into the new abutment, thus creating substantial structural and hydraulic design challenges, increasing construction complexity, reducing constructability, and making future inspection and maintenance efforts more difficult. Relocating the bridge to the east avoids conflict with the Cedar Ravine Culvert and allows construction of a structurally and hydraulically effective bridge that meets current Caltrans and AASHTO design standards.

Replacement along the existing alignment would also create roadway design deficiencies. The Clay Street Bridge must be widened and the roadway profile raised to satisfy current structural, hydraulic, and safety standards. On the existing alignment, this would result in inadequate sight distance at the adjacent private driveway on the southwest corner of the bridge. Re-grading the driveway is not feasible because of the proximity of an existing building.

The existing bridge location also cannot accommodate an appropriate transition to Main Street. The limited distance between the bridge and the existing Main Street/Clay Street intersection is insufficient to safely transition the wider bridge back to the existing roadway while meeting applicable Caltrans and AASHTO design standards. Constructing a new intersection at Main Street/Clay Street so near the existing Main Street/Cedar Ravine Road intersection would create closely spaced intersections that would increase turning conflicts, reduce acceptable gaps for left-turn movements, contribute to longer traffic queues, and adversely affect traffic operations, including emergency response. Consolidating Clay Street into the existing Main Street/Cedar Ravine Road intersection eliminates these operational deficiencies and improves overall intersection function as discussed in Section 4.10 Transportation and Traffic of the REIR.

Commenters questioned if keeping Clay Street on the current alignment would reduce or eliminate the impacts to the parking lot and creekside viewing area. Engineering evaluation further determined that many of the project impacts identified by commenters

would occur regardless of whether the bridge remained on its existing alignment. Because the replacement bridge must meet current Caltrans and AASHTO standards, roadway widening, reconstruction of retaining walls, modifications to the adjacent parking lot, and changes to the creekside viewing area would still be necessary even if the bridge were reconstructed in its current location. Accordingly, retaining the existing alignment would not avoid conflicts with the parking lot and creekside viewing area and would introduce additional engineering and operational constraints, as discussed above.

The project objectives include correcting the structural deficiencies of the existing bridge, improving roadway safety and traffic operations, improving access for pedestrians, bicyclists, and emergency responders, minimizing impacts to adjacent properties, and preserving the historic character of the area. As evaluated in Section 6.4.2 Alternative 2 of the REIR, Alternative 2 would only partially achieve these objectives (see REIR Section 6.4.2.2 Conclusion). However, the project's proposed realignment best satisfies these objectives by providing a safe, functional, and code-compliant bridge that meets current Caltrans and AASHTO design standards while avoiding the significant engineering, operational, and safety constraints associated with replacement on the existing alignment, as discussed throughout the REIR and in Global Response -1, above.

7.3.1.4 Global Response 4: Historic Character, Visual Quality, and Bridge Architecture

The City received comments expressing concern that the proposed project, particularly replacement of the existing Clay Street Bridge, could diminish the historic character and visual quality of downtown Placerville. Some commenters also expressed concern that the replacement bridge could appear too modern or inconsistent with the historic setting. The City acknowledges the importance of the visual and historic character of the project area and has considered these issues in both the REIR and subsequent bridge design development.

The project site is located at the eastern edge of downtown Placerville, within an area characterized by a combination of historic buildings, modern development, transportation infrastructure, Hangtown Creek, riparian vegetation, and prominent community landmarks. Section 4.1 Aesthetics of the REIR describes the regional landscape as having a rural, small-town, and historic character and recognizes that historic buildings along Main Street, the Druid Monument, and other landmarks contribute to the visual identity of downtown Placerville. At the project site itself, the visual environment includes the existing Clay Street Bridge, Main Street, Cedar Ravine Road, the Ivy House parking lot, the Druid Monument, the El Dorado Trail, Hangtown Creek and its riparian corridor, surrounding commercial buildings, overhead utilities, and other existing hardscape.

The aesthetics analysis evaluates visual quality in terms of vividness, intactness, and unity and considers existing visual conditions, sensitive viewers, the magnitude of the proposed visual change, and consistency with applicable visual-resource policies (REIR

Section 4.1 Aesthetics). The analysis therefore considers the replacement bridge as one component of the broader visual setting rather than evaluating the bridge in isolation.

The existing bridge itself contributes to the visual setting. The REIR identifies the bridge as a unifying feature in one of the key views because it visually connects the riparian vegetation along Hangtown Creek with the landscaping and development near Main Street. At the same time, the REIR notes that the project site also contains visually intrusive or modern elements, including parking areas, overhead utilities, roadway infrastructure, and U.S. Highway 50 (US 50). Accordingly, the existing visual setting is not an intact nineteenth-century streetscape, but rather a mixed historic and contemporary environment at the edge of downtown.

The proposed project would modify this setting by replacing the existing bridge, realigning a portion of Clay Street, changing the intersections and parking areas, providing landscaping improvements, and all other improvements listed in Section 3.4 Proposed Project. The REIR does not assume that these changes would be visually imperceptible. Rather, Section 4.1 Aesthetics of the REIR evaluates the magnitude of the resulting visual change and incorporates design and mitigation measures intended to integrate the proposed project with the surrounding historic environment.

One of the stated project objectives (Objective E, Section 3.3 of the REIR) is to "preserve and retain the existing overall historic character." Consistent with Objective E, the project description requires the replacement bridge barrier to incorporate an architectural aesthetic treatment intended to match the surrounding area and downtown historic character. The conceptual bridge renderings included in Section 4.1 of the REIR illustrate the anticipated scale and general appearance of the proposed improvements; however, the REIR expressly identifies these renderings as conceptual and for illustrative purposes only. Thus, they are not intended to establish the final bridge railing design, architectural pattern, color, texture, or finish. Following environmental review and approval of the proposed project, the specific aesthetic treatments, details, color pallets, and material selections will be considered for the bridge during the project plans and contract specifications (PS&E) stage. These elements would be presented and discussed at a public meeting prior to finalization, providing the public with an opportunity to review and comment on proposed architectural treatments before they are incorporated into the final construction documents, as detailed in the revised Mitigation Measure AES-1.

Mitigation Measure AES-1: The specific aesthetic treatments, details, color pallets and material selections will be considered for the proposed project during the PS&E stage. These elements would be presented and discussed at a public meeting prior to finalization, providing the public with an opportunity to review and comment on proposed architectural treatments before they are incorporated into the final construction documents. After the meeting, the project shall incorporate the following streetscape and landscape design concepts:

- Low planter walls shall be placed along the Main Street and Clay Street edges of the reconfigured Ivy House parking lot in the same style as other surrounding rock wall features and to offer informal and temporary seating opportunities.
- Tree species as identified in Appendix A of the Main Street Streetscape Design Development Plan (incense cedar, tulip tree, valley oak, red oak, and Chinese pistache) shall be planted along Main Street in areas where ample room is supplied to define public space along the street and adjacent to parking lots to provide shade.
- Accent planting in large planting beds shall be provided adjacent to the reconfigured Ivy House parking lot.
- New streetlights installed as part of the project shall have period-appropriate cast iron light pole standards and must meet applicable energy standards and City lighting specifications for safety of public roadways as set forth in Chapter XII, Section B, of the City's Development Guide.

The REIR also includes streetscape and landscape treatments intended to reinforce the visual character of the surrounding area (Section 4.1 Aesthetics). Mitigation Measure AES-1 includes design concepts such as low planter walls consistent with surrounding rock-wall features, street trees, and accent landscaping associated with the reconfigured Ivy House parking lot. The REIR also evaluated the proposed project for consistency with the City's Main Street Streetscape Design Development Plan and Development Guide, which emphasize preservation and enhancement of downtown historic character, pedestrian-oriented design, distinctive streetscape elements, landscaping, and visual landmarks. The REIR concludes that the bridge replacement would incorporate aesthetics into the design and would be consistent with these adopted design policies.

The cultural resources analysis similarly considers the proposed project in the context of the assumed-eligible Placerville Main Street Historic District. The existing bridge is assumed to contribute to the assumed-eligible Placerville Main Street Historic District because of its age and transportation function. Section 4.4.7 Cultural Resources Project Impacts of the REIR analyzes proposed project impacts to cultural resources. In Section 4.4.7 Cultural Resources Project Impacts, Threshold A, the analysis concludes that replacement of the bridge and associated Clay Street realignment would not substantially alter the broader character-defining qualities of the assumed-eligible historic district, including its irregular street pattern, parcel configuration, and orientation of buildings along Main Street. This conclusion does not mean that removal of the existing bridge itself has no historic-resource effect; rather, REIR Section 4.4.7 Cultural Resources Project Impacts, Threshold A, separately identifies the loss of the bridge as a significant and unavoidable impact to the individual historical resource.

The proposed Hangtown Creek retaining walls would also receive architectural treatment intended to blend with existing conditions. REIR Section 4.4.7 Cultural Resources Project Impacts, Threshold A, specifies that reconstructed retaining wall

segments would be faced with an aesthetic treatment intended to mimic the appearance of the existing wall. This treatment is intended to visually tie new construction into the existing creek corridor and broader character of the assumed-eligible historic district rather than introduce untreated contemporary concrete surfaces.

The Type Selection Report (2025) provides additional detail regarding the architectural approach to the replacement bridge. Because Main Street retains a strong Gold Rush-era historic context, the Type Selection Report identifies aesthetic treatment of the proposed bridge as an important design consideration. The Type Selection Report also identifies opportunities to apply architectural formliners and staining to the bridge barrier railings, abutments, wingwalls, and retaining walls. Accordingly, the proposed project has established a commitment to context-sensitive architectural treatment, while preserving flexibility to refine the specific colors, textures, patterns, and finishes during final design.

The architectural treatment of the replacement bridge therefore has two related objectives: the structure must satisfy current structural, crash-safety, pedestrian, and ADA-accessibility requirements, while its visible architectural elements are designed to be compatible with the historic setting of downtown Placerville. The intent is not to create a false historic reproduction of the existing bridge, but to use scale, railing form, texture, staining, retaining-wall treatment, landscaping, and other streetscape elements to visually integrate the replacement structure with the existing environment.

The City recognizes that aesthetic preferences are inherently subjective and that some viewers may prefer retention of the existing bridge or a different architectural approach. However, the REIR evaluates visual change under the applicable CEQA methodology and incorporates mitigation and design measures intended to maintain the visual cohesion and historic character of the project area (Sections 4.1 Aesthetics and 4.4 Cultural Resources of the REIR).

Although the replacement bridge would introduce a new structure into the project area, the proposed project has been developed with consideration of the historic and visual character of downtown Placerville. The final bridge railing, retaining walls, architectural formliners, staining colors, textures, and related aesthetic treatments will be refined during final design, consistent with the commitments contained in the REIR, as well as the City's Main Street Streetscape Design Development Plan and Development Guide.

7.3.1.5 Global Response 5: Clay Street Bridge and Druid Monument Impacts, Mitigation, and Section 106

The City received numerous comments regarding the historical significance of the existing Clay Street Bridge and Druid Monument, the effects of the proposed project on these resources, the adequacy of implementing mitigation measures, and the continuation of the Section 106 process as the proposed project advances. The City recognizes that both resources are important components of Placerville's historical setting. The history and significance of these resources, the proposed project's effects,

and the measures developed to address those effects are discussed in detail in Section 4.4 of the REIR.

The existing Clay Street Bridge is a one-lane, earth-filled, closed-spandrel reinforced-concrete arch bridge constructed circa 1926. As discussed in Section 4.4.3 Cultural Resource Environmental Setting of the REIR, its character-defining features include the bridge substructure and superstructure, including its abutments, arch, wingwalls, spandrel walls, deck, railings, approaches, and concrete materials. The bridge was determined individually ineligible for listing in the National Register of Historic Places (NRHP) through the Section 106 process, including reevaluation using the corrected circa-1926 construction date and concurrence by the State Historic Preservation Officer (SHPO). For purposes of CEQA, however, the bridge was subsequently determined eligible for listing in the California Register of Historical Resources (CRHR) at the local level, including as the last remaining local bridge of its type, period, and method of construction. The bridge is also treated as a contributor to the assumed-eligible Placerville Main Street Historic District because of its association with the City's transportation development.

Section 4.4.3 of the REIR also provides the history and significance of the Druid Monument. The monument was erected in 1926 by the United Ancient Order of Druids (UAOD) to commemorate Frederick Sieg, who founded the first California Druid Grove in Placerville in 1859. Designed by architect J. A. Porporato, the monument was intentionally placed within the Main Street/Cedar Ravine Road intersection, where its prominent location became an important component of its historic character. The monument historically functioned both as a commemorative landmark and as a traffic-regulating or traffic-calming feature. In 2020, SHPO determined the Druid Monument eligible for listing in the NRHP under Criteria A and C and Criterion Consideration F. Its significance is associated with the development of traffic control in downtown Placerville, its design by Porporato, and its commemorative association with Frederick Sieg and the history of the Druid organization in California. The Druid Monument is included in the "City Historic Resources" list (Placerville 2021). It is identified as a historic monument under Section 8-16-1 (Monuments) of the City Code, and is, therefore, a historical resource as defined by CEQA Guidelines Section 15064.5(a).

As evaluated under Section 4.4.7 Cultural Resources Project Impacts, Threshold A, the REIR acknowledges that implementation of the proposed project would result in substantial changes to both resources. Demolition of the Clay Street Bridge would destroy physical characteristics conveying its historical significance and therefore it would constitute a significant adverse impact to a historical resource under CEQA. The proposed project would also relocate the Druid Monument approximately 45 feet west of its current location within the Main Street/Cedar Ravine Road intersection. Although the monument would remain within the intersection and retain its general association with the transportation network, relocation would alter its historic location and its original function as a traffic-calming feature. The REIR therefore determines that relocation of the Druid Monument would result in a significant adverse impact to the historical resource.

Section 4.4.7 Cultural Resources Project Impacts identifies Mitigation Measures CUL-1 through CUL-3 to reduce, document, and otherwise address effects to historical resources. Mitigation Measure CUL-1 requires documentation of the Clay Street Bridge prior to its removal consistent with Historic American Engineering Record (HAER) Level II standards. The documentation includes measured drawings, large-format archival photographs showing the bridge in context and documenting its significant engineering features, and written historical information. Copies would be deposited with appropriate historical repositories and made available to identified interested parties.

Mitigation Measure CUL-2 establishes extensive requirements for treatment of the Druid Monument. Before dismantling or relocation, the monument must be documented in accordance with Historic American Buildings Survey (HABS) Level II standards, including measured drawings, large-format photography, and written historical documentation. Following completion of the HABS documentation, a professional qualified in the reconstruction and relocation of similar historic properties must prepare a detailed plan governing the monument's dismantling, storage, relocation, and reinstallation. The plan must also evaluate the Cedar Ravine Culvert underlying the monument and establish procedures for temporary stabilization if the culvert could pose a risk during dismantling. The qualified professional is required to oversee the dismantling and reinstallation process.

Mitigation Measure CUL-2 also requires continued recognition and interpretation of the Druid Monument following relocation. The UAOD will be invited to observe the relocation and to rededicate the monument in its new location. The monument's illuminated torch will be maintained, protective bollards will be installed, and interpretive signage will explain the monument's original location, the reason for its relocation, its significance to the Druid organization, and its NRHP status. A qualified historian or architectural historian will also update public educational materials concerning the monument, with interested parties provided an opportunity to review the interpretive material. A monument specialist experienced with large historically significant monuments will oversee the removal, storage, and relocation to minimize the potential for physical damage.

Mitigation Measure CUL-3 addresses the potential for construction vibration to affect nearby historic buildings within the assumed-eligible Placerville Main Street Historic District. As described in Section 4.4.7 Cultural Resources Project Impacts of the REIR, vibration monitoring will be required during construction. If established vibration thresholds are exceeded, work must stop and alternative construction methods must be implemented to prevent damage to nearby historical resources.

Although these mitigation measures reduce and manage the proposed project's effects, they cannot fully eliminate the loss of the existing bridge or the change in the Druid Monument's historic location and function. REIR Section 4.4.7 Cultural Resources Project Impacts and Section 5.12 Significant Environmental Effects that Cannot be Avoided conclude that removal of the Clay Street Bridge and relocation of the Druid Monument would remain significant and unavoidable cultural resource impacts under CEQA after the implementation of mitigation measures. The REIR separately concludes

that the proposed project would not substantially diminish the character-defining elements of the assumed-eligible Placerville Main Street Historic District as a whole because the predominant themes and features associated with transportation, settlement, architecture, commerce, government, and monuments would remain evident following mitigation measure implementation.

In addition to the CEQA process documented in the REIR, the proposed project is subject to Section 106 of the National Historic Preservation Act (Section 106) because of its federal involvement (primarily funded with federal aid). As discussed in REIR Section 4.4.5.1, Section 106 requires federal agencies, including agencies funding or approving an undertaking, to consider effects on properties listed in or eligible for the NRHP and to provide SHPO, consulting parties, and other applicable participants an opportunity to participate in resolving adverse effects.

The proposed project's Section 106 process has included preparation of the Historic Property Survey Report (HPSR), Historical Resources Evaluation Report (HRER), Archaeological Survey Report (ASR), Extended Phase I Report, Finding of Adverse Effect (FOAE), and a project-specific Programmatic Agreement (PA) and Cultural Resources Management Plan (CRMP), as summarized in Sections 4.4.4 through 4.4.6 of the REIR and listed in Appendix F. The FOAE was approved by Caltrans and submitted to SHPO, which concurred with the finding in August 2021. Consulting parties were subsequently provided the project-specific PA and CRMP.

Section 4.4.4.1 Tribal and Interested Parties Consultation describes Tribal and interested parties' consultation efforts conducted throughout project development. The UAOD, for example, provided comments regarding removal, storage, protection, and reinstallation of the Druid Monument and requested continued participation in decisions concerning the monument. The City, its consultants, Caltrans, and representatives of the Druids subsequently met to discuss these issues, and the UAOD was advised that it would continue to receive notification throughout through final design and construction.

Certification of the Final EIR does not terminate the proposed project's cultural resource responsibilities. As the proposed project proceeds through final design and construction, the City and Caltrans will continue to implement the requirements and commitments established through the project-specific PA and CRMP, applicable REIR mitigation measures, and the Section 106 process. These requirements provide a framework for continued consultation and for the documentation, protection, monitoring, relocation, and treatment of cultural resources as the project advances.

Accordingly, the City recognizes that the proposed project would permanently alter the Clay Street Bridge and Druid Monument and that these effects would remain significant and unavoidable under CEQA. These impacts have been expressly disclosed in the REIR Section 4.4 Cultural Resources rather than minimized or disregarded. Mitigation measures have been developed to document, protect, interpret, and appropriately treat the affected resources to the extent feasible, and the Section 106 process provides an additional framework for continued consultation and implementation of cultural resource commitments as the proposed project proceeds.

7.3.1.6 Global Response 6: Final Design and Final Landscaping Details

Several commenters requested additional information regarding features that have not yet been finalized, including retaining wall dimensions and treatments, bridge architectural details, roadway striping and signing, drainage features, lighting, landscaping, planting plans, tree species and locations, irrigation, and amenities associated with the relocated creekside viewing area. Other commenters expressed concern that the conceptual plans and renderings do not provide enough detail to determine precisely how the completed project will appear. The City acknowledges these concerns.

The proposed project is currently at the preliminary engineering stage. The fundamental components of the proposed project have been sufficiently defined for environmental review, including replacement of the existing Clay Street Bridge; the Clay Street roadway alignment; the general bridge configuration and dimensions; the Main Street/Cedar Ravine Road/Clay Street intersection configuration; pedestrian and bicycle facilities; reconfiguration of the Ivy House parking lot; retaining walls; relocation of the creekside viewing area; and the general extent of associated improvements. The REIR evaluates the reasonably foreseeable environmental effects of these components based on the level of design available during environmental review. As the proposed project advances through the PS&E phase, more detailed engineering and architectural elements will be developed and finalized, including structural components, retaining wall configurations, architectural and aesthetic treatments, landscaping, drainage, utilities, traffic control, fencing, lighting, signing and striping, and other construction details.

This approach is consistent with the level of project development contemplated by CEQA. CEQA Guidelines Section 15146 provides that “[t]he degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.” Accordingly, an EIR prepared while a public infrastructure project is undergoing preliminary engineering is not required to contain the same level of detail that will ultimately appear in final PS&E documents. The relevant issue for CEQA is whether the proposed project has been described with sufficient specificity to identify and evaluate its reasonably foreseeable environmental effects, rather than whether every engineering and architectural detail has been completed.

CEQA Guidelines Section 15004(b) also directs environmental review to occur “as early as feasible in the planning process” so that environmental considerations can influence project planning and design. Completing all detailed engineering before environmental review would risk making design commitments before the environmental analyses, mitigation measures, agency consultations, alternatives analyses, and public-review processes have been completed. The progression from preliminary design through environmental review and then into detailed PS&E therefore allows environmental requirements and mitigation commitments established through the REIR to be incorporated into final design.

The distinction between preliminary and final design does not mean that fundamental project decisions remain undefined. Rather, the REIR establishes the proposed project that is being environmentally reviewed, while PS&E translates that proposed project into detailed construction plans and specifications. Final design refinements must remain consistent with the proposed project evaluated in the REIR, the adopted mitigation measures, applicable permits, project objectives, engineering and safety standards, and applicable historic-resource commitments while complying with federal, state, and local requirements and design standards

Final lane geometry, curb details, pavement markings, signing, striping, and similar features will continue to be refined during PS&E. Similarly, retaining walls are established project components, but final wall heights, structural details, finishes, and architectural treatments will continue to be developed during final design. Opportunities to refine wall heights through grading and site-specific design and to incorporate architectural treatments compatible with the surrounding setting, compliant with the REIR, as well as the City's Main Street Streetscape Design Development Plan and Development Guide, will be assessed during PS&E.

Architectural treatments for the replacement bridge will likewise be refined during PS&E. The REIR and subsequent Type Selection Report establish commitments to include context-sensitive design, while allowing further development of elements such as bridge railings, architectural formliners, staining, textures, abutment and wingwall treatments, and retaining wall finishes. Thus, conceptual illustrations in the REIR are intended to communicate the general scale, massing, and character of the proposed project rather than represent final construction drawings (REIR Section 4.1.5, Threshold C).

Landscape design is similarly developed at progressively greater levels of detail. Section 3.4 and Section 4.1 of the REIR establish landscape and streetscape improvements as components of the proposed project, while Mitigation Measure AES-1 establishes the applicable landscape and streetscape framework. Mitigation Measure AES-1 includes concepts consistent with the City of Placerville Main Street Streetscape Design Development Plan and City Development Guide, including low planter walls, street trees, accent planting, and period-appropriate streetscape treatments. The proposed project also identifies preservation of the mature cork oak and landscaping along Main Street as components of the proposed improvements.

The REIR does not, however, establish a final planting plan. The precise species, number, size, and location of trees, shrubs, groundcover, and other landscape features will be determined during PS&E. Final landscape design will consider available planting areas, roadway sight distance, pedestrian and ADA circulation, utilities, drainage and hydraulic facilities, parking configuration, maintenance, biological-resource requirements, and compatibility with the surrounding historic and creek corridor setting.

It is also important to distinguish streetscape landscaping from restoration of native riparian habitat. Mitigation Measure AES-1 addresses streetscape landscaping, while restoration and mitigation of affected riparian vegetation are governed by the biological-resource requirements in Section 4.3 of the REIR, including Mitigation Measure BIO-3

(formerly Mitigation Measure BIO-5 in the REIR). Thus, plant species suitable for streetscape areas are not necessarily the same species that would be used to restore disturbed portions of the Hangtown Creek riparian corridor.

Landscape design will also address the reconfigured Ivy House parking lot and relocated creekside viewing area. The proposed project includes landscaping and irrigation, and the relocated viewing area would be revegetated and landscaped in accordance with applicable City requirements and Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR). The general location and function of the viewing area have been established, including ADA-accessible connection to the El Dorado Trail; however, detailed amenities such as landscaping, features, materials, irrigation, and other aesthetic treatments will be refined during PS&E.

After proposed project approval, the City intends to conduct an aesthetics-focused public workshop to solicit input concerning the relocated creekside viewing area and other detailed aesthetic features. Comments concerning plant selection, landscaping treatments, bridge and retaining wall finishes, and similar aesthetic details may therefore inform development of the final design, provided that the resulting refinements fit within the approved project funding, and remain consistent with the proposed project evaluated in the REIR and applicable mitigation measures, engineering, environmental, and historic-resource requirements.

7.3.1.7 Global Response 7: Comment Does Not Raise Issues with REIR Adequacy

The City received several comments that do not raise issues with the adequacy of the REIR. The comments have been noted and are acknowledged. No response is required because the comment does not raise a specific issue regarding the adequacy of the REIR or identify substantial new information requiring revision to the environmental analysis. Although no revisions to the REIR are warranted in response to this comment, the comment will be included in the administrative record and considered by the City Council, along with all other public comments, during its deliberations prior to making a decision on project approval (14 Cal. Code Regs, 15088(c)).

7.3.2 Federal Agencies

As of the time of the Final EIR publication, no federal agency comments had been received by the City.

7.3.3 State Agencies

The Central Valley Regional Water Quality Control Board was the only state agency to provide a comment letter during the REIR public review period that ended on XXXX.

7.3.3.1 State Agency Comment Letter SA1: Central Valley Regional Water Quality Control Boad

Letter SA 1

CALIFORNIA Water Boards

GAVIN NEWSOM
GOVERNOR

YANA GARCIA
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

12 March 2024

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COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, CLAY STREET BRIDGE (25C-0117) REPLACEMENT PROJECT, SCH#2014082024, EL DORADO COUNTY

Pursuant to the State Clearinghouse's 26 January 2024 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the Clay Street Bridge (25C-0117) Replacement 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.

I. Regulatory Setting

SA 1-1

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

SA 1-1

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

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

SA 1-2

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), 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. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE 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 may 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. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

SA 1-2

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

SA 1-2

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/help/permit/

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter Minkel
Peter Minkel
Engineering Geologist

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

Response to State Comment Letter SA1 Central Valley Regional Water Quality Control Board

SA1-1: This comment discusses the requirements of the Central Valley Regional Water Quality Control Board in protecting the Basin Plan that the proposed project is within and requiring implementation of antidegradation considerations during project implementation. The REIR states that there will be a less-than-significant impact pertaining to conflict or obstruction of a water quality control plan or substantial groundwater management plan identified in the Basin Plan. Through the use of construction best management practices (BMPs) the proposed project would not conflict with the Basin Plan. The REIR also identifies that the existing water quality in Hangtown Creek is degraded. Development of the proposed project area has the potential to expose bare soil and potentially generate other water quality pollutants that could be exposed to precipitation and subsequent entrainment in surface runoff to Hangtown Creek. Construction activities involving soil disturbance, excavation, cutting/filling, and grading activities could result in increased erosion and sedimentation to Hangtown Creek and waters downstream. Construction materials such as asphalt, concrete, and equipment fluids could be exposed to precipitation and subsequent runoff. Construction of the entire proposed project is anticipated to take up to 12 months to complete. The proposed project is subject to Construction General Permit requirements, which requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The proposed project would comply with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit including preparing and implementing a SWPPP that identifies project-specific BMPs to protect water quality during proposed project construction. Implementation of these measures takes into consideration the implementation of antidegradation during project construction. No revision to the environmental analysis of the REIR is necessary in response to this comment.

SA1-2: This comment discusses the requirements of the proposed project to comply with the Clean Water Act Section 404 Permit, Section 401 Permit, abide by waste discharge requirements, and obtain dewatering permits, limited threat general NPDES, and NPDES permits. As described in Table 3.5-1 of the REIR, implementation of the proposed project would require applicable regulatory approvals, including a U.S. Army Corps of Engineers (USACE) Clean Water Act Section 404 Permit for impacts to waters of the United States and a Central Valley Regional Water Quality Control Board Section 401 Water Quality Certification, with permit applications prepared during final design (REIR Section 3.5, Table 3.5-1). The REIR further states that stream diversion, dewatering, and other in-water construction activities would be conducted in accordance with the requirements of the Central Valley Regional Water Quality Control Board, U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and U.S. Fish and Wildlife Service to protect water quality during construction (REIR Section 3.4.8). Compliance with applicable waste discharge requirements, NPDES permit conditions, dewatering requirements, and other federal, state, and local water quality regulations would be required as part of project implementation, and the REIR concluded that impacts related to water quality standards and waste discharge requirements would be

less than significant (REIR Section 4.7). No revision to the environmental analysis of the REIR is necessary in response to this comment.

7.3.4 Interested Parties

7.3.4.1 Comment Letter LR1: Jennifer Tucker

Letter Response 1

Jennifer Tucker
3140 Ridge Court, Placerville, CA 95667 (530) 391-8653

City of Placerville Engineering Department
3101 Center Street
Placerville, CA 95667

February 26, 2024

Dear people,

I am submitting written comments in response to the REIR for the Clay Street Bridge Replacement Project. First, thank you for eliminating the roundabout! It does not fit with the historic nature of our town. Thank you also for eliminating the bike lanes and reducing the footprint of the bridge and streets. As a former bicyclist, I found it was safer for me to occupy a lane of traffic at stop signs, rather than being less visible in the bike lane. Although I recognize that this is a small land area under CEQA Guidelines, the project does, potentially, have some negative effects on our local environment, aesthetics, and access, which can be remedied. Here are my concerns: LR1-1

1. Preserve/modify the ADA ramp to Hangtown Creek from Ivy House parking lot.

   -As a person living with disabilities, I utilize this ramp frequently to safely view the creek up close. There are very few safe, ADA accessible avenues to the creekside in Placerville.
   - the top half of the ramp could possibly be flipped to the east side, starting in the parking lot next to the existing office building. LR1-2

2. Preserve and modify the small garden next to the creek at Ivy House parking lot. (Section 3.4.3)

   --Please refer to section 2.8, table 4.8-1 etc., the City of Placerville General Plan Section V: "The City shall make every effort to protect riparian vegetation. To this end, buildings and improvements shall be set back from watercourses," etc. This would be a conflict as stated under page 25, Land Use and Planning.
   -the garden along the creek should not be filled and paved for parking.
   -removal of the garden, trees and shrubs destroys the "cohesive riparian landscape" as highlighted in Key View # 1 and 5.
   -refer to concern #3 for further details. LR1-3

3. You are missing key view #6, with existing visual quality of this key view as moderately high: the view from the bike trail, across the creek to the parking lot, and from the parking lot looking across the creek. LR1-4

-Hangtown Creek, even though it floods, and the bike trail are a treasure to us local citizens and the tourists we bring to walk the trail.
-Hangtown Creek enhances the charming character of Placerville
-inclusion of #6 view is critical for maintaining the visual appeal of this natural setting, from both the trail side and the parking lot.
-filling in the parking lot up to the edge of the creek destroys this view.
--the wall along the south side of the creek should not be built higher, as it would negatively disrupt the natural view. We don't want to look at a parking lot from the trail, and the view from the parking lot is much more appealing with the small garden and trees.

LR1-4

4. Mitigation Measure AES-1 and other references: The listed vegetation for rehabilitation of the disturbed creek sides is NOT appropriate for native riparian habitat. (tulip trees and Chinese Pistache.) Please contact the El Dorado Chapter of the California Native Plant Society. They can also recommend drought tolerant, fire-resistant vegetation for the streetscape.

LR1-5

5. Mitigation Measure BIO 5-6 – If possible, legally, remove the section "off-site by purchasing mitigation bank credits." This is not necessary, and loss of habitat can easily be mitigated through restoration within the Hangtown Creek watershed.

LR1-6

6. Table 4.3-1 and 4.3-2 – Hangtown Creek is not intermittent, it is perennial, as described in the paragraph below table 4.3-2.

LR1-7

7. Section 4.3.2.4 Animal Species – Birds and Raptors – contrary to the last paragraph, last year's bird nests are currently visible in the BSA. I have observed swallows and black phoebes nesting and feeding in this area. Additionally, I have observed hawks perch and hunt from the trees and great blue herons and egrets fish in the creek for fish, **frogs** and crayfish.

LR1-8

8. FYI, outside of the BSA, rock retaining walls from old town hall to Bedford reportedly came from Folsom Prison!

LR1-9

I hope that my comments will assist in making this a positive project for our city,

Sincerely,

Jennifer Tucker

7.3.4.2 Response to Comment Letter LR1 Jennifer Tucker

LR1-1: The commenter expresses support for revisions to the Clay Street Bridge Replacement Project, particularly the elimination of the roundabout, bicycle lanes, and reductions to the bridge and roadway footprint, which they believe align with the town's historic character and improve bicyclist safety. The commenter acknowledges that the project affects a relatively small area under CEQA Guidelines but notes that it could still result in negative impacts on the local environment, aesthetics, and access. They indicate that these concerns may be addressed through project modifications and provide additional comments outlining specific issues. The City appreciates the comment. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR1-2: The commenter requests preservation/modification of the ADA ramp to Hangtown Creek from Ivy House parking lot and suggests that the top half of the ramp be moved/flipped to the east side. As discussed in Section 3.4.3 Ivy House Parking Lot of the REIR, the current creekside viewing area overlooking Hangtown Creek at the northwest corner of the Ivy House parking lot and the path leading to the viewing area would be removed and elevated to street level and relocated north of Hangtown Creek along the El Dorado Trail. Access to the relocated viewing area will be via an ADA compliant connection from the El Dorado Trail. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR1-3: The commenter expresses concern regarding the proposed removal of the garden, trees, and shrubs adjacent to the creek near the Ivy House parking lot and recommends that the garden be preserved and modified rather than converted to parking. The commenter contends that filling and paving the garden area will conflict with the City's General Plan policies intended to protect riparian vegetation and maintain setbacks from watercourses. The commenter further states that removal of the vegetation would adversely affect the cohesive riparian landscape identified in Key Views 1 and 5 of the REIR.

The commenter is referred to Global Response 4, for a comprehensive discussion of the existing visual character of the project area, anticipated visual changes associated with the proposed project, and the landscaping and architectural treatments to be incorporated into the proposed project. In addition, as discussed in Section 4.1 Aesthetics of the REIR, the existing vegetation along Hangtown Creek contributes to the visual character of the project area. Implementation of the proposed project would alter existing views through removal of vegetation, reconfiguration of the Ivy House parking lot, construction of retaining walls, and other proposed project improvements. These changes are disclosed and evaluated in the REIR, including through the analysis of Key Views 1 and 5. The REIR does not assume that the existing visual condition would remain unchanged; rather, it evaluates the resulting visual change and identifies mitigation to reduce aesthetic effects.

With respect to the commenter's concern regarding setbacks, the City's General Plan does not establish a specific creek setback applicable to the proposed project. Section

VIII, Policy A.4 of the General Plan addresses protection of riparian habitat rather than establishing a specific numerical setback from Hangtown Creek. Although the Hangtown Creek Master Plan identifies a 15-foot setback for urban reaches of Hangtown Creek, the Master Plan calls of the establishment of such setbacks as a policy and implementation recommendation for future amendments to the General Plan and Zoning Ordinance. The City has not subsequently codified that recommendation as a mandatory creek setback.

Potential effects to riparian vegetation are separately evaluated in Section 4.3 Biological Resources of the REIR. The REIR identifies approximately 0.04 acre of impacts to Valley Foothill Riparian habitat, including removal of four white alder trees and associated understory vegetation, and requires implementation of Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR). Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR) requires preservation of riparian vegetation where feasible, establishment of tree protection zones, and compensation for permanent impacts to riparian habitat at a minimum 3:1 ratio to result in no net loss of riparian habitat function. The REIR therefore does not rely on the physical setback of the existing garden area as the mechanism for protecting riparian resources.

The commenter's preference to retain the existing garden and vegetation is acknowledged. However, the existing area is located within the footprint necessary to accommodate the proposed bridge, creek walls, and parking lot, and improvements. Preservation of the garden in its existing configuration would therefore conflict with implementation of the proposed project as currently designed. Effects resulting from modification of this area have been disclosed throughout the REIR and are subject to the applicable aesthetic and biological-resource mitigation measures identified in REIR Section 4.1 Aesthetics and Section 4.3 Biological Resources.

Following construction, landscaping, and streetscaping improvements, the required revegetation would be incorporated into the proposed project. Mitigation Measure AES-1 addresses streetscape landscaping and visual compatibility, while Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR) separately addresses restoration and compensation for affected riparian habitat. Accordingly, the REIR provides separate measures appropriate to the visual and biological functions of the vegetation affected by the proposed project.

No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR1-4: The commenter expresses concern that the visual analysis omits Key View 6, consisting of views from the El Dorado Trail south toward the project area and the view from the Ivy House parking lot looking north across Hangtown Creek, which they believe has moderately high existing visual quality. The commenter states that Hangtown Creek and the El Dorado Trail are valued community and visitor resources that contribute to Placerville's scenic and historic character, making inclusion of this viewpoint important to the visual impact assessment. The commenter further contends that expanding the Ivy house parking lot to the creek's edge and increasing the height of the south creek

wall would degrade views from the El Dorado Trail by reducing the natural riparian setting and increasing the visibility of the Ivy house parking area.

The City acknowledges the importance of Hangtown Creek, the existing vegetation, and opportunities for public views of the creek within the project area. The commenter is referred to Global Response 4, for a comprehensive discussion of the existing visual character of the project area, anticipated visual changes associated with the proposed project, and the landscaping and architectural treatments to be incorporated into the proposed project. In addition, as described in Chapter 3 Project Description and evaluated in Section 4.1 Aesthetics and Section 4.3 Biological Resources of the REIR, implementation of the proposed project would alter the visual character of this portion of Hangtown Creek. The detailed configuration, landscaping, and architectural treatment of this area will continue to be refined during the PS&E phase consistent with the proposed project evaluated in the REIR.

With respect to the additional view identified by the commenter, Section 4.1 Aesthetics of the REIR evaluates representative key views selected to characterize the existing visual environment and the anticipated visual change resulting from the proposed project. The key views are representative viewpoints and are not intended nor required to identify every location from which the proposed project may be visible. Key View 1 and Key View 5 are representative of viewpoints north of Hangtown Creek looking south towards the project area from the El Dorado Trail. Furthermore, CEQA Guidelines Section 15151 states that an EIR's analysis need not be exhaustive, but rather that provide a sufficient degree of analysis to provide decision-makers (i.e., City Council) with information which enables them to make a decision which intelligently takes account of the environmental consequences of a project. The inclusion of the REIR's analysis of Key View 1 through Key View 5 provide sufficient information about the Project's aesthetic impacts to inform decision-making and represents an adequate, complete, and good-faith effort at full disclosure. In addition, CEQA Guidelines Section 15147 requires an EIR to contain maps, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts; it does not require visual simulations from every possible viewpoint. The commenter's identification of additional viewpoints is noted; however, the existence of additional key viewpoints of potential interest does not alter the REIR's analysis of the overall visual change associated with the proposed project. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR1-5: The commenter expresses that the listed vegetation in Mitigation Measure AES-1 is not appropriate for native riparian habitat for the rehabilitation of the disturbed creek sides. The commenter suggests contacting the El Dorado Chapter of the California Native Plant Society and using drought-tolerant, fire-resistant vegetation for the streetscape.

The commenter is referred to Global Response 6 regarding the final revegetation and landscaping plans. REIR Section 4.1 Aesthetics Mitigation Measure AES-1 is specific to streetscape landscaping and not revegetation for areas along Hangtown Creek where riparian habitat could be affected. Rather, Mitigation Measure AES-1 establishes the

applicable landscape and streetscape framework concepts consistent with the City of Placerville Main Street Streetscape Design Development Plan and City Development Guide adopted by the Placerville City Council on January 10, 2006. Mitigation Measure AES-1 includes low planter walls, street trees, accent planting, and period-appropriate streetscape treatments; however, the REIR does not establish a final planting plan. The precise species, number, size, and location of trees, shrubs, groundcover, and other landscape features will be determined during PS&E. Final landscape design will consider available planting areas, roadway sight distance, pedestrian and ADA circulation, utilities, drainage and hydraulic facilities, parking configuration, maintenance, biological-resource requirements, and compatibility with the surrounding historic and creek corridor setting. The final tree species that will be used for streetscape landscaping in the project area will be determined by the City prior to construction commencement, and the final decision could include consultation with and input from interested constituents.

Regarding impacts to native riparian habitat due to proposed project implementation, Section 4.3 Biological Resources of the REIR identifies a total of 0.04 acre of Valley Foothill Riparian habitat on which four white alder trees as well as understory shrubs and herbaceous species will be removed. This loss of riparian habitat would be mitigated through the implementation of Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR), specifically the fourth and fifth bullet points that identify habitat loss would be compensated at a 3:1 ratio within the Hangtown Creek watershed, or, if not enough space can be found in the watershed, then through the purchase of similar habitat value from a USACE-approved mitigation bank. A planting plan will be implemented for disturbed riparian areas as detailed in a restoration plan approved by the California Department of Fish and Wildlife (CDFW) and prepared during PS&E. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR1-6: The commenter requests that “off-site by purchasing mitigation bank credits” be removed from Mitigation Measure BIO-5 and Mitigation Measure BIO-6, as they believe this is not necessary and habitat loss could be mitigated through restoration within the Hangtown Creek watershed.

The project site is highly constrained by Hangtown Creek, existing development, Main Street, the El Dorado Trail, utilities, drainage infrastructure, retaining walls, and other existing improvements. The ultimate mitigation requirements for impacts to Hangtown Creek, riparian habitat, wetlands, and other jurisdictional aquatic resources will also be subject to applicable federal and state laws and the conditions of permits and authorizations issued for the project, including a California Department of Fish and Wildlife Streambed Alteration Agreement pursuant to Section 1602 of the California Fish and Game Code, Clean Water Act Section 401 Water Quality Certification from the Regional Water Quality Control Board, and a Department of the Army permit from the U.S. Army Corps of Engineers pursuant to Section 404 of the Clean Water Act.

These regulatory agencies may establish avoidance, minimization, restoration, monitoring, and compensatory mitigation requirements as conditions of their respective

permits and authorizations that are beyond what is stated in REIR Mitigation Measures. Where temporary disturbance occurs, the REIR specifically requires revegetation within the project footprint. Other compensatory mitigation for permanent impacts is governed by the applicable mitigation measures and regulatory permits and may occur onsite, within the watershed, or through an approved mitigation mechanism, depending upon the affected resource and agency requirements. The location, amount, type, and method of compensatory mitigation therefore cannot necessarily be limited to the immediate project site. Where sufficient mitigation can feasibly be accomplished on site and is acceptable to the applicable regulatory agencies, on-site mitigation will be utilized. Where on-site opportunities are insufficient to satisfy applicable mitigation ratios, performance standards, or permit conditions, off-site mitigation will be necessary to compensate for unavoidable impacts.

Additionally, in June 2026, various permittee-responsible possibilities were explored to satisfy the mitigation commitments for other unrelated projects within the City, including generating a list of potential restoration/enhancement areas in the Hangtown Creek watershed that could potentially be restored and/or enhanced with riparian vegetation, but no feasible options were identified.

As such, under Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 and BIO-6 in the REIR) pertaining to purchase of mitigation bank credits is a legitimate mitigation option that is standard practice in reducing biological resources due to project implementation. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR1-7: The commenter states that Tables 4.3-1 and 4.3-2 of the REIR incorrectly identify Hangtown Creek as intermittent. The second sentence below Table 4.3-2 on page 121 of the REIR states: “Hangtown Creek is shown as a perennial channel on the U.S. Geological Survey (USGS) Placerville quadrangle map and is mapped as riverine, intermittent, streambed, seasonally flooded (R4SBC) on the National Wetland Inventory (NWI).” The NWI maps Hangtown Creek a riverine, intermittent, streambed, seasonally flooded; therefore, the references of “intermittent” in Tables 4.3-1 and 4.3-2 are correct. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR1-8: The commenter indicates that bird nests are visible in the BSA and they have observed swallows and black phoebes nesting and feeding in the area as well as hawks, great blue herons, and egrets hunting in the creek contrary to the statement in the last paragraph under Section 4.3.2.4 Animal Species – Birds and Raptors of the REIR.

REIR Section 4.3.2.4 Animal Species, subheading Other Migratory Birds and Raptors paragraphs two and three specifically identifies that swallows, black phoebes, and raptors (hawks) are known to be found in areas such as the project site and does not deny their potential use of the area. The analysis also indicates that “valley foothill riparian habitat along Hangtown Creek, as well as the patches of montane hardwood-conifer forest provides potential nesting and foraging habitat for birds listed by the

MBTA". During field visits in 2007, 2008, 2009, and 2015, no nests or nesting activity were observed; however, that does not preclude nesting from occurring presently or prior to the commencement of project construction. Therefore, the REIR requires implementation of Mitigation Measure BIO-2 (formerly Mitigation Measure BIO-4 in the REIR) which requires that tree/shrub removal and grading activities be implemented during the non-breeding season (generally September 1 through January 31); however, if such activities are necessary during the nesting season (February 1 to September 30) nesting bird preconstruction surveys will be conducted no less than 14 days and nor more than 30 days prior to construction commencement within 250 feet of suitable nesting habitat. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR1-9: The commenter notes that rock retaining walls from old town hall to Bedford reportedly came from Folsom Prison.

Figure 4.4-1, marker 4 in the Key of the REIR, identifies these Hangtown Creek Retaining Walls as cultural resources within the Area of Potential Effects (APE). REIR Section 4.4.3.4 Cultural Resources subheading Hangtown Creek Retaining Walls describes the walls and identifies them as eligible for listing in the NRHP as a contributor to Placerville Main Street Historic District and they are identified as a historical resource as defined in CEQA Guidelines Section 15064.5(a). The REIR states that 200 feet of the Hangtown Creek retaining wall on the south side of the creek would require replacement. However, the REIR concluded that, because this section of the existing wall is a replacement of the original rock wall and was constructed using materials and design typical of its age, the loss would not adversely affect the qualities for which the Placerville Main Street District is assumed eligible. The City appreciated the information on the resource. Please see Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

7.3.4.3 Comment Letter LR2: Rebecca Neves

Letter Response 2

March 12, 2024

City of Placerville
Engineering Department
Attn: Melissa McConnell, Interim City Engineer
3101 Center Street
Placerville, CA 95762

Subject: Clay Street Bridge Replacement and Realignment project, Public Circulation of the Amended Draft Environmental Impact Report – Public Comment

Dear Ms. McConnell,

First let me start by commending you and the entire City team for the hard work around finalizing and circulating this document in a way that is both comprehensive and humble in the City's understanding and undertaking of the project. This project has been long on the books for the City, since the 1960's, and has been met with concerns from the public, both in opposition and in favor of replacing the bridge. The City took a thoughtful and thorough approach to the project after receiving the Writ of Mandate received at the judgment on February 14, 2012 for the City's previous environmental document, which was originally drafted as a Initial Study with a Mitigated Negative Declaration. The City has also taken to heart to address comments received in the 2018 EIR circulation.

LR2-1

<u>Druid Monument Impacts</u>

Thank you for continuing to take the time and care to coordinate with the United Ancient Order of the Druids (UAOD), who first erected the monument within or soon after the time the bridge was built, estimated around 1926. The monument served as a way to help move traffic by means of an informal traffic circle while giving light to the community.

As you know, the monument will be impacted by the project and UAOD not only understands these impacts but has consistently supported it on the grounds that relocation of the monument will be for its protection. Its location within the intersection has led to many instances of it being hit by moving vehicles. Its proximity to the Cedar Ravine culvert puts it at risk for failing when the culvert fails. The UAOD has formed a historic monument preservation committee and the City is complimented for keeping them engaged in the process.

For the context of clarification, I also would like to speak on the involvement of the local UAOD grove. As you're aware, at the Section 106 consultation meetings that took place in June of 2018 following circulation of the 2018 EIR, a group of local individuals attended the UAOD consultation meeting, without permission of the National Order of the UAOD. These individuals are documented as Kirk Smith, Michael Drobesh, and David Price and represented themselves as the

LR2-2

delegated authority to comment on the project and the monument on behalf of the UAOD. That couldn't have been further from the truth. In September of 2018, the City was notified by members of the National Order of the UAOD that not only do these individuals not represent the organization as a whole, but that the local and self-appointed Grand Arch at the time (Kirk Smith) had been removed from his position for violation of the organization's bylaws. Since that time, the City has taken great care to work with the UAOD National Order and has engaged measures that will be required for protection of the monument through construction including its UAOD approved relocation and placement. Thank you for consistently caring for this monument and doing the work it takes to research and develop a thoughtful relocation approach and plan. LR2-2

Section 106 Consultation in 2018

Thank you for spearheading the supplemental Section 106 Consultations that took place in June of 2018, even after the City had opened and closed Section 106 consultation years prior. As a party to that process and speaking specifically to items that are not protected in that process, I would like to daylight something that occurred during the consultation. The City met with Friends of Historic Hangtown (FOHH) at 11 am that day, who were the individuals responsible for developing the Writ of Mandate in opposition to the project. Attendees of this group included Sue Taylor, Michael Drobesh, and Jennifer Chapman, with Sue Taylor being the driving voice of the group. Behavior was firsthand observed and witnessed by myself and a staff member from Caltrans (Lisa Machado) at the conclusion of meeting with the Friends of Historic Hangtown as the City and Caltrans teams broke for lunch. LR2-3

The consulting party (FOHH) had left, or so the Caltrans and City team thought, and the building had been locked up. As the City/Caltrans team walked to lunch, both myself and Lisa Machado got an uneasy feeling and decided to head back to Town Hall. What we walked in on when we returned to Town Hall was Sue Taylor and Jennifer Chapman had reentered the building and were found riffling through my notes of the confidential Section 106 consultation meetings. When we walked in, Jennifer Chapman and Sue Taylor quickly put the papers back in order and immediately offered up the "explanation" of, "we were just looking for a sign in sheet", after they had already been noted as attending. This left both Lisa Machado and I feeling very uneasy, and we promptly collected the confidential notes of the City and Caltrans teams and kept them protected and in our direct care throughout lunch until we returned to Town Hall and returned the information to each individual member of the City/Caltrans team.

I fully recognize that this information is not germane to the circulated document but is solely written for the benefit of daylighting the character of the project's biggest opponent. I encourage any legal team involved in this process, inclusive of a presiding and honorable judge, to consider this information on the basis of character when receiving testimony or accounts from the Friends of Historic Hangtown and specifically, from Sue Taylor. This incident may have been one of the more egregious instances where Ms. Taylor's character has been daylighted, and it is one of many I have personally witnessed over the course of this project. Do not be fooled by her assertions, they are rarely accurate and are often untruthful.

Project Funding

The Clay Street Bridge project was accepted into the Highway Bridge Program (HBP) in 2006. The HBP is a source of federal funding designed to support local and state agencies in their efforts to implement bridge safety as safety is the cornerstone value of the HBP. Among its guiding principles, the HBP has taken a policy stance based on research and observations that bridges over 50 years old can be considered for rehabilitation, while bridges older than 75 years are to be considered for replacement. The existing Clay Street Bridge, by estimates from City documents, is approximately 98 years old and constructed with means and methods that are substandard in terms of bridge design and construction. As a state, California has made great strides in understanding and implementing the safety design and construction standards for bridges based on lessons learned following key seismic events that have occurred in the past 100 years.

The State of California, through its Department of Transportation (Caltrans) manages the HBP on behalf of Federal Highways (FHWA) for both on and off highway bridges. In order for a project to be accepted into the HBP, a litany of information must be provided to subject matter experts with the State to justify and prove that the bridge is indeed unsafe and warrants the attention and funding of the program. Not only has that been provided in 2006, but again throughout various project extensions that have occurred over the course of the project's history, including but not limited to 2019, 2021, and in its current context without end date. This federal program and its funding can only be used on bridge safety projects that are in the program and the funds to complete the project are available now but may not be in 5 years given the impacted program and volume of bridges that are seeing failure points throughout the State. The City would do well to keep persevering in delivering this project through its funding from the HBP.

LR2-4

Wildland Fire Community Resiliency

Placerville is no stranger to fires; it is the reason why there is a bell tower in the center of Main Street and cisterns below. On a regular basis, City and County staff train for and often respond to small wildland fires, and on occasion, large wildland fires such as the Caldor Fire in 2021. The challenge with fire resilience is allowing the public sufficient ways to evacuate the area. The Caldor Fire in 2021 showed that a fire to the east will severely impact US 50. But what happens when the fire is to the north of Placerville? This is the very scenario City and County staff have trained for through wildland fire modeling and Emergency Operations Center mock events as it is the point of greatest vulnerability to the community of Placerville. In these training scenarios, one of several locations where traffic becomes locked up is at the one-lane existing Clay Street Bridge. Should a fire break out in the north canyon, the public will evacuate to the south, making the proposed Clay Street to Cedar Ravine Road a critical connection in that effort. The residence in and around Clay Street, as well as further north up Mosquito Road, need several ways to evacuate to the south, and Clay Street in its proposed realignment is a viable connection to that evacuation. The existing single-lane bridge is not capable of handling that volume of traffic load during an event and needs to be replaced with a two-lane bridge that can handle traffic flow in both directions – with evacuations heading south and emergency response heading north.

LR2-5

This information is further supported and validated in the work the El Dorado County Transportation Commission is doing under its Greater Placerville Wildfire Evacuation Preparedness and Community Safety and Resiliency Study.

LR2-5

Condition of the Existing Bridge

The bridge is an earthen filled arch culvert bridge. This is not a style of structure that is constructed anymore and for good reason. That reason is the same reason why the existing bridge is now actively failing. The information contained in Appendix C outlines the structures' ongoing deficiencies, including failure of the internal earthen material that is intended to carry structural strength and load as part of the bridge. These deficiencies are further evidenced by the bridge's sufficiency rating continuing to decline. For lack of a better description, the existing Clay Street Bridge has Stage 4 cancer and vital structural systems are starting to fail. There is no saving this type of bridge when it has reached this point of decomposition. The bridge is rotting from the inside out and it is not a matter of ***if*** the bridge will fail, but ***when***. Unfortunately, the prior judgement in 2012 didn't "save" the bridge, but has merely prolonged the inevitable by 12 more years, placing the bridge at closer risk of failure in its current condition of rot and decay.

LR2-6

The City has done all it can to maintain this bridge, but as it was accepted into the Highway Bridge Program for replacement in 2006, it was clear to both state and local experts then that the bridge's end of service life was near.

The City has taken seriously every comment it has received, even the misinformed and ungenerous ones that are often met with the patience and grace of the City team than a response. The City has consistently shown that it is open to finding a reasonable and respectful way to accurately memorialize and honor the emotional connection between the community and the bridge and Druid Monument while not negotiating away the need for public safety.

Thank you for all your hard work on this document, addressing every single comment and concern that the City has heard over the years both in favor and opposed to the project. Please continue to move this project forward for replacement of the existing bridge.

Warmest Regards,



Rebecca Neves, P.E.
Proverbs 1:3

7.3.4.4 Response to Comment Letter LR2 Rebecca Neves

LR2-1: The commenter expresses support for the City's efforts in preparing the REIR, commending the project team for developing a comprehensive document and thoughtfully addressing concerns raised throughout the project's long planning history. The commenter also notes that the City took a thorough approach to environmental review following the 2012 Writ of Mandate and incorporated comments received during the 2018 EIR circulation process. The City appreciates the expression of support from the commenter. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR2-2: The commenter expresses appreciation for the City's continued coordination with the UAOD regarding the historic monument and supports its relocation as a means of protecting it from vehicle collisions and potential failure associated with the nearby Cedar Ravine Culvert. The commenter states that the UAOD has consistently supported the project and commends the City for engaging the organization and its monument preservation committee throughout the planning process. The commenter also clarifies that certain individuals who participated in 2018 consultation meetings did not have authority to represent the UAOD and were not recognized by the National Order of the UAOD. The commenter concludes by praising the City's efforts to work directly with the National Order of the UAOD and to develop an approved relocation and protection plan for the monument during construction. The City appreciates the comment and identifies the continued coordination with UAOD pertaining to the Druid Monument relocation as required and outlined in Section 4.4 Cultural Resources Mitigation Measure CUL-2 under bullet points 5 and 6 of the REIR. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR2-3: The commenter provides information regarding participation in the Section 106 consultation process and describes concerns regarding interactions among consulting parties. To the extent the comment describes interpersonal disagreements or the conduct or motivations of individual participants in previous consultation discussions, those matters do not raise an environmental issue regarding the adequacy of the REIR under CEQA and do not require further environmental analysis.

Please refer to Global Response 5. Section 106 consultation under the National Historic Preservation Act does not require all consulting parties to agree regarding the undertaking, its effects, or appropriate mitigation. Rather, the process requires the agency to provide consulting parties with a meaningful opportunity to express their views and requires those views to be considered in reaching decisions regarding historic properties. Differences of opinion among consulting parties therefore do not, by themselves, indicate that the consultation requirements of Section 106 have not been satisfied. Consultation under Section 106 will continue, as applicable, through completion of the federal historic preservation process. The City and Caltrans will continue to consider information provided by the appropriate consulting parties in accordance with Section 106 and the applicable federal procedures. Please refer to

Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR2-4: The commenter expresses support for replacing the Clay Street Bridge, citing the bridge's age, outdated design, and safety deficiencies, and noting that it was accepted into the Highway Bridge Program (HBP) in 2006 based on documented safety concerns. The commenter states that state and federal transportation agencies have repeatedly reviewed and confirmed the need for the proposed project through multiple program extensions and funding approvals. The commenter further emphasizes that HBP funding is specifically designated for bridge safety projects and argues that delaying the proposed project could jeopardize the availability of funding in the future as competing bridge repair and replacement needs increase statewide. The City appreciates the expression of support from the commenter. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR2-5: The commenter expresses concern about wildfire evacuation and emergency response capabilities in Placerville and supports replacement of the existing one-lane Clay Street Bridge with a two-lane bridge to improve community resilience during emergency events. The commenter states that wildfire planning exercises and experiences during events such as the 2021 Caldor Fire have identified the existing bridge as a potential traffic bottleneck, particularly during evacuations from areas north of the city. The commenter contends that the proposed bridge and roadway realignment would provide a critical evacuation and emergency access route and cites regional wildfire evacuation planning studies as support for the project's safety benefits. The project objectives, as shown in REIR Section 3.3 Project Objectives align with the commenter's concerns and identify the need for bridge replacement for safety factors. Section 4.10 Transportation and Traffic Threshold D of the REIR states that the El Dorado County Transportation Commission (EDCTC) under the proposed Greater Wildfire Evacuation Plan identifies Clay Street and the existing Clay Street Bridge as an evacuation location of concern in the City. This is due to the existing degraded condition of the bridge, the narrow width of the existing bridge, and the narrow roadway width to the north and south of the existing bridge. The proposed project would eliminate these concerns by providing an improved facility that would reduce choke points in the City if an evacuation is needed. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR2-6: The commenter expresses strong support for replacing the existing Clay Street Bridge, citing its advanced structural deterioration, declining sufficiency rating, and documented deficiencies as evidence that the bridge is nearing the end of its service life and cannot be feasibly rehabilitated. The commenter states that state and local transportation experts have recognized the bridge's safety concerns for many years, as demonstrated by its inclusion in the 2006 HBP for replacement, and argues that delaying replacement has only prolonged the risks associated with the aging structure. The commenter also commends the City for its efforts to address public comments, honor the community's connection to the bridge and Druid Monument, and balance

historic preservation concerns with the need to improve public safety through project implementation. The City appreciates the expression of support from the commenter. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

7.3.4.5 Comment Letter LR3: Tim Costello

Letter Response 3

March 12, 2024 *Via Email: mmcconnell@cityofplacerville.org*

City of Placerville

Attn: Melissa McConnell, Interim City Engineer

3101 Center Street

Placerville, CA 95667

Subject: Clay Street Bridge Replacement REIR

Dear Ms. McConnell:

I am writing to voice support for the project option of retaining the current alignment of Clay Street rather than creating a traditional 4-way intersection with Cedar Ravine Road.

The two offset intersections of Main Street/Clay Street and Main Street/Cedar Ravine Road is a unique and quirky feature. Along with the Druid monument the street alignments provide character for that area of Main Street. The street alignments are historic, an artifact of earlier times, and as such support the overall character of historic Placerville.

Realigning Clay Street to Cedar Ravine Road to create a traditional 4-way intersection would destroy the unique character of the roadways and require repositioning of the historic Druid monument. A traditional 4-way intersection, with its right angles, would be a modern practical intersection but would be entirely out of character with the historic surroundings.

Many streets in Placerville have a quirky character, winding around hillslopes or other features. It's these unusual alignments that help drive home the feeling of earlier times of the pioneer era. Creating a 4-way intersection at Cedar Ravine Road would erode part our pioneer heritage, and repositioning the Druid monument next to a 4-way intersection would reduce the unique impact the monument currently provides.

LR3-1

I disagree with the premise that the bridge replacement project would "require" the realignment of Clay Street to Cedar Ravine Road. If the replacement bridge encroaches upon private property or a highway easement those entities could be contacted to negotiate purchase or easement rights of those presumably narrow strips of land. If that is pursued but not attainable then evaluate narrowing the replacement bridge to accommodate the available width of property – possibly having one combined pedestrian/bike lane on one side of the bridge only and/or keeping the bridge a one-lane bridge as it currently is.

Additionally I would advocate retaining as much of the current bridge's character as practical for the new bridge design so that the new bridge will look familiar and still evoke a sense of age.

LR3-2

Thank you for considering my comments.

Sincerely,

Tim Costello, Shingle Springs

7.3.4.6 Response to Comment Letter LR3 Tim Costello

LR3-1: The commenter expresses support for retaining the existing Clay Street alignment and opposes the proposed realignment to create a conventional four-way intersection with Cedar Ravine Road. The commenter contends that the offset intersections, together with the Druid Monument, are distinctive historic features that contribute to the character and sense of place of downtown Placerville and reflect the City's pioneer-era development pattern. The commenter further states that constructing a traditional four-way intersection and relocating the Druid Monument would diminish the area's historic character, reduce the monument's visual significance, and erode an important element of Placerville's heritage.

The City acknowledges the importance of Placerville's historic character and the community's interest in retaining features that reflect the City's historic development. Preservation and retention of the existing overall historic character is expressly identified as objective E of the proposed project (see REIR Section 3.3 Project Objectives). The REIR also recognizes the Druid Monument as an important historic resource and acknowledges that its historic placement within the intersection contributes to its significance (see REIR Section 4.4 Cultural Resources).

The REIR distinguishes between the historic significance of the Druid Monument itself and the historic integrity of the existing roadway configuration. As discussed in Section 4.4 Cultural Resources of the REIR, the portion of the former Lincoln Highway within the project limits has been widened, reconfigured, repaved, restriped, and otherwise altered numerous times, particularly beginning in the 1960s with removal of the Federated Church and Ivy House. Since elements within the project area have been reconfigured, the REIR also concludes that realignment of the approximately 160-foot-long segment of Clay Street would not adversely affect the character-defining qualities of the assumed-eligible Placerville Main Street Historic District and would not constitute an adverse impact for the purposes of CEQA. Refer to Global Response 3 for a discussion of the intersection realignment.

The City nevertheless recognizes that the Druid Monument presents a different historic preservation consideration. Section 4.4 Cultural Resources of the REIR acknowledges that the monument's original placement near the center of the intersection provided enhanced visibility and prominence and that its historic function as a traffic-calming feature is a character-defining element of the resource. Refer to Global Response 5 for a discussion of the proposed movement, impact determination, and proposed mitigation measures regarding the Druid Monument.

Accordingly, Section 4.4 Cultural Resources of the REIR does not disregard that the historic character of the existing setting or the Druid Monument. Rather, it recognizes those historic values, evaluates the effects of the proposed realignment on both the broader assumed-eligible Placerville Main Street Historic District and the individually significant Druid Monument, and identifies the adverse effect to the monument accordingly. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR3-2: The commenter expresses disagreement with the assertion that replacement of the Clay Street Bridge requires realignment of Clay Street to Cedar Ravine Road, suggesting that property acquisition, easements, or design modifications should be explored to maintain the existing roadway configuration. The commenter recommends considering alternatives such as a narrower bridge footprint, a single shared pedestrian/bicycle facility, or retaining a one-lane bridge if right-of-way constraints cannot be resolved. The commenter also advocates for preserving as much of the existing bridge's historic character as practicable so that the replacement bridge maintains a familiar appearance and sense of age consistent with the surrounding historic setting.

Chapter 6 Project Alternatives of the REIR thoroughly analyzed alternative designs to the proposed project. The alternatives that were considered include: Alternative 1: No Project/No-Build Alternative; Alternative 2: Clay Street Bridge Replacement/No Clay Street Realignment; Alternative 3: Clay Street Bridge Replacement with Roundabout; and the proposed project. The REIR also examined alternatives that were considered but eliminated from further analysis including: Construct New Clay Street Bridge Parallel to Existing Bridge with Clay Street Realignment; Clay Street Bridge Rehabilitation; Clay Street Bridge Rehabilitation and Reclassification; and, Closing the Ivy House Parking Lot and Clay Street to Vehicle Traffic. Refer to Global Response 2 for information on infeasibility of bridge rehabilitation and Global Response 3 for discussion of realignment of the intersection and why Clay Street Bridge Replacement and Clay Street Realignment is required and adequately meets the objectives of the proposed project. No revision to the environmental analysis of the REIR is necessary in response to this comment.

7.3.4.7 Comment Letter LR4: Marian Washburn

March 8, 2024

Letter Response 4

1

Comments to the Draft Recirculated Environmental Impact Report for the Placerville Clay Street Bridge replacement and intersection re-alignment

MITIGATION MEASURES Mitigation Measure TRAF-1 , page 291

The City shall prepare and implement a construction Traffic Management Plan.

A current and ongoing use not mentioned in the EIR is accommodation of delivery trucks for the Melters restaurant. Delivery trucks access the restaurant by going up Clay St., northbound, making a U-turn where Grandview comes into Clay, and then head back southbound to park in the travel lane until deliveries are complete. I have observed that these deliveries can take anywhere from ten minutes to forty-five minutes. LR4-1

See photos below.

Once the bridge is closed to traffic, another method for truck delivery will have to be devised.







Section 3 Transporation

Page 280, 4.10.2.3

There are no on-street bicycle lanes (Class 2) in the proposed project area. Existing pedestrian facilities in the proposed project area include sidewalks and midblock crosswalks on Main Street. Clay Street and Cedar Ravine Road have limited segments of existing sidewalk. Some of the existing pedestrian facilities are in compliance with the Americans with Disabilities Act (ADA); however, none of the midblock crosswalks on Main Street in the proposed project area have ADA-compliant curb ramps. The existing Clay Street Bridge has a substandard barrier rail and sidewalk, effectively requiring pedestrians, bicycles, and vehicles to share a one-lane road.

LR4-2

No specific mention is made in the Recirculated EIR of the sidewalk's lower elevation to the vehicle travel lane. This renders the pedestrian portion of the bridge un-noticeable to most pedestrians, and unusable during rainy periods due to flooding.



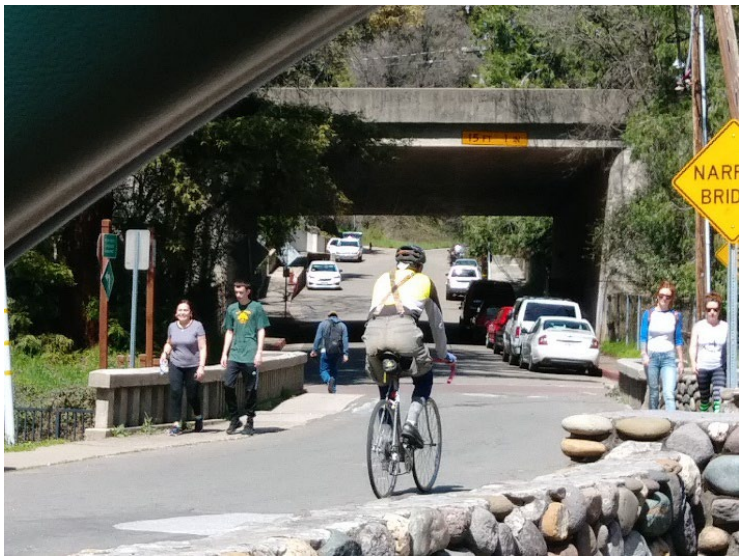


Photos show "sunken" sidewalk and exceptionally low bridge railing.











As can be seen in the above photos, the Clay St. vehicle lanes are used simultaneously as the pedestrian and bicycle thoroughfare, compounding problems related to the location and configuration of Clay St. as it intersects with Main St. <u>This needs to be made clear in the Recirculated EIR.</u>

LR4-2

Growth Inducement Analysis

Page 304, 5.14.3

The proposed project would replace the existing one-lane Clay Street Bridge with a new two-lane bridge, requiring the realignment of Clay Street to form a new four-way intersection with Main Street and Cedar Ravine Road. The existing bridge currently accommodates two-way traffic as Clay Street is a two-lane roadway north and south of the bridge. Thus, the replacement of the bridge is not capacity increasing. The proposed project would provide safer vehicle, pedestrian, and bicycle travel compared to existing conditions.

LR4-3

As can be seen in the photos on the previous page, the Clay St. vehicle lanes are used simultaneously as the pedestrian and bicycle throughfare, compounding the problems related to the location and configuration of Clay St. as it intersects with Main St.

Additionally, the Recirculated EIR document needs to cite the existing condition with the current traffic configuration which can be corrected with the proposed re-alignment.

Safety aspects of the existing condition at Main/Clay St. intersection

4.10.2.2 Existing Safety Conditions Table 4.10-1

……. lists crashes reported within 100 feet of the Main Street intersections with Clay Street and Cedar Ravine Road as provided by the City and Statewide Integrated Traffic Records System (SWITRS) database for the period from January 2004 through December 2022

LR4-4

The report needs to acknowledge the dangerous lack of sight distance with the existing condition and configuration of the Clay/Main St. intersection.

The photos below show extreme conditions that jeopardize vehicle travel and pedestrians. Due to the substandard conditions, the vehicle roadway is assumed by pedestrians and bicyclists to be for their use. New construction needs to include adequate space for bikes and walkers and adequate sight distance for vehicles.





This current usage of the street, along with the other sightline issues, substantiates the need for reconfiguration of the intersection. Additionally, the frequency of illegal parking on Main at Clay St. bocks the line of sight for southbound motorists approaching Main St. In these circumstances the only way to safely pull out onto Main (either eastbound or westbound) is to pull up fully into the crosswalk, completely obstructing the crosswalk in order to see on-coming traffic.

LR4-4

These conditions need to be noted in the Recirculated EIR Document.

Page 305, Section 3.6, Cumulative Projects,

Table 3.6-1 lists cumulative projects in the General Plan area. Among those is Cottonwood Phase 4 and 6, a residential subdivision on approximately 22.2 acres north of Clay Street and east of the Cottonwood Apartments. This is an approved project for which the City adopted a Mitigated Negative Declaration that, among other items, evaluated that project's growth-inducing effects. The full buildout of Cottonwood Phase 4 and 6 will occur under existing approvals. The proposed project is necessary to accommodate traffic generated by the Cottonwood Phase 4 and 6 Project in a safe manor. The Cottonwood subdivision was required to contribute to the proposed project. As such, while the proposed project would accommodate growth commensurate with existing approved development; however, it would not increase roadway volume capacity on Clay Street, Main Street, or Cedar Ravine Road. The proposed project is not growth-inducing. LR4-5

The description of the pre-existing conditions that established the need for an enlarged bridge and realigned intersection needs to be more fully described:

Prior to the Cottonwood Development approval, Clay Street dead-ended at Coleman St. During public hearings concerning the Cottonwood approval, residents of then-existing "old" Clay St. pointed out if all of the proposed dwellings were to be built, ingress and egress through the bridge would be completely inadequate for daily use as well as safety purposes. Both residents and decision makers were told by the City that future bridge widening and realigning the Clay St. intersection were assured since those improvements were already part of the approved City of Placerville's Master Street Plan. Reflecting that commitment and obligation, each parcel on Clay St. was monetarily assessed as a contribution to those improvements. Presumably the City still holds those funds. Their value may have diminished over time but not the obligation to follow through. In other words, the City assured the area residents safety improvements of bridge widening and intersection improvement would be made if the Cottonwood development were to go forward. In fact, the first and most dense phase of Cottonwood *was* built, the properties were assessed for the improvement, but that improvement has yet to be built. LR4-6

Submitted by Marian Washburn

Placerville resident, Azalea Lane

mewash@hotmail.com

7.3.4.8 Response to Comment Letter LR4 Marian Washburn

LR4-1: The commenter requests that Mitigation Measure TRAF-1 in the REIR, pertaining to preparation of a Traffic Management Plan, needs to include truck routes/detours as there are a lot of deliveries to businesses in the project area and specifically for Melters restaurant. Although the specific Mitigation Measure implies that detour/road closure will be part of the Traffic Management Plan for all vehicles (including delivery trucks), for clarity purposes, the second bullet point of Mitigation Measure TRAF-1 has been revised in the Final EIR to include delivery trucks and routes as shown in the following text:

Detour/Road Closures: Detour signage will be installed near construction zone to effectively redirect traffic. Potential adverse impacts to circulation and access will be avoided by maintaining as many open lanes as possible along Main Street and Cedar Ravine Road in both directions during construction. The detour/road closure will also consider routes for delivery trucks entering and exiting the project area in the Historic District of Placerville.

LR4-2: The commenter references page 280, Section 4.10.2.3 of the REIR, specifically, "The existing Clay Street Bridge has a substandard barrier rail and sidewalk, effectively requiring pedestrians, bicycles, and vehicles to share a one-lane road." The commenter requests that additional detail about the existing condition of the bridge's sidewalk as the sidewalk's lower elevation to the vehicle travel lane renders the sidewalk un-noticeable to pedestrians and unusable during rainy periods. The commenter also notes that the REIR should clarify that vehicles/pedestrians/bicyclists share the Clay Street thoroughfare in the project site due to the bridge conditions.

The City appreciates the request of the commenter. The referenced sentence does indicate that the Clay Street Bridge has a substandard barrier rail and sidewalk and therefore implies degraded conditions of both features. The referenced sentence also identifies that the bridge area is shared by vehicles/pedestrians/bicyclists because of its current conditions. As such, the description of the existing conditions is adequate and the addition of specific details about the sidewalk would not change the already implied need to replace the bridge and its facilities. The comment, therefore, does not identify a new significant environmental impact or require a change to the conclusions of the REIR. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR4-3: The commenter references page 304, Section 5.14.3 of the REIR, specifically highlighting "The proposed project would provide safer vehicle, pedestrian, and bicycle travel compared to existing conditions." The commenter also references pictures they have included to emphasize that the Clay Street area through the bridge is used simultaneously by vehicles, pedestrians, and bicyclists.

The City appreciates the comment. Please refer to Response LR4-2. All improvements detailed in Section 3.4 Proposed Project of the REIR are also consistent with the project objectives identified in Section 3.3 of the REIR. The proposed project was developed to address the existing structural and functional deficiencies of the Clay Street Bridge;

improve roadway safety and traffic operations; improve pedestrian and bicycle access and safety; accommodate emergency and service vehicles; and provide a replacement facility that meets current applicable design standards while retaining the overall historic character of the project area. The proposed project meets all of the objectives identified in Section 3.3 of the REIR. The two-lane replacement bridge and Clay Street realignment are therefore not intended to increase roadway capacity, but are components of a comprehensive design that addresses the existing deficiencies of the bridge, intersection, and multimodal circulation system while achieving the full range of project objectives.

The photographs and observations submitted by the commenter therefore provide additional documentation of existing conditions but do not alter the environmental conclusions of the REIR. Rather, they further support the project objectives and the need to correct the existing bridge and roadway deficiencies and improve safety and connectivity for motorists, pedestrians, and bicyclists. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR4-4: The commenter references Section 4.10.2.2, Table 4.10-2, specifically emphasizing the sentence "…lists crashes reported within 100 feet of the Main Street intersections with Clay Street and Cedar Ravine Road…" The commenter also provides photographs showing parked vehicles at intersections resulting in reduced sight-distance and states that illegal vehicle parking contributes to such conditions. The commenter requests that the REIR acknowledges the dangerous intersection sight-distance conditions, the need to include adequate room for pedestrians and bicyclists and emphasizes that these are the reasons a reconfigured intersection is needed.

The City appreciates the comment. Throughout the REIR, discussions emphasize the need for intersection realignment to improve safety for vehicles, pedestrians, and bicyclists. Section 3.3 Project Objectives of the REIR identifies one of the many purposes of the proposed project is to improve pedestrian and bicyclist access and safety in the project area and improve roadway public safety. This includes safety improvements associated with intersection realignment.

Table 4.10-2 of the REIR identifies vehicle crash types that have occurred at two intersections in the project footprint. Furthermore, Section 4.10 Transportation and Traffic, Section 4.10.5 Project Impacts Threshold C analyzes the improvements to the realigned intersection which would reduce traffic vehicle accidents and increase accessibility and safety for pedestrians and bicyclists. Consolidating the two existing intersections would provide a more conventional and predictable intersection configuration and would allow sight distance, vehicle stopping locations, pedestrian crossings, and other geometric features to be addressed as part of an integrated intersection design. Refer to Global Response 3 for additional information on the intersection realignment.

Additionally, the proposed project would provide ADA-compliant pedestrian facilities along Clay Street and across the replacement bridge, ADA-compliant curb ramps and crosswalks at the Main Street/Clay Street/Cedar Ravine Road intersection, and a Class

III bicycle connection between Main Street and the El Dorado Trail. These improvements would provide a more complete and continuous system for non-motorized users.

With respect to the commenter's observation regarding illegal parking, compliance with existing parking restrictions is principally an enforcement matter and is not, by itself, an environmental impact of the proposed project.

The photographs and observations provided by the commenter therefore provide additional documentation of existing conditions and further support the need for the proposed project. They do not change the impact conclusions of the REIR. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR4-5: The commenter references Section 3.6 Cumulative Projects page 306 of the REIR and specifically identifies "The proposed project is necessary to accommodate traffic generated by the Cottonwood Phase 4 and 6 Project in a safe manor [sic]. The Cottonwood subdivision was required to contribute to the proposed project" noting that the description of the pre-existing conditions that established the need for an enlarged bridge and realigned intersection needs to be more fully described in the REIR.

The City appreciates the comment and also acknowledges the commenter's observation regarding previously approved development in the Cottonwood area. As discussed in Section 5.14.3 Growth Inducement Analysis of the REIR, the proposed project has been included in the City's Traffic Impact Mitigation Fee Program since the Nexus Study was adopted in 1998. The project was determined to be necessary to offset the impact of the Cottonwood Development Project phases. Since 1998, various phases of the Cottonwood Project were completed and required to pay Traffic Impact Mitigation (TIM) Fees or pay direct development fees to the proposed project. Currently, the pinch point at the Clay Street bridge makes it a less desirable route and drivers use Mosquito Road instead. After project completion, traffic may be redistributed in the sense that traffic from the previously built developments may now use the under-utilized Clay Street route. This would not be considered growth inducement by the proposed project, but rather a redistribution of currently existing traffic volumes.

Please refer to Section 3.3 Project Objectives of the REIR that describes the purpose and objectives of the proposed project and why it is needed. Refer to Chapter 3 Project Description and Global Response 1 which describes the existing condition and continued deterioration of the bridge and the reasons why a new bridge is needed. Additional emphasis requested by the commenter in the REIR is not warranted as it would not change the impact conclusions of the environmental document. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR4-6: The commenter is requesting that the City fulfill its prior commitment to widen the bridge and realign the Clay Street intersection, which was presented as a necessary safety improvement and included in the City's Master Street Plan when the Cottonwood Development was approved. The commenter states that Clay Street properties were assessed to help fund these improvements, but despite the partial Cottonwood development being built and the assessments collected, the promised infrastructure

upgrades have not been completed. The City appreciates the comment. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

7.3.4.9 Comment Letter LR5: Josette Johnson

Letter Response 5

Josette Johnson

3129 Spanish Ravine Road
530.313.0147
josettej@comcast.net

March 12, 2024

City of Placerville
Attn: Melissa McConnell, Interim City Engineer
3101 Center Street, Placerville, CA 95667
mmcconnell@cityofplacerville.org

Dear Melissa McConnell:

On January 25, 2000 the City Council unanimously approved our 10 goals for the hangtown creek master plan. Community Pride and the Hangtown Creek Stewardship Committee spent 10 years researching, documenting, writing, holding public workshops establishing the community values for Hangtown creek, incorporating general plan goals, streetscape plans, revitalization plans, working with trails now and the heritage association and working with the city on a plant list sampler, working with the planning commission on a master plant list and working with fish and game on a riparian and native plant list. Please show if any of these watershed protection goals were incorporated into this project to protect the creek area, increase aesthetic value and sense of community and reduce flooding. Questions & Requests~ LR5-1

1. Shade trees & Garden Spots~ There is a section of the lot across Clay Street to the east where there is a triangle. Please describe if this is a location for a garden or shade tree. Please include a description of a stone planter and shade tree. Is there water available at this location? Could water be brought over from the cork oak planter? Please show how this would create a pleasing entrance to the clay street neighborhood and provide valuable shade. Please see Community Prides plant list sampler with the city of placerville brochure, native plant list approved by fish & game and our master plant list for suggestions on shade trees and natives plants along hangtown creek. LR5-2
2. Historical Landmark Druid Torch Monument~ please describe how the Druid monument will be placed so pedestrians can safely view it up close and placed in a way to enhance this entrance to downtown Main Street. LR5-3
3. Our general plan states that “the city shall encourage the uncovering of Hangtown creek in future developments” How will this project achieve this goal? How many additional feet of this class one rainbow trout fishery of Hangtown Creek will be covered and at what location can an equal amount of feet be uncovered? LR5-4
4. The general plan calls for Hangtown creek to incorporate pedestrian access. The ivy house creekside park has wheelchair access, how will access to Hangtown creek be LR5-5

improved with this project? The park provides a fish observation area, how will Hangtown creek be incorporated into this project? LR5-5

5. The general plan states that "the city shall make every effort to protect riparian vegetation. To this end, buildings and improvements will be set back from watercourses." How can this project be set back from Hangtown creek? LR5-6
6. Please don't remove the creekside park. Please describe if the irrigation line will be retained. There are few locations where landscaping is on both sides of the creek. A stormwater garden with this water line would allow for a sidewalk for wheelchair access to the fish observation area and with irrigation would allow for shade trees and a beautification garden. LR5-7
7. The boundaries for the study area of this project show the trail to locust street and the right of way to Bedford Ave. Please consider the trail extending to Bedford as possible mitigation as well as whether our irrigation at the trail and clay will be maintained and available to landscape to locust street. Are there any foreseeable projects within this area (like the potential of a Main Street parallel road or expansion of highway 50 that would preclude extending the trail or relocating the park to these areas)? LR5-8

   Background~ Our first creek project was at the area west of Bedford along hangtown creek. Community pride volunteers worked there five years restoring the bank at old city hall parking lot. When Caltrans widened the highway we were moved to clay street and we worked for five years restoring the creek bank along the el dorado trail. Then when the sewer came out at clay street our project was moved to Randolph creek, we spent fifteen years restoring that area and we were told that we could come back when the sewer came out. Also, we had a waterline from the park to the trail side that ran under the bridge that would give us water when the sewer project was done. The water was installed at clay street at el dorado trail and clay street. Community pride was working with representatives of trails now to landscape this area of the creek and trail. Then we were told not to reestablish our creek project until the clay street bridge project was complete. It has been over 10 years and we are requesting that the water be maintained at this location for establishing landscape and creek restoration and if any mitigation for this project impacts are established that the mitigation be utilized between Bedford and Locust street at the same area impacted. LR5-9

   Recommendation~ Please consider including Community Pride as a consulting party in the mitigation implementation process? Our organization has a vested interest in the project, as demonstrated by our history of volunteer efforts in the City of Placerville, including the maintenance of landscaping features affected by the proposed changes. We believe our input and involvement would greatly contribute to mitigating the visual impact of the project and preserving the beautification of the area. LR5-10

Sincerely yours,

Josette Johnson

Josette Johnson

7.3.4.10 Response to Comment Letter LR5 Josette Johnson

LR5-1: The commenter is requesting that the City demonstrate how the watershed protection goals and community values established in the Hangtown Creek Master Plan, which was unanimously approved by the City Council in 2000, have been incorporated into the proposed project. The commenter emphasizes the extensive community effort invested in developing the plan and asks whether the project includes measures to protect the creek, enhance aesthetics and community character, and reduce flooding.

The proposed project, as part of the design, would incorporate several features that would protect Hangtown Creek, enhance aesthetics and community character, and reduce flooding potential in the area. Section 3.4.5 Landscaping and Lighting of the REIR, describes how the project area would incorporate landscaping that would match the Historic Downtown District of Placerville and would also include lighting features on the new bridge to promote safety. The cork oak would be retained as part of the proposed project to maintain existing community character and Mitigation Measure AES-1 would be implemented and would include a tree palette consistent with guidance in the Placerville Main Streetscape Design Development Plan. The City will further develop the architectural and landscape treatments, including appropriate colors, materials, planting types, and other aesthetic features, during PS&E. Consistent with the project's approach to final aesthetic design, these treatments will be discussed through the public design process before they are finalized. Refer to Global Response 6 regarding final design and landscaping.

Best Management Practices (BMPs), such as a Stormwater Pollution Protection Prevention Plan (SWPPP) (see Section 4.7 Hydrology and Water Quality of the REIR) would be implemented to protect Hangtown Creek from runoff during project construction activities. Riparian habitat in the project footprint along Hangtown Creek would need to be removed; however, Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR) would be implemented to obtain a no net loss of riparian habitat due to project construction activities and would include revegetation at a 3:1 ratio within the watershed or through the purchase of similar habitat value from a USACE-approved mitigation bank.

As described throughout the REIR, the proposed project incorporates design features that would adequately complement community values of the project area and preserve the Hangtown Creek watershed. No change to the environmental impact conclusions of the REIR is necessary in response to this comment. No revision to the environmental analysis of the REIR is necessary in response to this comment.

The *Preliminary Hydraulic Study* that was prepared for the proposed project indicates the new bridge is designed to meet and exceed 50-year and 100-year flood flow requirements, with 2.29 feet of freeboard clearance under the 50-year flood scenario and 1.53 feet of clearance under the 100-year flood scenario. The 2.29 feet of clearance exceeds Caltrans design requirements, and the additional freeboard provides resilience to the potential effects of historical flooding and debris flow that have occurred within the project site. The proposed design of the bridge lowers water surface elevations

upstream of the bridge and water flow conveyance through the bridge would also improve.

LR5-2: The commenter is requesting details on whether the triangular area east of Clay Street will include a garden, shade tree, stone planter, and irrigation, and how these features would contribute to a welcoming entrance to the Clay Street neighborhood. The commenter also asks that the project consider Community Pride's plant list sampler, the Fish & Game-approved native plant list, and the City's master plant list when selecting shade trees and native plants for the area along Hangtown Creek.

As described in the REIR, the project site would include landscaping that would be consistent with City guidance; refer to Table 4.8-1 Project Consistency with General Plan Land Use Policies. In addition, the REIR also includes streetscape and landscape treatments intended to reinforce the visual character of the surrounding area (Section 4.1 Aesthetics), while also including revegetation for the riparian area as identified in Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR). It should be noted that final landscaping plans would not be developed until the PS&E stage of the proposed project, and the City will coordinate with interested groups to determine the appropriate plant palette, as discussed in Global Response 6. Refer to Global Response 4 and Response LR5-1 for information on architectural and landscape treatments. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR5-3: The commenter requests that a description be provided of how the Druid Monument will be placed so pedestrians can safely view it up close and placed in a way to enhance this entrance to downtown Main Street.

Please refer to Chapter 3 Project Description Section 3.4.4 Druid Monument Relocation of the REIR that describes how the Druid Monument will be relocated as part of the proposed project and measures developed to protect the monument. The Druid Monument would be moved to a new raised concrete protected pedestrian refuge island on Main Street, where it can be safely viewed up close by the public with minimized potential for collision with vehicles. The proposed new location for the Druid Monument is approximately 45 feet west from its current location, while still remaining within the intersection, respectfully holding to its historical intent. Relocation of the Druid Monument to a protected pedestrian refuge island is supported by the UAOD, Historic Monument Committee.

Please refer to Global Response 5 and Section 4.4 Cultural Resources, Threshold A for discussion, analysis, and mitigation measures regarding the relocation of the Druid Monument and safe accessibility for pedestrians. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR5-4: The commenter notes that the general plan encourages the uncovering of Hangtown Creek and requests information on how the proposed project will be consistent with this goal. The commenter also asks how much of the bridge would cover Hangtown Creek and if any measures would be implemented elsewhere to remove the same amount of coverage elsewhere along the creek.

The commenter is specifically referencing “Goal G: To promote the visual enhancement of Broadway Policy 3. The City shall encourage the uncovering of the Hangtown Creek in future developments” in the City of Placerville General Plan. Accordingly, the policies implementing Goal G, including a policy encouraging the uncovering of Hangtown Creek in future developments, are directed toward implementation of the General Plan’s visual enhancement objectives for the Broadway corridor. The Clay Street Bridge Replacement Project is located at Main Street and Clay Street and is not within the Broadway corridor.

Therefore, the referenced policy does not establish a requirement for the Clay Street Bridge Replacement Project to uncover Hangtown Creek or to provide an equivalent amount of creek daylighting elsewhere. Moreover, the policy uses the term “encourage” and does not establish a mandatory development standard requiring a specified amount of Hangtown Creek to be uncovered. Accordingly, the General Plan policy cited by the commenter does not require the proposed project to uncover Hangtown Creek. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR5-5: The commenter asks how access (including ADA access) to Hangtown Creek will be improved by the proposed project and how Hangtown Creek will be incorporated into the project.

The existing creekside viewing area located along the southeast bank of Hangtown Creek adjacent to the existing Clay Street Bridge will be removed to accommodate construction of the replacement bridge, realignment of Clay Street, and reconstruction of the adjacent parking lot. The City will reconstruct and relocate the creekside viewing area to the northeast bank of Hangtown Creek, adjacent to the El Dorado Trail. The relocated viewing area will consist of a flat area along the El Dorado Trail, providing a publicly accessible, ADA-compliant, location from which visitors can view and enjoy Hangtown Creek. The relocated viewing area is intended to continue the recreational and creek-viewing function of the existing facility and fulfill the intent of the State Department of Water Resources grant funding originally used to construct the existing viewing area. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR5-6: The commenter asks how the project will meet the General Plan goal of “the city shall make every effort to protect riparian vegetation. To this end, buildings and improvements will be set back from watercourses.”

Please refer to Table 4.8-1of the REIR which references City of Placerville General Plan, *Section VII. Policy A.4*. Section 4.8 Land Use and Planning of the REIR specifically considered the General Plan direction that the City make every effort to protect riparian vegetation and concluded that the proposed project is consistent with that policy because the proposed project will would not add new features that require setbacks from Hangtown Creek and would revegetate disturbed areas with native riparian vegetation. In addition, Mitigation Measure BIO-3 (formerly Mitigation Measure

BIO-5 in the REIR) further requires revegetation within the riparian corridor of Hangtown Creek. No revision to the REIR is necessary in response to this comment.

LR5-7: The commenter expresses opposition to removing the creekside park and requests clarification on whether the existing irrigation line will be retained. They note that landscaping exists on both sides of the creek and suggest that retaining the irrigation line could support a stormwater garden, accessible side access to the fish observation area, shade trees, and other beautification improvements.

As described in the REIR, the proposed project would require removal of the existing creekside viewing area and relocation of it to northeast bank of Hangtown Creek, adjacent to the El Dorado Trail. This area would be revegetated and relandscaped in accordance with applicable City requirements and plans as part of the proposed project in accordance with Mitigation Measure AES-1 and Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR). Please refer to Global Response 4 for visual quality and Global Response 6 for landscape design. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR5-8: The commenter expresses interest in extending the El Dorado Trail to Bedford Avenue as a potential mitigation measure and seeks information about whether existing irrigation near the El Dorado Trail and Clay Street will be maintained to support landscaping through to Locust Avenue. They also ask whether any foreseeable future projects, such as a parallel road to Main Street or US 50 expansion, could prevent trail extensions or the relocation of the park within the study area.

The El Dorado Trail extension is not part of the project design nor is it in the scope of the proposed project. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR5-9: The commenter expresses concern that a long-standing community creek restoration effort has been repeatedly relocated due to infrastructure projects and has been unable to return to the Clay Street area despite earlier commitments. They request that the existing water supply be maintained to support future landscaping and creek restoration, and that any project mitigation efforts be focused on the creek corridor between Bedford Avenue and Locust Avenue where impacts have occurred.

The proposed project would include landscaping and irrigation as described in Section 3.4 Proposed Project, Mitigation Measure AES-1 in Section 4.1 Aesthetics, and Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR) of the REIR. The proposed project is between Bedford Avenue and Locust Avenue, within this corridor. Please refer to response to comment LR1-6 for details regarding revegetation after proposed project construction and the location of the revegetation. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR5-10: The commenter requests that the City include Community Pride in mitigation implementation and coordination as a consulting party. The City appreciates this comment. Please refer to Global Response 6 regarding final design and landscaping. Please refer to Global Response 7.

The commenter is referred to Section 4.4, Cultural Resources, of the REIR for a discussion of consultation conducted for the project pursuant to Section 106 of the National Historic Preservation Act. Section 106 consulting-party status is a specific role established through the federal historic preservation review process and is distinct from the broader public participation process conducted under CEQA or the City's consideration of community input during project design. The subheading in Chapter 8 has been changed to reflect this distinction and now reads as:

Section 106 Consulting Parties

The City recognizes that Community Pride has institutional knowledge of the project area and an interest in its visual and landscape character. The project will continue to advance through the PS&E phase, during which detailed landscape, architectural, aesthetic, and streetscape elements will be further developed. The commenter's request for Community Pride to remain involved and provide input regarding these elements is noted and may be considered as the project proceeds through final design. The comment does not identify a deficiency in the environmental analysis or new information requiring revision of the REIR.

7.3.4.11 Comment Letter LR6: Debra Power

Letter Response 6

Debra Power
6321 Greyling Way
Pollock Pines, CA 95726

March 12, 2024

Melissa McConnell
Interim City Engineer
3101 Center Street
Placerville, CA 95667

Re: Clay Street Bridge Replacement REIR

Dear Ms. McConnell,

I am writing in regards to the REIR for the Clay Street Bridge Replacement. For ease of reading my responses, I have quoted sections of the EIR document in italics followed by my responses. Thank you for your attention to our community's concerns and comments: LR6-1

EXECUTIVE SUMMARY
Section 1.4.2 (Section 3.3) Project Objectives. Dewberry Engineering listed 5 objectives that meet CEQA. Objectives such as "*pedestrian and bicyclist access and safety*," "*Minimize impacts to adjacent properties*," and "*Preserve and retain the existing overall historic character"* were included. The implication is the natural environment alongside and within Hangtown Creek is not considered a priority. Is minimizing and mitigating the environmental impacts of natural waterways not included as an objective for EIR's? Is wildlife habitat protection not an objective? In "*minimizing impacts to adjacent properties,"* why is the creekside park not included as adjacent? LR6-2

Section 1.4.3 Project Characteristics / Section 3.4 Proposed Project. / 3.4.1 Clay Street Hangtown Creek Bridge. The proposed "*Bridge length would be approximately 37 feet, with an approximate 40-foot-width to accommodate travel lane, shoulders and sidewalks… a two-lane roadway with standard sidewalks on both sides of the road for pedestrian connection to the El Dorado Trail as well as to the neighborhoods north on Clay Street. The new bridge width would accommodate either shoulders or Class III bicycle facilities*." I am concerned about the environmental impacts of increasing coverage of Hangtown Creek. Will coverage of Hangtown Creek be 40 feet or 44' 4 inches? If the existing bridge is 17 ft wide and the new bridge will be 44' 4", that is an additional coverage of 27.3' over Hangtown Creek. On-site mitigation or daylighting should occur on our creek. No specific mitigation measures are mentioned about daylighting Hangtown Creek. Can our community be assured that mitigation of increased coverage, with daylighting, will not be transferred to other communities by purchasing mitigation credits? Are standard sidewalks on both sides of the bridge necessary? Couldn't we funnel pedestrians into one lane to reduce width and coverage of Hangtown Creek? Is there anything else that could be trimmed to reduce coverage? LR6-3

The goal to "*Reconfigure the Ivy House parking lot into two separate parking lots on each side of the realigned Clay Street*." **Section VII. Policy D.3:** "The City shall promote the installation and maintenance of landscaping in public and private areas… and street beautification programs." **City of Placerville Development Guide Chapter VI. Landscape Design Guidelines…** "Driveways and street intersections require special plantings and accent treatments and should clearly identify these nodes…Focal elements…such as water features, public art, or other monumentation are encouraged…" Aside from protecting the cork tree/planter box, there appears to be very little beautification efforts included in this plan. The project would be more palatable to the community with additional planter boxes and shade trees in the parking lot. LR6-4

Also stated is "*Reconstruction of the El Dorado Trail where it crosses Clay Street*." Located north of Hangtown Creek, there appears to be minimum impacts to the trail. However, if the authors are planning to mitigate the loss of the mini-park by moving it north of Hangtown Creek, the impacts will increase LR6-5

significantly. For example, the viewscape from the north will be severely impacted. Views of our efforts to create a natural, riparian environment would be marred by a vertical retaining wall in the background. Particularly, if the bridge and parking lot is to be raised to grade, this wall will become even more of a visual eyesore. I estimate the wall will be 15-20 feet tall. What would the height of the wall be exactly? LR6-5

2.2.1 Issues to be Resolved. "*The Draft EIR, or in this case the REIR, adequately describes the environmental impacts of the project…The recommended mitigation measures should be adopted or modified, or…Additional mitigation measures need to be applied*." The REIR does not adequately describe the visual impacts that such a large, imposing vertical wall will have. The mitigation measures do not compensate for the lost setbacks our community has worked to protect for decades. Offsite mitigation is unacceptable. LR6-6

3.2.2 Environmental Setting. "*The banks of Hangtown Creek vary in composition from natural embankment to concrete walls of assorted construction. Existing natural vegetation is limited to the banks of Hangtown Creek. A small creek side viewing area is located along Hangtown Creek north of the Ivy House parking lot*." Albeit slow, protection efforts of Hangtown Creek continue to date. Preservation of the "*creek side viewing area*" is important to our community. It is the only viewing area that meets ADA. LR6-7

3.4.3 Ivy House Parking Lot. "*…the Ivy House parking lot would be bifurcated and reconfigured into two separate parking lots. The proposed parking lots would continue to be owned and maintained by the City*." There is no accommodation for trees to cool the parking lot in the hot summer. Our community would be better served with the aesthetic and cooling benefits of trees, even if at the expense of a few more parking spaces. This loss could be offset by the City's acquisition of the net increase of parking with the addition of Locust Street. Volunteer groups such as Community Pride can be called upon to continue maintenance of beautification, landscaping, and planter boxes in the parking lot. LR6-8

"*The current creekside viewing area overlooking Hangtown Creek at the northwest corner of the Ivy House parking lot and the path leading to the viewing area would be removed and elevated to street level and relocated north of Hangtown Creek along the El Dorado Trail*." **Section VII. Policy A.4:** "The City shall make every effort to protect riparian vegetation. To this end, buildings and improvements will be set back from watercourses." The original DWR grant for the mini-park was awarded to the City of Placerville in order to accommodate for the undermined vertical retaining wall that collapsed in 1994. The Plan was designed to embrace the riparian environment, create an ADA-compliant public space, accommodate for fish viewing, and provide terracing that would emulate a more V-shaped channel for flood control. The mini-park is bound to the north by the remnants of the failed wall. While preserving the historic wall, the terraced landscaping provided a simulated setback from the creek. Our volunteers had hoped this project thirty years ago would serve as the beginning of a process of encouraging City officials, merchants, naturalists, and community volunteers that reasonable setbacks, environmental protections, and safe water conveyance could be balanced with urban needs. Unfortunately, vandalism, homelessness, lack of police presence, inadequate lighting, and drug-use scared away members of our most active volunteer group, Community Pride. Moreover, our group was further discouraged by continual reminders that this impending Project would remove the park anyway! If protected, Community Pride members would be happy to resume maintenance of the mini-park/creek viewing area as well as planter boxes, and trees for shading. LR6-9

Another, longer, taller, more imposing vertical retaining wall further encourages encroachment, allowing flooding of Hangtown Creek to persist. What is the life expectancy of the new wall? With climate change resulting in more flood events, Hangtown Creek could also undermine this newer, bigger vertical wall. Raising the wall and bridge to accommodate 100-year flood events is still insufficient for 500-year flood events. Also, another vertical wall will bolster flooding because of extensive "*concrete walls of assorted construction*" east and west of the project. LR6-10

In paving the parking lot, it appears pavement will occur up to the stream terminating at upwards of 15-20 ft tall vertical retaining walls. This is a severe undermining of our community's attempts at promoting setbacks from Hangtown Creek. Setbacks were not specific for the Placerville General Plan and varied in the Hangtown Creek Master Plan (HTCMP) because some areas are understandably too constricted. LR6-11

However, this is not the case for this project. The existing creekside park sits above the remnants of the failed vertical retaining wall. It provides somewhat of a horizontal setback of more than 25 ft. on the east side of the bridge. Given issues such as polluted runoff from pavement and erosion, shouldn't this setback be protected on-site? In the present-day awakening of environmental issues, there is no valid justification for reducing the setback from Hangtown Creek. Instead, our community should be maintaining, or better yet, increasing setbacks for the riparian zone. The HTCMP calls for setbacks of 15-25 feet within the City. Reducing setbacks is also out of compliance with the Placerville General Plan. LR6-11

What is actually planned for the relocation of the park north of Hangtown Creek? The renderings show only two park benches. Is the author's opinion that two park benches will serve as adequate mitigation of the lost park, ADA compliant public space, proper setbacks, water conveyance during flood events? Will the new viewing area meet ADA? Will there be a ramp down for access to viewing the creek? LR6-12

3.4.5 Landscaping and Lighting. "*The proposed project would include new landscaping along the north side of Main Street at the proposed Main Street/Clay Street/Cedar Ravine Road intersection*." The Project Renderings indicate much more attention to lighting than landscaping. Had there been better lighting and police enforcement, the mini-park might have been better protected as a green space. Without sufficient lighting and police presence, volunteers historically felt unsafe in maintaining beautification efforts. Despite this, the park is still used by the community, particularly those with disabilities.

Figure 3.4.2 shows only one small grassy area on the northwest corner of the parking lot. Other than the cork oak and planter, why is this the only green space provided? The community will be better served with the aesthetic benefits and cooling effects of more planter boxes, trees, and vegetation, rather than one small grassy area. LR6-13

3.4.8 Construction Activities. "*Clearing and grubbing and tree removal (approximately 20 trees) or trimming as needed.*" **Section VII. Policy A.1:** "The City shall protect and manage Placerville's tree cover for ecological, aesthetic, and economic reasons." The trees targeted for removal are mature. Trees near the bridge will understandably have to be removed. However, if the mini-park (viewing area) can be preserved, then cutting down all 20 trees can be reassessed. The 1:1 ratio for replacing mature trees should be increased to at least 3:1? If the curve of Clay Street was designed to occur further south of the bridge, more of the creekside park might be preserved. LR6-14

"*Demolition of bridge, existing retaining walls, sidewalks, and asphalt… stream diversion would likely be late April through October, depending on the permit restrictions imposed by the resource agencies*." What are the impacts to trout spawning that generally occurs January-June? LR6-15

4.1 Aesthetics. 4.1.2.2 Local Character. "*…Views of Hangtown Creek itself, do not exhibit special visual qualities. The creek channel is an assortment of concrete walls, sewer and utility lines and natural bank…" "Less than Significant*" findings are proposed because this REIR has focused its attention on the Main Street viewscape. I contend that the Ivy House Creekside Park does provide a scenic view of Hangtown Creek that is superior to an imposing vertical retaining wall. The CA Department of Fish and Game documented an average of 650 trout per mile, which qualifies Hangtown Creek a Class I Trout habitat for public viewing. LR6-16

There is a small dedicated group of volunteers who have worked for decades to stop the construction of "*concrete walls, sewer and utility lines*" and restore the natural setting along Hangtown Creek. Believe it or not, we have made progress! We continue to remind City officials how quaint our town would be had our predecessors used the creek as the front door to businesses instead of a urinal. The lack of appreciation for the stream, thoughtless human impacts, and encroachment of the riparian corridor, however, does not make it less of an asset! It would be insulting to insinuate the existing "*concrete walls, sewer and utility lines*" are an open invitation to continue building eyesores and yet another taller, more imposing vertical wall.

"*Riparian vegetation along Hangtown Creek provides visual relief against the backdrop of US 50, which is elevated over Clay Street, for viewers south of Hangtown Creek*." Maintaining this visual relief after this project is complete is very important to this community. LR6-16

4.1.4.1 Methodology. "*Key View 1: KV 1 faces southbound Clay Street at the intersection with the El Dorado Trail. The existing visual quality of this key view is moderately high*." This viewscape will be severely impacted when the bridge is raised to grade level, thus raising the height of the vertical retaining wall south of Hangtown Creek. This view is completely devoid of vegetation. Since deterioration begins the day it is built, I contend the viewscape will be severely impacted with time.

Again, complete removal of the creekside park and replacing it with the wall that encroaches the stream will further restrict the natural viewscape. Removal of the entire park is not necessary. The west end of the park could be altered while ¾ of the east end is preserved. Park access could be moved to an entrance from the southeast side (northeast edge of the parking lot) with the ramp terminating beneath the bypass. Again, preservation of the park would aid with water conveyance during flood events. Since the "*visual quality is moderately high, and extraordinary mitigation practices may be required*," we need to protect as much of the park as possible, maintain, and not reduce, existing setbacks. Additionally, "*landscape treatment could take longer than five years to mitigate*." It will take more than five years for new trees to mature. LR6-17

"*The Ivy House parking lot and overhead utilities are visibly intrusive against the foreground of Hangtown Creek; however, this is a typical representation of the downtown edge area*." Just because our City has historically allowed these "*visibly intrusive*" utilities doesn't mean that we should continue to ignore the natural environment and potential for treating it as an asset.

Key View 5: "*KV 5 faces eastbound along El Dorado Trail. The unity and intactness of the vegetation and creek, combined with the El Dorado Trail, come together to from a moderately cohesive riparian landscape in the background. Views of Hangtown Creek itself, do not exhibit special visual qualities and detract from the unity of the view. The creek bank and bed included an assortment of concrete walls, sewer and utility lines and access points, and natural bank*." Again, just because Hangtown Creek has historically been undervalued, does not mean that our community cannot devise a plan that demonstrates the balance of urban needs with natural aesthetics. LR6-18

4.1.5 Project Impacts: Threshold a. Would the proposed project have a substantial adverse effect on a scenic vista? "*...The proposed project site or vicinity do not contain areas considered to be scenic vistas, and public views are limited to the immediate downtown area, and the impact level is less than significant."* Although the viewing area for our little creek is a work in progress, our community still values it. Again, if the entire creekside park is removed, the installation of two park benches north of the creek is insufficient mitigation for the loss of the park. This is a reversal to what our community groups are trying to accomplish. LR6-19

Threshold b. Would the proposed project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? **"***...Approximately 20 trees would be removed ... along Hangtown Creek...any trees removed within the proposed project area would be replaced at a minimum 1:1 or higher...*" Again, if the creekside park is protected, removing all 20 trees would not be necessary. For mature trees, the ratio should be at least 3:1. It will be many years before the new trees provide the cooling effects of these existing trees. LR6-20

Threshold c. Would the proposed project substantially degrade the existing visual character or quality of the site and its surroundings? "*The General Plan recognizes Hangtown Creek and historic buildings in historic downtown as scenic resources. The General Plan includes numerous policies intended to protect those resources as well as the overall visual integrity of the downtown area*." **Section V. Policy D.1:** "The City shall make every effort to protect riparian vegetation. To this end, buildings and improvements shall be set back from watercourses." The improvement and resulting parking lot encroaches upon the south bank of Hangtown Creek. This is not compliant with "*setback from water* LR6-21

courses" as set forth in the General Plan. Again, the southern view of the riparian zone will be severely impacted if the large, impending wall is allowed. Again, the General Plan and HTMP ensures setbacks from Hangtown Creek. In this plan, the setbacks are being reduced by removal of the mini-park and is being replaced with yet another vertical retaining wall that Hangtown Creek continues to undermine. And again, there is little to no specific plan for mitigating the loss of the park, other than one illustration of two park benches facing south in Key View 1. LR6-21

4.1.5 OPERATION. Key View 1 - Intersection of Clay Street and the El Dorado Trail. *"The potential visual change of KV 1 resulting from the proposed project would be moderate…*" **Section V. Policy D.11:** The City shall take action to ensure the protection of Hangtown Creek and the creek area. "*The proposed project is consistent as it enhances or preserves the visual amenities of Hangtown Creek…access to views of these amenities.*" Key View 1 shows the starkness associated with an imposing vertical wall encroaching on the streambed on each side of the bridge. Further encroachment of the creek should be controlled. Again, the wall could be altered to include setbacks; at the expense of a few parking spaces, grade level could be reached by segmented terracing. We must learn to balance flood control, aesthetics, environmental protection with the urban need for parking. LR6-22

"*…Approximately 20 trees would be removed as part of the proposed project to accommodate the bridge realignment along Hangtown Creek. Removed trees would open up views of the reconfigured Ivy House parking lot and the new intersection at Main Street and Cedar Ravine Road; however, any trees removed within the proposed project area would be replaced at a ratio minimum ratio of 1:1 or higher…"* The visual impact of removing 20 trees is significant for this area. "*Removed trees would open up views*" is not an improvement, particularly looking south from the trail. Again, protecting the mini-park would protect many of these trees. The cooling effect of the tree canopy would be maintained. LR6-23

"*The addition of sidewalks on both sides of Clay Street would improve the pedestrian and bicycle facilities. This would enhance the prominence of this pedestrian scale of KV 1*." Presently, there is only one sidewalk on the west side of the bridge. Can coverage of Hangtown Creek be reduced with only one sidewalk? What is the plan for daylighting Hangtown Creek elsewhere in order to mitigate the extra coverage of the riparian corridor? Offsite mitigation or mitigation bank credits is unacceptable for our community. LR6-24

Key View 4 – South of the intersection of Main Street along Cedar Ravine Road. "*The potential visual change of KV 4… would be moderately low… slightly decrease the prominence of the greens and earth tones of the hardwood trees by increasing the prominence of grays and monotones… provide a direct sightline to mature trees...Approximately 20 trees would be removed…along Hangtown Creek. Removed trees could potentially open up views of the site from US 50…any trees removed …would be replaced at a minimum 1:1 ratio or higher…*" Again, removing all 20 trees along Hangtown Creek is unnecessary and would negatively impact the viewscape from "greens" to "grays and monotones." Removing these trees and "*opening views from Highway 50*" is not a benefit of this project. Again, trees should be replaced at a minimum of at least 3:1 as the canopy will be impacted for many years. LR6-25

Key View 5 – West of the Clay Street Bridge along the El Dorado Trail. "*The potential visual change would be moderate… slightly increase the prominence of the roadway… Approximately 20 trees would be removed as part of the proposed project to accommodate the bridge realignment along Hangtown Creek…any trees removed within the proposed project area would be replaced at a minimum 1:1 or higher…*" Again, the "*visual change*" from removing all trees on the north slope of the riparian corridor from the bridge to the Ivy House building IS more than a "moderate" impact. This image shows a complete decimation of the natural environment on the south bank of Hangtown Creek. LR6-26

"*The removal of the existing Clay Street Bridge footing and arch from the creek opens the views and symmetry of Hangtown Creek for El Dorado Trail users. The proposed bridge footings and new retaining wall formline, pattern, and color would mimic the existing sections of the Hangtowm Creek retaining walls, thereby, tying the new construction into the existing environment*." Spelling error. LR6-27

"*The addition of sidewalks and lighting on both sides of Clay Street would improve the pedestrian and bicycle facilities…enhance the prominence and safety… The widening of the Clay Street Bridge to accommodate two-lanes...”* Again, coverage of the creek can be reduced with only one sidewalk on one side of the bridge. Where will Hangtown Creek be daylit to mitigate this coverage? LR6-28

Figure 4.1-6. "*Overall, visual change is expected to be moderate…consistent with the local regulatory framework…have moderately low negative change to the visual resources…similar in the amounts of hardscape, similar in scale, and similar in dominance…This change is considered potentially significant*." Figure 4.1-6 indicates there will be significant changes to the riparian corridor. The image shows a complete decimation of trees and vegetation on both north and south banks of Hangtown Creek throughout the entire project. This is significant for the natural environment, wildlife habitat, viewscape, and flood control. To retain "*similar amounts of hardscape*" at the expense of the natural environment is not appropriate in this day and age. Removal of vegetation along the creek bank is not "*consistent with the local regulatory framework*" such as the General Plan and HTCMP. LR6-29

Mitigation Measure AES-1. … streetscape and landscape design concepts: "*Tree species … of the Main Street Streetscape Design Development Plan (incense cedar, tulip tree, valley oak, red oak, and Chinese Pistache) … adjacent to parking lots to provide shade.*" In addition to the Main Street Streetscape Design Development Plan, the recommended plant list of native vegetation in the HTCMP should be included when selecting trees and vegetation. Because of allergens and their invasive nature, Incense cedars should be excluded. The impact on the number of parking spaces notwithstanding, trees in planters should be included within the parking lot to provide cooling during hot summers. LR6-30

Mitigation Measure AES-2. "*The redwood tree at the northwest corner of the Clay Street Bridge shall be evaluated by an ISA-certified arborist…If it is determined the tree will not pose a hazard and can remain in place, the tree shall be protected in place…set forth in Mitigation Measure BIO-5…to protect the redwood tree during construction*." Why would the tree pose a hazard if it is not encroached upon? LR6-31

Mitigation Measure AES-3. "*Vegetation clearing will only occur within the delineated project boundaries and as necessary to construct the project. Trees located in areas along the edge of the construction zone will be trimmed, and only those trees that lie within the active construction areas and cannot be avoided will be removed. Replacement of removed trees within the active construction area will be replaced at a 1:1*." The drawings, maps, and renderings show the entirety of Hangtown Creek riparian zone devoid of trees in the project area. Does that mean the entire length of Hangtown Creek lies "*within the active construction area and cannot be avoided*?" The replacement of 20 trees was stated at a "1:1 or higher ratio" in previous statements. Here, they will be replaced at a 1:1. Is this an oversite, or will mitigation be negotiated to at least 3:1? LR6-32

4.3.2 Environmental Setting. *"… urban (developed) habitat with a narrow strip of valley foothill riparian habitat … along the northern bank of Hangtown Creek. A series of retaining walls have been constructed along the south bank and rip-rap and other retaining walls… on the north bank of the creek. Land use…residential and medium- to high-density commercial development*." Protection of the small, riparian corridor is essential to a balanced approach to growth. Historically, we have allowed rip-rap, retaining walls, and sewer pipes to create an eyesore for the natural setting. That does not mean we should continue with status quo. I contend this Project could become a demonstration area showing urban growth is balanced with protection of the natural environment. Even if we don't get the maximum number of parking spaces, wouldn't balancing urban needs with natural aesthetics and habitat protection be a win for this community? LR6-33

4.3.2.1 Natural Communities.

TABLE 4.3-1 HABITAT TYPES WITHIN THE BIOLOGICAL STUDY AREA. "*Riverine (Hangtown Creek) - Intermittent (0.27acres, 1% of project…The ordinary high-water mark (OHWM) determination was…approximately 8 feet. Hangtown Creek was flowing during all site visits.")*" **Section V. Policy D.3:** "New development shall be sited to protect native tree species, riparian vegetation, important concentrations of natural plants, and important wildlife habitat, to minimize visual impacts and LR6-34

to provide for continuity of wildlife corridors." **Section V. Policy I.4:** "The City shall condition development approvals to protect natural features such as rock outcrops and trees." **HTCMP Goal 2. Policy 1.** No new structures improvements, or grading activities shall be allowed that do not enhance riparian habitat." On-site mitigation of native trees and vegetation as well as visual impacts are in question. Hangtown Creek is a perennial, not intermittent, stream. It was documented by the CA Department of Fish & Game as having approximately 650 trout per mile which qualifies it as a Class I Trout Stream. LR6-34

4.3.2.2 Wetlands and Other Waters. *Riverine (Hangtown Creek) – Intermittent Riverine Intermittent Streambed Seasonally Flooded. "Hangtown Creek is a perennial channel... Flows… are supplemented by urban runoff and landscape irrigation…retaining walls and rip-rap…graded slopes…A sewer main follows the alignment of Hangtown Creek. The bed of Hangtown Creek is mostly bedrock. Vegetation consists of white alder, willow, Fremont cottonwood, and hydrophytic herbs.* Though underappreciated, Hangtown Creek is potentially an aesthetic, biologic, and natural asset to this community. If treated as such, it could serve an economic benefit for our community. For example, by putting their stream as the focus of their little town of Ashland, Oregon, the environment was transformed into an economic asset. Why can't we do the same by embracing this natural benefit rather than continuing degradation because raw sewage, sewage pipes, rip-rap, and vertical retaining walls have historically been the norm? LR6-35

"*Cedar Ravine empties into Hangtown Creek at the Clay Street Bridge…that flow freely…and transitions to a closed conduit constructed of various materials and geometrics with varying ages… to the outfall at Hangtown Creek. Cedar Ravine is… an intermittent channel...flows…are supplemented by urban runoff and landscape irrigation...*" What measures will be taken to keep newly constructed walls from being undermined by increased water that "*outfalls at Hangtown Creek*?" LR6-36

4.3.2.4 Animal Species. *"Hangtown Creek does not provide suitable habitat for this species most of the year due to its ephemeral nature, lack of suitable basking structure, heavy canopy shading, lack of forage (aquatic vegetation, fish, and amphibians), and urban setting. Although Hangtown Creek, within the BSA, is very poor habitat, it does provide a potential movement corridor for western pond turtles*." Hangtown Creek is a perennial stream, not "ephemeral." Hangtown Creek does not necessarily "*lack...forage (aquatic vegetation, fish, and amphibians*) because it is a Class I trout stream. Though it sits on bedrock in many places, riffles do exist for trout reproduction. LR6-37

MIGRATORY BIRDS AND RAPTORS. "*Common raptors…and birds…commonly nest in large trees that overhang, or are in close proximity to (within ¼ mile), aquatic habitats such as rivers, streams…Large trees provide suitable nesting habitat due to their proximity to nest building material as well as optimal foraging habitat*." **HTCMP Goal 2. Policy 2.** "Encourage increased shading throughout the creek area to maintain water temperatures in Hangtown Creek that support the native cold-water fishery." "*The completed project would enhance existing riparian habitat and maintain adamant shading over Hangtown Creek and increase nesting opportunities*." This is another argument to protect trees in the creekside park and along the north bank of Hangtown Creek…Even if they are not presently using the trees for nesting, cutting them will ensure access is denied to birds and raptors. Moreover, "*adamant shading over Hangtown Creek and nesting opportunities*" would surely be lost when mature trees are cut down. LR6-38

Threshold b. Would the proposed project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS.?

VALLEY FOOTHILL RIPARIAN. "Approximately *0.72 acre of riparian forest is on the northern bank of Hangtown Creek within the BSA. The retaining walls on the south bank eliminate much of the bank habitat. The Clay Street Bridge…would result in a permanent, direct impact of 0.04 acre of riparian habitat…removal of four white alder trees…understory shrubs and herbaceous species (Table 4.3-3 and Table 4.3-4). The loss of riparian vegetation is a potentially significant impact on aquatic habitat in Hangtown Creek*." **Section V. Policy I.5:** "The City shall preserve creeks in as natural a state as possible." Could the "*retaining walls on the south bank*" not be reconstructed such that it continues to LR6-39

"*eliminate much of the bank habitat?"* A segmented retaining wall south of the creek could restore a more natural streambank as well as help with flood control. LR6-39

MONTANE HARDWOOD-CONIFER FOREST. "*There are approximately 3.16 acres of montane hardwood-conifer forest in four distinct areas in the BSA; tree canopy is patchy. The construction…would result in a permanent, direct impact of 0.01 acre of montane hardwood-conifer habitat…The loss of montane hardwood-conifer habitat is a potentially significant impact on common terrestrial species such as birds…tree-dwelling mammals*." Again, the canopy loss can be minimized with park protection. LR6-40

Current riparian vegetation, oaks, and other native tree species will be retained to the extent feasible. "*To ensure no net loss of riparian habitat, the City shall create or restore riparian habitat that is of similar function and value to affected habitat. The permanent degradation of riparian and montane hardwood-conifer habitat will be compensated for at a 3:1 ratio within the watershed or through the purchase of similar habitat value from a USACE-approved mitigation bank. Preservation and restoration may occur on-site or within the watershed through a conservation agreement or off-site by purchasing mitigation bank credits*." Here, the compensation rate is 3:1 whereas it is 1:1 elsewhere in the document. Off-site mitigation is unacceptable. It is not appropriate for our natural environment to be further degraded and our mitigation credits to be used elsewhere in the state. On-site mitigation is essential! LR6-41

"*A planting plan will be implemented as detailed in a restoration plan approved by the CDFW. The plan will include performance standards for revegetation that will ensure successful restoration of the on-site riparian areas including replanting trees*." The HTCMP includes a CA native plant list that should be referred to. Will this planting plan be made to the public in time for commenting? LR6-42

"*The City shall compensate for the permanent removal of riparian and montane hardwood-conifer habitat vegetation associated with the bridge construction by replacing habitat at a minimum 3:1 ratio (e.g., 3 acres planted for every 1 acre removed) as well as associated native herbaceous species*." This mitigation must be along Hangtown Creek, not elsewhere with a mitigation bank. LR6-43

"*Effects of disturbance to Hangtown Creek and Cedar Ravine and the adjacent riparian corridor would be minimized by revegetating areas of temporary disturbance within the proposed project footprint with native vegetation. A planting plan, as required in Mitigation Measures BIO-5, would help to reduce impacts to Hangtown Creek and Cedar Ravine."* The aforementioned renderings show the north slope of Hangtown Creek devoid of vegetation and the southern bank completely encroached by the vertical retaining wall. What is the planting plan? LR6-44

"*Hangtown Creek is considered potentially jurisdictional. Removal of the … bridge and construction of the new bridge and its abutments would involve construction activities along the banks of Hangtown Creek. Based on the preliminary project design, rock slope protection (RSP) would be installed on the banks of Hangtown Creek and would result in permanent impacts of approximately 0.001 acre. This is a potentially significant impact and mitigation would be required."* ***Mitigation Measure BIO-6:*** *The City shall purchase credits from a USACEand/or CDFW-approved mitigation bank at a minimum 1:1 ratio (1 acre of habitat replaced for every 1 acre filled)*." Purchasing mitigation credits from a mitigation bank will be unacceptable for our actively-involved community. Volunteers have worked for decades to enlighten the community that Hangtown Creek is an asset to be celebrated. We cannot justify selling out our environment to another community? LR6-45

Threshold d. Would the proposed project 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?

4.3.6 Cumulative Impacts. "*Implementation of mitigation described in Mitigation Measures BIO-5 … Mitigation Measures BIO-6…would reduce the proposed project-specific impacts to a less than significant level*." Both mitigation measures could be "*less than significant*" as long as mitigation is kept on-site and not transferred to mitigation banks. LR6-46

4.4.2 Cultural Resources. ASSUMED-ELIGIBLE PLACERVILLE MAIN STREET HISTORIC DISTRICT. ***"****Replacement of the Clay Street Bridge would also require replacement of approximately 200 feet of the Hangtown Creek retaining wall on the south side of the creek…The section of the existing wall… is formed from concrete…with the Clay Street Bridge in the mid-1920s. The existing concrete wall segment…would be replaced with a new concrete structure faced with an aesthetic treatment to mimic the existing wall look…the loss of the concrete section of wall… does not adversely affect the qualities for which the Placerville Main Street District is assumed eligible*." If the historic wall must "*be replaced with a new concrete wall*," then it no longer holds historic benefit. The new wall should at least complement the new bridge abutment and wingwalls. A "*concrete structured face to mimic the existing wall*" just contributes to the piecemeal aesthetics along Hangtown Creek. Again, this project could become a demonstration of the potential of a well-coordinated, well thought out plan by the City and community instead of "*idiosyncratic feeling as a result of lack of a designed plan*." LR6-47

4.4.7 Project Impacts Threshold c. **Would the proposed project disturb any human remains, including those interred outside of dedicated cemeteries**? *"…unearthed during excavation activities, which could result in damage to these human remains… unearthed during excavation activities, which could result in damage to these human remains*." Redundant phrase should be edited out. LR6-48

GENERAL CONSTRUCTION PERMIT STORMWATER POLLUTION AND PREVENTION PLAN "*Certain projects are required to comply with the National Pollutant Discharge Elimination System (NPDES) general construction permit to manage stormwater runoff…handling of fuels and oils…spills and procedures for spill cleanup…spills on construction sites...*" After construction, how will stormwater pollutants be contained from sheeting off the impermeable paved surface of the parking lot? Although more costly, could permeable materials such as porous asphalt be used instead? LR6-49

4.7 Hydrology and Water Quality
CEDAR RAVINE. "*The Cedar Ravine culvert outlets at the creek and is integral with the south abutment/retaining wall of the existing bridge. Under existing conditions, based on hydraulic modeling as described above, the culvert conveys approximately 300 cubic feet per second (cfs) flow. For a 50-year storm, the model predicts the flow to increase to 381 cfs, and for a 100-year storm, 450 cfs. Roadway flooding during large storms is a result of the capacity limits of the culvert (Domenichelli 2023)."* Are these volumes of water sufficient to undermine the vertical retaining walls, wingwalls, and abutment beneath the bridge? What is the expected time frame before the onset of degradation? LR6-50

CLAY STREET BRIDGE. "*Existing channel banks are moderately steep to nearly vertical and heavily vegetated. Walls and hardened bank areas are present both up- and downstream of the Clay Street Bridge…Multiple utilities, including sewer lines, manhole risers, and a water line, run below or adjacent to the Clay Street Bridge. Multiple drain/culvert pipes discharge to the stream…Additional drainpipes are present at random intervals along retaining structures on both sides of Hangtown Creek (Taber 2007; Domenichelli 2023)."* Can it be assumed these unsightly drain pipes will be consolidated beneath the bridge abutment? LR6-51

4.7.2.3 Flooding. "*Hangtown Creek has been substantially constrained through the City as a result of adjacent development and existing aboveground trunk sewer lines. As a result, there has been a long history of flood problems. Because Hangtown Creek is constrained to a small area, large storm events are amplified…The floodway is the channel of a stream plus any adjacent floodplain area that must be kept free of encroachment so that the 1 percent annual chance flood can be carried without substantial increases in flood heights*." Again, segmented/terraced retaining walls would emulate the natural V-shape of the stream on both banks for water conveyance. This project could serve as the begin standardizing setback policies for future construction and improvements by merchants and residents. LR6-52

4.7.3.2 Hydrology and Water Quality. **State Plans, Policies and Regulations PORTER-COLOGNE WATER QUALITY CONTROL ACT**. "*…The State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boar (RWQCB)*." Board, not Boar? LR6-53

"If a state determines that waters are impaired for one or more components and the standards cannot be met through point source controls, the CWA requires the establishment of Total Maximum Daily Loads (TMDLs). TMDLs specify allowable pollutant loads from all sources (point, non-point, and natural) for a given watershed." What is the TMDL for runoff from impervious surfaces such as parking lots? Could more permeable materials be used? LR6-53

4.7.3.3 Regional Plans, Policies, and Regulations. OPERATIONAL IMPACTS. "*Clay Street at the bridge approach and the Clay Street Bridge surface would be widened compared to existing conditions, which would slightly increase the amount of impervious surface that would generate stormwater runoff containing urban pollutants…The proposed project would reduce the number of parking spaces in the Ivy House parking lot, so there would be fewer vehicles…which would be a source of pollutants*." **HTCMPM Goal 2. Policy 5.** Reduce stormwater-related flooding and damage to stream and wetland habitat, and increase infiltration." **HTCMP Goal 2. Policy 3.** "The City is encouraged to seek funding for the installation of filtration systems to treat stormwater run-off originating from existing parking lots." "*Funding for the proposed project has been programmed from multiple federal, state, and local sources including the HBP, RSTP Exchange, and local developer TIM fees*." Will this collaboration provide funding for permeable materials such as porous asphalt that would allow for percolation of stormwater? Additionally, by protecting the eastern side of the creekside park and maintaining a terraced landscape, we could also reduce stormwater runoff as storm water percolates through the mini-park soils and vegetation before contaminants can reach the creek. LR6-54

4.7.5 Project Impacts. Threshold b. 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 onsite or offsite? "*…Additionally, any temporary construction areas would be revegetated, as required through Mitigation Measure BIO-2*." Mitigation of vegetation at 3:1is preferred. No off-site mitigation credits. LR6-55

Threshold c. 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 site or off site? "*…potential…increase impervious surface…increase…surface runoff…potential to cause flooding on or off site...amount is not expected to be substantial…could increase surface runoff…potential to cause or exacerbate flooding on or off site; however, the Cedar Ravine drainage culvert, which outlets into Hangtown Creek, would be relocated and reconstructed, which would ensure capacity is maintained… LID features would be incorporated into project design, and there would be long-term maintenance and monitoring of the BMPs to ensure their effectiveness in reducing pollutants in runoff…MITIGATION MEASURES None Required*." **Section V. Policy A.5:** "The City shall require in new development sound anti-pollution practices to protect water quality." Mitigation measures should be required if the parking lot will terminate, and thus encroach, directly upon the creek. No increase in surface runoff should be allowed, particularly when there is an existing setback that could be protected. LR6-56

Threshold d. 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? "*The bridge… would be widened, and the Ivy House parking lot would be extended farther north…potential to increase the amount of impervious surface…generate stormwater runoff…amount is not expected to be substantial. Increases in…stormwater runoff have the potential exceed storm drain capacity...The Cedar Ravine culvert, which outlets into Hangtown Creek, would be relocated and reconstructed in conjunction with the bridge replacement, which would ensure capacity is maintained.*" Increasing an "*unsubstantial*" amount of impervious surface and thus stormwater runoff adds to the cumulative effects of flooding of Hangtown Creek. LR6-57

4.8.3.3 Regional Plans, Policies, and Regulations.
TABLE 4.8-1 PROJECT CONSISTENCY WITH GENERAL PLAN LAND USE POLICIES LR 6-58

Section VII. Policy A.5: To retain the natural landscape of Placerville, introduced plants in public and private landscaping should be subordinate to and compatible with existing natural vegetation. The use of

native and drought-resistant plants will be encouraged." "*...proposed project would result in a net positive impact due to invasive species removal…it is likely that invasive species would be removed and replaced by native plants*." If invasive species will be removed, can the document say so, rather than, "*it is likely that invasive species would be removed*?" LR6-58

Threshold d. Directly or indirectly, would the proposed project trigger parcel deterioration and consequent long-term vacancies that ultimately result in urban decay? *"…in 2014, the City acquired a parking lot on Locust Avenue…will provide approximately 25 additional spaces for public parking…intended to offset the loss of spaces at the Ivy House parking lot. The result…a net gain of approximately 11 public parking spaces*." It appears the Ivy House Parking lot is used less than 60% during the week. If this Project loses 16 parking spaces, the Locust parking area adds 25 spaces, and the net gain is 11 spaces, then protecting the mini-park would be a valid compromise. How many spaces would be lost if the mini-park was protected? Providing a setback from the stream, controlling runoff, flood control, a natural viewscape at the expense of more spaces for event parking would be an appropriate offset. Perhaps signage directing the public to Locust parking would provide overflow parking for events. LR6-59

Threshold b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? "*The proposed project would include sidewalks on both sides of Clay Street and allow for a Class 3 on-street bicycle facility along Clay Street to connect to the El Dorado Trail…Crosswalks would be located at the stop signs…*" Does Caltrans require sidewalks on both sides of the bridge? If not, could we reduce the coverage of Hangtown Creek with only one sidewalk? LR6-60

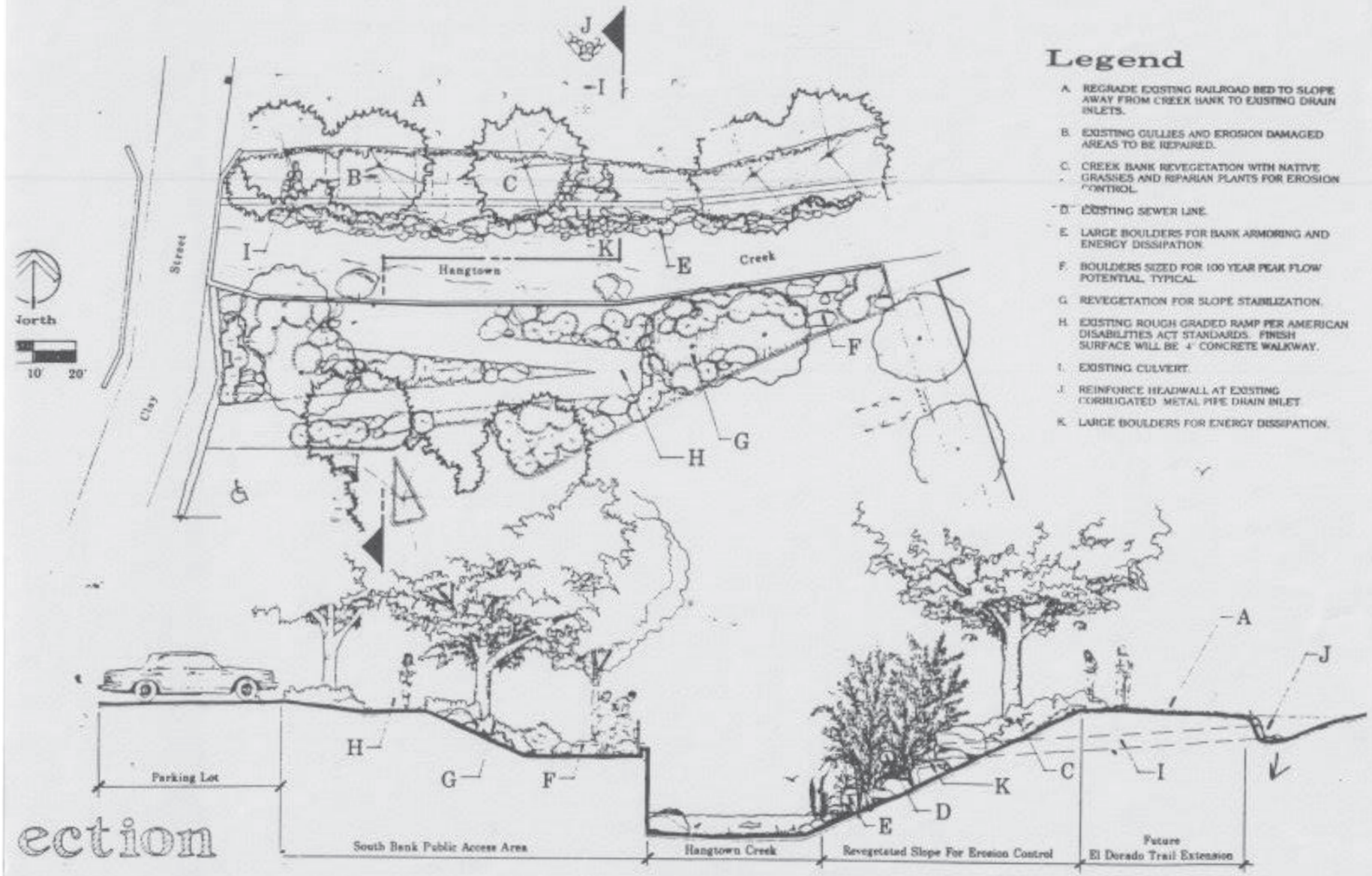
4.9.6 Cumulative Impacts. Section 3.6, Cumulative Projects. "*Among those is Cottonwood Phase 4 and 6, a residential subdivision on approximately 22.2 acres north of Clay Street and east of the Cottonwood Apartments…The proposed project…accommodate traffic…in a safe manor. The Cottonwood subdivision was required to contribute to the proposed project…however, it would not increase roadway volume capacity on Clay Street, Main Street, or Cedar Ravine Road. The proposed project is not growth inducing*." Is the subdivision required contribution commensurate with the impacts of increased traffic and air pollutants generated? Manner is misspelled as "manor." This statement seems inconsistent in that "*The proposed project is necessary to accommodate traffic generated by the Cottonwood Phase 4 and 6 Project in a safe manor (sp)."* But yet, *"it would not increase roadway volume capacity on Clay Street, Main Street, or Cedar Ravine Road."* These two statements appear contradictory, particularly if this project is not considered *"growth inducing."* LR6-61

6.5.1 Construct New Clay Street Bridge Parallel to Existing Bridge with Clay Street Realignment. "*This alternative would involve constructing a second bridge across Hangtown Creek and realigning Clay Street…a two-lane facility, with the existing bridge retained as a pedestrian/bicycle bridge…result in a greater aesthetics impact…additional feature across Hangtown Creek…increase the overall scale of the crossing and its visibility…more visually intrusive than a new replacement bridge*." I hope this option is presented only by requirements of the EIR and is not up truly being considered. Increased coverage of Hangtown Creek as well as the visual impacts make this option unacceptable. LR6-62

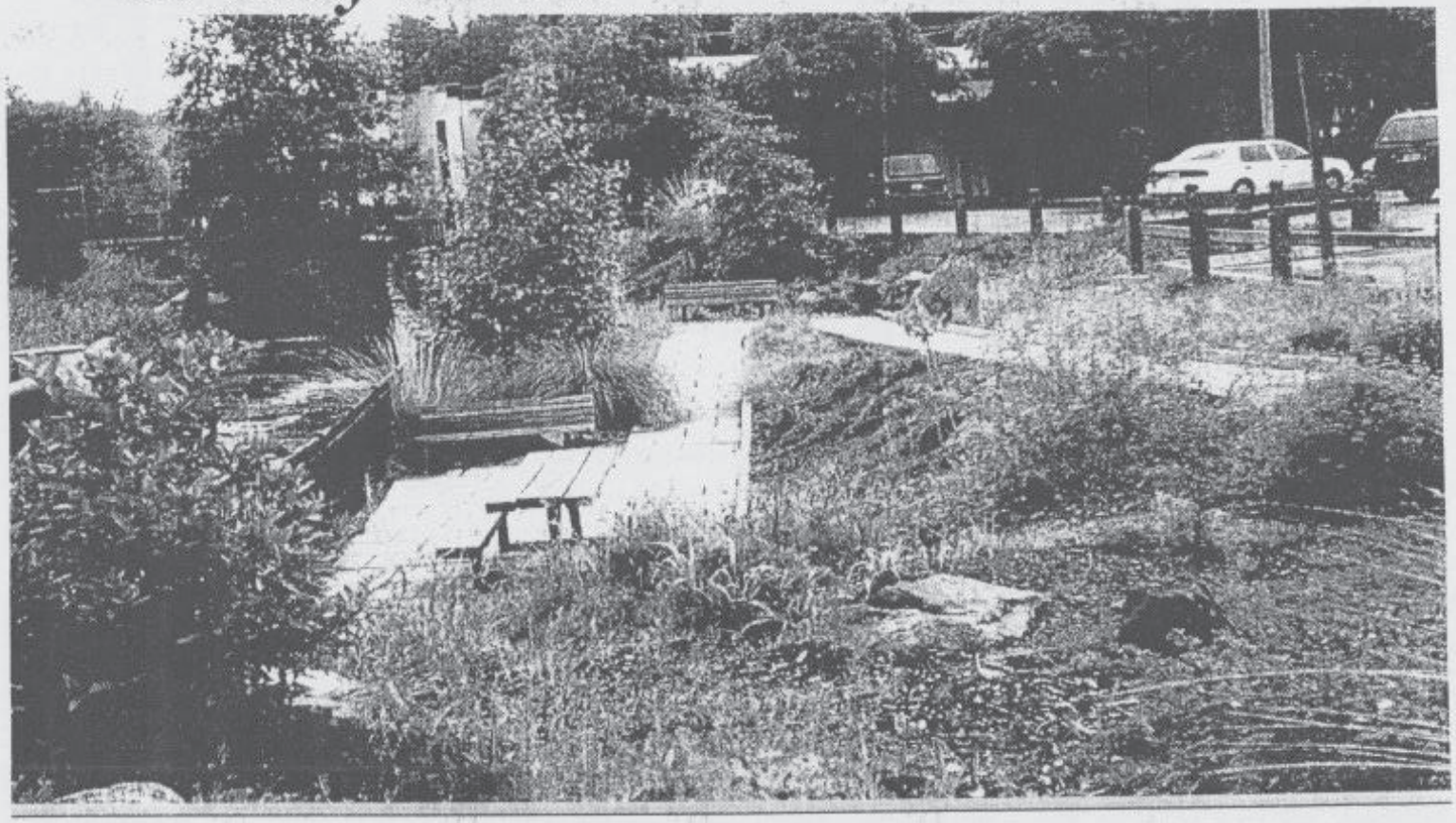
Ms. McConnell, thank you very much for your attention to this matter. I appreciate the time and energy involved in putting together such a massive document. As an active member of this community, thank you for your group's responses to my concerns. I am hopeful this project can move forward and demonstrate that our small, rural community can strike a balance between urban, economic, and environmental needs. LR6-63

Sincerely,

Debra L. Power
Community Pride
Hangtown Creek Stewardship Committee


Legend
A. REGRADE EXISTING RAILROAD BED TO SLOPE AWAY FROM CREEK BANK TO EXISTING DRAIN INLETS.
B. EXISTING GULLIES AND EROSION DAMAGED AREAS TO BE REPAIRED.
C. CREEK BANK REVEGETATION WITH NATIVE GRASSES AND RIPARIAN PLANTS FOR EROSION CONTROL.
D. EXISTING SEWER LINE.
E. LARGE BOULDERS FOR BANK ARMORING AND ENERGY DISSIPATION.
F. BOULDERS SIZED FOR 100 YEAR PEAK FLOW POTENTIAL, TYPICAL.
G. REVEGETATION FOR SLOPE STABILIZATION.
H. EXISTING ROUGH GRADED RAMP PER AMERICAN DISABILITIES ACT STANDARDS. FINISH SURFACE WILL BE 4' CONCRETE WALKWAY.
I. EXISTING CULVERT.
J. REINFORCE HEADWALL AT EXISTING CORRUGATED METAL PIPE DRAIN INLET
K. LARGE BOULDERS FOR ENERGY DISSIPATION.
North
10' 20'
Clay Street
Hangtown Creek
Parking Lot
South Bank Public Access Area
Hangtown Creek
Revegetated Slope For Erosion Control
Future El Dorado Trail Extension
ection
Hangtown Creek
Restoration Project - Phase 1 & 2

Ivy House Parking Lot at Clay Street



MAYFIELD LANDSCAPE DEVELOPMENT

"THE DESIGN FIRM"

Landscape Architect #3938 • Landscape Contractor #551736

1851 GOLDMAN LANE PLACERVILLE, CA 95667

(916) 626-0671

IVY HOUSE CREEKSIDE LANDSCAPE PROJECT

A. Review goals

1. Enhance the environmental and aesthetic qualities of the creek
2. Emphasis on riparian species
3. Rock armoring at toe of north bank
4. Tree canopy at maturity
5. Erosion control on the north bank

B. Design Concepts

1. South Bank

- Trees for shade and fall color
- Colorful shrubs that are low maintenance, able to withstand high pedestrian traffic and potential abuse, non-toxic or poisonous
- Ground cover for erosion control, color, and traffic control

2. North Bank

- Tall evergreen conifers to screen Highway 50 visually and acoustically
- Medium native deciduous trees to provide a canopy over creek and fall color
- Shrubs to screen sewer line, reduce highway noise, provide wildlife habitat, and attract beneficial insects
- Ground cover for erosion control and color
- Native grasses for erosion control
- Aquatic plants for creek stabilization

3. Plant species (see attached list)

C. Concerns of last meeting

1. plant species
2. canopy jungle vs. openness
3. health of creek for future
4. fish habitat, wildlife habitat

erosion control

look at it as a healthy env.

native
birds
insects
fish
butterflies

D. Site Analysis

What is there now?

trees
buildings
pipes
railroad bed drainage
bridge drainage
sewer line

nice rock outcroppings
alder in the wall
sedges } down farther
pools }
~~sedges, tomtit~~
buildings
CalTrans manhole

E. Design solution

MAYFIELD LANDSCAPE DEVELOPMENT

"THE DESIGN FIRM"

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IVY HOUSE CREEKSIDE
PLANT PALLET

TREES

Deciduous

Big-leaf Maple	Acer macrophyllum	W	1,2
Califronia Buckeye	Aesculus californica	B	1
White Alder	Alnus rhombifolia	W	1,2
Pacific Dogwood	Cornus nuttalli 50 x 20		3
male Fremont Cottonwood	Populus fremontii 'Nimbus'		1,3
Red Willow	Salix laevigata	W,B,I	3
Yellow Tree Willow	Salix lasiandra	W,B,I	3

Conifers

Incense Cedar	Calocedrus decurrens	W	1
Ponderosa Pine	Pinus ponderosa		1

Shrubs

evergreen

Manzanita	Archtostaphylus sp.	W	1
Dwarf Coyote brush	Baccharis pilularis 'Twin Peaks'	W,I	1
Ceanothus 'Carmel Creeper'	Ceanothus griseus var. horizontalis	W,B,I	1
Ceanothus 'Yankee Point'	Ceanothus griseus var. horizontalis 'Yankee Point'	W,B,I	1
Rockrose	Cistus sp.		1
Toyon	Heteromeles arbutifolia	W	1,2
Coffeeberry	Rhamnus californica 'Eve Case'	W,B,I	1,2
Fuschia Flowered Gooseberry	Ribes speciosum	W	1,2,3

(shrubs cont.)

deciduous

Spice Bush	Calycanthus occidentalis		1,2,3
American Dogwood	Cornus stolonifera		2,3.
Lupine	Lupinus albifrons		1,2,3
Mock Orange	Philadelphus lewisii 'Gooose Creek'		1,2,3
Western Azalea	Rhododendron occidentalis		1,2,3
California Wild Rose	Rosa californica	W	2,3
Blue Elderberry	Sambucus cerulea	W	2,3
Spiraea	Spiraea douglasii		1,2
Snowberry	Symphoricarpus rivularis		1,2,

VINES

Dutchman's pipe	Aristolochia californica	W,B	1,2
Clematis	Clematis ligusticifolia		1,2
Honeysuckle	Lonicera hispidula var. vacillans		1,2
Wild Grape	Vitis californica	W	1,2

PERENNIALS

Achellia sp.	Achellia	W,B,I	1,2
Columbine	Aquegia formosa var. truncata		3
Indian Hemp	Apocynum cannibinum var. glaberrimum		3
Indian Rhubarb	Darmera peltata		3
Bleeding Heart	Dicentra formosa		3
Fairy bells	Disporum smithii		3
Alum-root	Heuchera micrantha var. pacifica		3
Lupine	Lupinus latifolius		3
False Lily-of-the-Valley	Maianthemum dilatatum		3
Scarlet Monkey Flower	Mimulus cardinalis		3
Monkey Flower	Mimulus guttatus		3
False Solomons seal	Smilacina stellata var. sessilifolia		3
California Fuschia	Zauschneria california		1,2

AQUATIC

Barbara Sedge	Carex barbarae		4
Common Spikerush	Eleocharis macrostachya		4
Baltic Rush	Juncus balticus		4
Bulrush	Scirpus microcarpus		4

FERNS

Wood Fern	Dryopteris erythrosora		3
Giant Chain Fern	Woodwardia fimbriata		3

NATIVE GRASSES

Idaho Fescue	Festuca idahoensis	W,I	1-4
Deer grass	Muhlenbergia rigens	W,I	1-4

SYMBOLS

* W=wildlife, B=butterfly, I=benefical insects

1- Top of Bank 2 - Mid Bank 3- Lower Bank 4 - Channel Bottom

REQUEST FOR COUNCIL ACTION

DISCUSSION:

A presentation will be made to the council regarding some possible alternatives towards the repair of the wall along Hangtown Creek. In addition, we will share some ideas in relationship to the realignment of Clay Street and how that interacts with the Ivy House Parking Lot.

We have been working closely with our Soil Conservation Office, the Resource Conservation District, the Hangtown Creek Restoration Committee, and HDR, our contract engineers, towards alternatives and potential funding sources for the restoration of the collapsed wall along Hangtown Creek. We are excited about the possibility of this becoming part of a restoration project in cooperation with the Hangtown Creek Restoration Committee, and would like to share these ideas with you.

ALTERNATIVES:

To be presented at the meeting.

FISCAL IMPACT:

To be determined.

RECOMMENDATION:

It would be our recommendation that the City Council approve the Redwood Log Cribwall restoration approach, (which will be presented to the council at the meeting), if funding can be made available which would not affect the General Fund. The council may also wish to direct staff to come back with further design considerations, costs and funding of realigning Clay Street to tie in with Cedar Ravine.

COUNCIL DATE: 2/8/94	TITLE: Repair of Hangtown Creek Wall	TYPE OF ACTION: ORDINANCE ____ RESOLUTION ____ FORMAL ACTION _X__ OTHER _____
DATE SUBMIT: 2/2/94	SUBMITTED BY: Ron Mueller DEPARTMENT: Recreation & Parks	
AGENDA NUMBER: 12	ADMINISTRATIVE REVIEW: Robert M. Semple	CONCURRENCE:

7.3.4.12 Response to Comment Letter LR6 Debra Power

LR6-1: Introductory sentences indicating the commenter is providing comments on the REIR and thanks the City for their attention to their concerns. The City appreciates this comment. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-2: The commenter references that the REIR does not include objectives that prioritize protection of the natural environment alongside and within Hangtown Creek. The commenter questions why mitigating and minimizing environmental impacts of natural waterways and wildlife habitat are not included as project objectives. The commenter also inquires as to why the creekside viewing area is not considered an adjacent property per the project objective.

The City acknowledges the commenter's interest in protecting Hangtown Creek and the natural environment; however, the absence of a separate environmental-protection objective does not indicate that these resources were excluded from consideration in the development or environmental review of the proposed project.

CEQA Guidelines Section 15124(b) requires the project description to include "[a] statement of the objectives sought by the proposed project." The Guidelines further explain that "[a] clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary." Thus, the purpose of the project objectives is to identify what the proposed project is intended to accomplish and to provide a basis for evaluating alternatives; Section 15124(b) does not require the objectives to identify each environmental resource that could be affected by the project.

Protection of Hangtown Creek and the surrounding natural environment is instead addressed through the environmental review required by CEQA. CEQA Guidelines Section 15126.2(a) requires an EIR to "identify and focus on the significant effects of the proposed project on the environment" and to discuss both direct and reasonably foreseeable indirect environmental effects. Similarly, CEQA Guidelines Section 15126.4(a)(1) provides that an EIR "describe feasible measures which could minimize significant adverse impacts." Accordingly, environmental protection is not dependent upon whether protection of a particular resource is expressly identified as a project objective.

Consistent with these requirements, the REIR evaluates potential effects on Hangtown Creek, Cedar Ravine, riparian vegetation, aquatic habitat, water quality, drainage, and other natural resources, particularly in Section 4.3 Biological Resources, and Section 4.7 Hydrology and Water Quality. The REIR incorporates Mitigation Measures BIO-3 (previously BIO-5 and BIO-6) to avoid, minimize, and compensate for impacts to biological resources and water quality. The REIR requires revegetation of temporarily disturbed areas with native vegetation and identifies mitigation and regulatory permitting requirements applicable to impacts to aquatic and riparian resources including a CDFW

Streambed Alteration Agreement (Fish & G. Code Section 1602), Clean Water Act Sections 401 and 404 authorizations, and other state and federal biological resource protections (Section 3.5, Table 3.5-1).

Accordingly, CEQA distinguishes between the objectives that describe what a project is intended to accomplish and the environmental analysis that identifies impacts and provides measures that avoid, minimize, or mitigate the environmental consequences of accomplishing those objectives. Adding a separate objective requiring protection or enhancement of Hangtown Creek or the natural environment is not necessary for the REIR to comply with CEQA. The REIR evaluates the proposed project's effects on these resources and identifies mitigation measures to avoid, minimize, restore, or compensate for significant effects where required.

Specific to the project objective regarding adjacent properties, the creekside viewing area is considered within the proposed project boundary, and not adjacent to the proposed project. Refer to Chapter 3 Project Description, specifically Section 3.4.3 Ivy House Parking Lot, of the REIR for details regarding the relocation of the creekside viewing area.

Please refer to Global Response 7. No revision to the project objectives or environmental analysis of the REIR is necessary in response to this comment.

LR6-3: The commenter expresses concern that the proposed bridge widening would increase the amount of Hangtown Creek covered by the structure and questions whether on-site mitigation, including creek daylighting, should be required. The commenter also seeks assurance that any mitigation for increased creek coverage would occur within the project area rather than through the purchase of off-site mitigation credits. Additionally, the commenter questions whether the proposed bridge width, including sidewalks on both sides and bicycle accommodations, is necessary and suggests that a narrower design could reduce impacts to Hangtown Creek.

The commenter is referred to Global Response 1 for additional discussion of the proposed bridge configuration and the relationship of the bridge design to the objectives identified in Section 3.3 Project Objectives of the REIR.

The proposed width reflects the functions that the replacement bridge is intended to provide. As identified in Section 3.3 Project Objectives of the REIR, project Objective C is to improve pedestrian and bicyclist access and safety within the project area. Providing sidewalks on both sides of Clay Street creates continuous pedestrian connections across Hangtown Creek and to the El Dorado Trail and neighborhoods north of the bridge. The transportation analysis further concluded that sidewalks and Class III bicycle facilities on both sides of Clay Street would provide a more complete and connected pedestrian and bicycle system and improve access and safety through the project area. Accordingly, eliminating a sidewalk solely to reduce bridge width would conflict with the pedestrian-access and safety improvements incorporated into the proposed project.

The REIR also specifically evaluates the physical effects of construction of the replacement bridge on Hangtown Creek and its associated aquatic and riparian

resources. Section 4.3 Biological Resources of the REIR identifies temporary and permanent impacts associated with bridge removal, construction of the replacement bridge and abutments, stream diversion, rock slope protection, and disturbance of riparian vegetation. Temporary disturbance areas within the project footprint would be revegetated with native vegetation pursuant to the applicable biological mitigation and permitting requirements.

The commenter's recommendation to daylight another portion of Hangtown Creek is noted. Creek daylighting can be an appropriate form of compensatory mitigation where it would replace or restore aquatic, riparian, or hydrologic functions lost as a result of a project. However, CEQA and applicable resource agency permitting requirements do not require a one-for-one daylighting of creek area based solely on the surface area covered by a bridge. The appropriate mitigation is determined by the nature and extent of the environmental impact, including permanent fill, loss of riparian habitat, disturbance of aquatic resources, and effects on stream function. The REIR identifies and quantifies those impacts and establishes Mitigation Measures BIO-3 (formerly Mitigation Measure BIO-5 in the REIR) and applicable regulatory permitting requirements to compensate for them. The REIR does not identify daylighting of another portion of Hangtown Creek as necessary to reduce a significant project impact.

The City acknowledges the commenter's preference that mitigation occur entirely within the project area. Please refer to response to Response LR1-6 regarding location of mitigation. These regulatory agencies may establish avoidance, minimization, restoration, monitoring, and compensatory mitigation requirements as conditions of their respective permits and authorizations that are beyond what is stated in REIR Mitigation Measures. The location, amount, type, and method of compensatory mitigation therefore cannot necessarily be limited to the immediate project site. Where temporary disturbance occurs, the REIR specifically requires revegetation within the project footprint. Other compensatory mitigation is governed by the applicable mitigation measures and regulatory permits and may occur onsite, within the watershed, or through an approved mitigation mechanism, depending upon the affected resource and agency requirements. The City cannot commit to onsite mitigation where doing so would be infeasible or would not satisfy the applicable resource agency requirements.

The City also recognizes the importance of minimizing unnecessary effects on Hangtown Creek. However, the bridge width represents a balance among minimizing the project footprint and providing the two-way roadway, pedestrian facilities, bicycle accommodation, accessibility, bridge barriers, and other safety features necessary to accomplish the project objectives and applicable design requirements. Further narrowing of the bridge cannot be undertaken if it would compromise those functions or applicable engineering and safety standards. Please refer to Global Response 1 and Global Response 2.

Accordingly, the increased bridge width and associated effects on Hangtown Creek have been disclosed and evaluated in the REIR. The REIR identifies mitigation for significant effects to aquatic and riparian resources, while the proposed bridge cross-section provides the transportation, pedestrian, bicycle, accessibility, and safety

improvements that are integral to the proposed project. The commenter's preference for a narrower bridge, a single sidewalk, and onsite daylighting is noted; however, the comment does not identify new information requiring revision of the REIR. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-4: The commenter notes that the project's proposed reconfiguration of the Ivy House parking lot appears inconsistent with City policies that encourage landscaping, street beautification, and enhanced treatment of prominent intersections and public spaces. The commenter believes the project includes limited beautification beyond preservation of the existing cork oak tree and planter area. The commenter suggests incorporating additional landscaping elements, such as planter boxes and shade trees within the parking lot, to better align with City policies and improve community acceptance of the project.

The City notes the commenter's concern regarding landscaping and beautification. As discussed in Global Response 7, the proposed project includes streetscape and landscape treatments, including low planter walls, street trees, and accent landscaping associated with the reconfigured Ivy House parking lot pursuant to Mitigation Measure AES-1. The final type, quantity, precise number, species, and placement of landscaping, including trees, will be determined during the PS&E phase (refer to Global Response 6). No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-5: The commenter expresses concern that relocating the existing creekside viewing area to the north side of Hangtown Creek would increase visual impacts along the El Dorado Trail and detract from views of the riparian corridor. The commenter also questions the height of the proposed retaining wall and expresses concern that it could become a visually dominant feature if the roadway and parking lot are raised.

The commenter is referred to Global Response 4, for a comprehensive discussion of the existing visual character of the project area, anticipated visual changes associated with the proposed project, and the landscaping and architectural treatments to be incorporated into the proposed project. In addition, the commenter is referred to Responses LR1-3 and LR1-4 regarding aesthetic impacts.

Chapter 3 Project Description of the REIR, describes that the project proposes to relocate the existing creekside viewing area from the southeast side of the bridge to the northeast side of Hangtown Creek to maintain public access to creek views following construction of the bridge replacement and roadway realignment (REIR Section 3.4 Proposed Project). As evaluated in Section 4.1 Aesthetics of the REIR, implementation of the proposed project would alter the visual character of this portion of Hangtown Creek and mitigation measures are identified to minimize visual impacts associated with new project features (REIR Section 4.1, Mitigation Measures AES-1 and AES-2). The retaining walls required to support the roadway, bridge, and parking lot improvements are currently at a preliminary design level (it should be noted that although at the preliminary design level, the roadway and parking lot vertical profile will be slightly

elevated compared to existing conditions). As described in the Type Selection Report, retaining wall heights could be as much as 20 feet in certain locations; however, final wall heights have not yet been determined and will be refined during the PS&E phase of the proposed project. The Type Selection Report also notes that opportunities to reduce wall heights through grading refinements and consideration of site conditions will be evaluated during final design. Additionally, aesthetic treatments for retaining walls, bridge abutments, and related structures are planned as part of the project design to maintain compatibility with the character of the surrounding area and will be finalized during project PS&E. Landscaping and streetscape improvements identified in the REIR and identified in the mitigation measures will also be incorporated during final design (PS&E) to further reduce visual impacts. Please refer to Global Response 6 regarding final design and landscaping details. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-6: The commenter states that the REIR does not adequately disclose the visual impacts associated with the proposed retaining walls and believes the identified mitigation measures do not compensate for the loss of setbacks and open views that the community has sought to preserve. The commenter also objects to the use of off-site mitigation and requests that visual impacts be addressed within the project area.

Please refer to Global Response 4 for a comprehensive discussion of the proposed project's visual effects and the architectural and landscape treatments associated with the retaining walls; Response LR6-5 regarding retaining wall height, design, and visual treatment; Responses LR1-3 regarding setbacks along Hangtown Creek, and LR1-4 regarding preservation of the creek corridor and views.

As discussed in those responses, the REIR evaluates the visual changes associated with the proposed project and does not rely on off-site mitigation to address aesthetic impacts. Visual mitigation would be incorporated onsite through project design, landscaping, streetscaping, and architectural treatment of the retaining walls and other structural features. Off-site or mitigation-bank measures discussed elsewhere in the REIR relate to biological or aquatic resource impacts and are not relied upon to mitigate aesthetic impacts. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-7: The commenter expresses that the preservation of the creekside viewing area is important to the community and is the only viewing area with ADA access.

The City acknowledges the importance of maintaining accessible public viewing opportunities along Hangtown Creek. As discussed in Section 3.4.3 Ivy House Parking Lot of the REIR, the existing creekside viewing area and access path would be removed to accommodate the proposed bridge replacement, Clay Street realignment, and associated improvements. However, the creekside viewing function and ADA accessibility would be maintained through construction of the relocated creekside viewing area on the northeast bank of Hangtown Creek adjacent to the El Dorado Trail.

As further discussed in Responses LR1-2 and LR5-5, the relocated viewing area would be developed as a flat area at approximately the same grade as the El Dorado Trail,

with ADA-compliant access provided through the El Dorado Trail/Clay Street connection. The relocated viewing area would be a publicly accessible location from which visitors can continue to view and enjoy Hangtown Creek. The final design and amenities of the creekside viewing area will be refined during the PS&E phase (refer to Global Response 6 regarding final design).

Accordingly, although the existing creekside viewing area would not remain in its current location, the proposed project would maintain its creek-viewing function and provide ADA-accessible public access at the relocated creekside viewing area. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-8: The commenter states that the proposed reconfiguration of the Ivy House parking lot does not provide sufficient space for shade trees and other landscaping features that would improve aesthetics and reduce summer heat. The commenter believes that providing additional trees would be more beneficial to the community, even if it results in a further reduction in parking spaces. The commenter also suggests that any parking loss could be offset by other City parking resources and that local volunteer groups could assist with maintaining landscaping, beautification features, and planter boxes.

The City acknowledges the commenter's recommendations. As discussed in Global Response 4 and in Responses LR1-5 and LR6-4, landscaping and streetscape improvements are components of the proposed project and are part of the project's strategy for reducing visual impacts and maintaining compatibility with the surrounding setting. Mitigation Measure AES-1 specifically provides streetscape landscaping, including street trees and accent landscaping associated with the reconfigured Ivy House parking lot. As discussed in Global Response 6, the final tree species and detailed landscape design will be determined during the PS&E phase consistent with applicable City landscaping and streetscape design guidance.

The REIR separately addresses replacement of trees removed by the proposed project. As discussed in Section 4.3 Biological Resources of the REIR, tree removal and impacts to riparian vegetation are subject to the applicable biological resource mitigation measures. These requirements are separate from the streetscape and shade-tree landscaping provided pursuant to Mitigation Measure AES-1. Thus, required biological mitigation planting should not be confused with the additional ornamental and streetscape landscaping that may be incorporated into the reconfigured parking lot.

The commenter's preference for additional shade trees within the Ivy House parking lot is consistent with the type of landscaping contemplated by the proposed project. However, the precise number, species, and placement of trees have not yet been determined. These details will be developed during PS&E in consideration of available planting area and other project requirements and constraints (refer to Global Response 6).

Accordingly, the proposed project already provides tree planting and landscaping within the reconfigured Ivy House parking lot, while the detailed planting plan will be developed during PS&E. The commenter's recommendation to maximize shade-tree

planting within the available landscape areas is noted and may be considered as the final landscape plans are developed. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-9: The commenter summarizes how the existing creekside viewing area came to be developed through the Department of Water Resources (DWR) grant the City obtained and expresses that their group Community Pride would resume maintenance if the facility was preserved.

The City acknowledges this comment. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-10: The commenter asserts that the proposed retaining walls would further constrain Hangtown Creek, increase flooding potential, and may be vulnerable to damage from larger flood events associated with climate change. The commenter also questions whether designing the bridge and retaining walls for 100-year flood conditions is sufficient and whether the cumulative presence of retaining walls along the creek could worsen flooding.

Section 4.7 Hydrology and Water Quality of the REIR analysis concluded that the proposed project would not increase flood risk because the replacement bridge would provide a larger hydraulic opening and improved conveyance compared to existing conditions. The Type Selection Report (Section 3, Hydrology and Hydraulic Performance) demonstrates that the proposed bridge lowers upstream water surface elevations during both the 50-year and 100-year storm events and passes the 100-year event without pressure flow. The proposed retaining walls (Section 4.0 Type Selection Report) are necessary to support the roadway, bridge approaches, and Ivy House parking lot improvements and will be founded on scour-resistant bedrock identified in the geotechnical investigations. The Type Selection Report further indicates that foundation design will account for scour conditions associated with both the 100-year and 200-year flood events in accordance with current Caltrans and AASHTO requirements. The final retaining wall design, including durability and structural service life considerations, will be completed during the PS&E phase in accordance with applicable engineering standards. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-11: The commenter asserts that the proposed project would reduce the existing setback from Hangtown Creek by extending pavement and retaining walls closer to the creek, which they believe conflicts with longstanding community efforts to preserve riparian buffers. The commenter argues that the existing creek viewing area provides an important setback that helps protect the creek from runoff and erosion impacts and should be maintained or expanded rather than reduced. The commenter further contends that reducing the setback is inconsistent with the Hangtown Creek Master Plan and the City of Placerville General Plan policies that support protection of the riparian corridor.

Please refer to Response LR1-3 regarding setbacks along Hangtown Creek. Table 4.8-1 of the REIR identifies Section VIII. Policy A.4 of the General Plan, which refers to

protection of riparian habitat, rather than setting a specific setback regulatory requirement from a creek. The analysis in the REIR found that the proposed project is consistent with this policy because the proposed project would not develop new features that require setbacks from Hangtown Creek and disturbed riparian habitat would be revegetated. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-12: The commenter inquires about the plans for the relocated viewing area and is concerned with ADA access, proper setbacks, design features, and proper water conveyance during flood events.

The City acknowledges the commenter's concerns. As discussed in Section 3.4.3 Ivy House Parking Lot of the REIR and Responses LR1-2, LR5-5, and LR6-7, the existing creekside viewing area would be removed and relocated on the northeast bank of Hangtown Creek adjacent to the El Dorado Trail. The relocated creekside viewing area would consist of a generally flat area at approximately the same grade as the El Dorado Trail, with ADA-compliant access provided through the El Dorado Trail/Clay Street connection. The viewing area would continue to provide a publicly accessible location from which visitors can view and enjoy Hangtown Creek and would maintain the recreational and creek-viewing function of the existing facility.

The current engineering plans identify an approximately 70-foot-long by 5-foot-wide area for the relocated creekside viewing area. The precise configuration, landscaping, materials, and other aesthetic amenities will be refined during the PS&E phase.

With respect to setbacks from Hangtown Creek, please refer to Response LR1-3. As discussed therein, the 15-foot setback identified in the Hangtown Creek Master Plan is a recommended policy and implementation measure and was not subsequently adopted by the City as a mandatory regulatory setback. The final configuration of the viewing area will nevertheless be developed in consideration of the physical constraints of the creek corridor and applicable engineering, accessibility, environmental, and safety requirements.

With respect to the commenter's concern regarding flooding and water conveyance, please refer to Response LR6-10 and Section 4.7 Hydrology and Water Quality of the REIR. The relocated creekside viewing area would be located along the Hangtown Creek corridor, and its final design will be coordinated with the project's hydraulic design so that the improvement does not interfere with the required conveyance of flood flows. The detailed design of the viewing area will therefore account for applicable hydraulic conditions as the project advances through PS&E.

Accordingly, the location and general function of the relocated creekside viewing area, including ADA-compliant access, have been established as components of the proposed project. PS&E will refine the detailed design and amenities rather than determine whether ADA access will be provided. As identified previously, Responses LR1-2, LR1-3, LR5-5, and LR6-7 provide detailed information regarding setbacks and flood conveyance. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-13: The commenter references Section 3.4.5 Landscaping and Lighting of the REIR and expresses that the project renderings indicate much more attention to lighting than landscaping. The commenter also opines that insufficient existing lighting at the Creekside viewing area contributed to its safety degradation.

As discussed in Responses LR6-4 and LR6-8, and Global Response 4, landscaping and streetscape improvements are components of the proposed project. Mitigation Measure AES-1 includes street trees, accent landscaping, and other streetscape treatments intended to reduce visual impacts and maintain compatibility with the surrounding setting. The final type, quantity, and placement of landscaping will be developed during the PS&E phase in accordance with applicable City landscaping and design guidance.

The commenter's observation regarding lighting and safety at the existing creekside viewing area is noted. Appropriate design for the relocated creekside viewing area will be considered during final design together with pedestrian safety, accessibility, landscaping, maintenance, visual compatibility, and avoidance of unnecessary light and glare.

Accordingly, and as discussed in Global Response 4, the REIR expressly identifies the renderings as conceptual and for illustrative purposes only; the conceptual renderings do not indicate that landscaping has been given less consideration than lighting. Both landscaping and lighting are components of the proposed project, and their detailed design and integration will be refined during PS&E (see Global Response 6). No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-14: The commenter expresses concern regarding the anticipated removal of approximately 20 trees during project construction and references General Plan policies regarding protection and management of the City's tree cover. The commenter requests that the City reevaluate the necessity of removing mature trees, suggests that preservation or modification of the existing creekside viewing area could allow additional trees to remain, and recommends replacement of mature trees at a minimum 3:1 ratio.

The City acknowledges the commenter's concerns regarding preservation of mature trees. Please refer to Global Response 6 for a discussion of landscaping, tree planting, and the level of landscape design that will be developed during the PS&E phase. Please also refer to Global Response 3 regarding the project footprint and the reasons the proposed roadway and bridge configuration are necessary.

As discussed in Sections 4.1 Aesthetics and 4.3 Biological Resources of the REIR, the approximately 20 trees anticipated for removal are not located solely within the existing creekside viewing area but at various locations throughout the project footprint. Therefore, retaining the existing viewing area would not avoid all tree removal associated with construction of the replacement bridge, Clay Street realignment, retaining walls, Ivy House parking lot improvements, and other project features. The REIR also requires preservation of existing vegetation where feasible. Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR) requires an

International Society of Arboricultural (ISA)-certified arborist to complete a tree survey prior to removal and requires retention, to the extent feasible, of riparian vegetation, oaks, and other native tree species.

With respect to replacement ratios, the REIR identifies a minimum 1:1 replacement ratio for trees removed within the project area, or a higher ratio where required by applicable natural-resource permits. This minimum tree-replacement requirement should be distinguished from mitigation for permanent loss of riparian and montane hardwood-conifer habitat. Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR) requires compensation for permanent impacts to these habitat types at a minimum 3:1 ratio. Thus, where removal of trees constitutes permanent loss of habitat subject to Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR), the higher habitat-compensation requirements would apply.

As discussed in Global Response 6, the final landscape plans, including the precise number, species, size, and location of replacement and streetscape trees, will be developed during PS&E. Final design will also provide an additional opportunity to identify trees that can feasibly be retained while accommodating the project improvements and applicable engineering, safety, accessibility, hydraulic, and environmental requirements.

The commenter's preference for retaining additional mature trees and providing additional onsite tree planting is noted and may be considered as the landscape design is refined during PS&E. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-15: The commenter asks what the impacts are to trout that are spawning during January through June.

Per Chapter 3 Project Description and Section 4.3 Discussion c, flows in the subject reach of Hangtown Creek would be diverted prior to any work in the channel, thereby avoiding direct impacts to aquatic species, including spawning trout. Additionally, the stream diversion would likely occur late April through October, which is during the portion of the year when flows are the lowest and water temperatures are highest, making it unlikely that trout would be spawning in the subject reach of Hangtown Creek during this period. As a result, the proposed project is not likely to impact trout spawning activities in Hangtown Creek. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-16: The commenter disagrees with the REIR's characterization of the existing visual quality of Hangtown Creek and emphasizes the creek's value as a natural, aesthetic, and community resource. The commenter further states that the presence of existing retaining walls, utilities, and other urban infrastructure along the creek should not be interpreted as justification for additional visual degradation and encourages the City to continue efforts to improve the natural character of the creek corridor.

The City acknowledges the commenter's perspective regarding the visual and community value of Hangtown Creek. Please refer to Global Response 4 for a comprehensive discussion of the existing visual setting, the anticipated visual changes

associated with the proposed project, and the measures incorporated into the project to reduce visual impacts. Please also refer to Global Response 6 regarding the landscaping, revegetation, and other aesthetic treatments that will be further developed during PS&E.

The REIR does not rely on the existing urbanized condition of Hangtown Creek as justification for additional degradation of the creek corridor. Rather, the description of existing retaining walls, utilities, roadway infrastructure, parking areas, and other developed features establishes the environmental baseline against which the proposed project's effects are evaluated. Section 4.1 Aesthetics recognizes Hangtown Creek and its riparian vegetation as components of the visual character of the project area and evaluates the anticipated changes to that setting resulting from the proposed project. The commenter is referred to Global Response 4 regarding additional information on visual quality.

Although creek restoration is not a project objective, the proposed project must avoid, minimize, and mitigate its effects on Hangtown Creek and associated riparian resources in accordance with the REIR, applicable mitigation measures, and permits and approvals issued by the applicable resource agencies. Protection of the creek corridor is also addressed outside of the aesthetics analysis. Section 4.3 Biological Resources of the REIR, evaluates effects on riparian vegetation and aquatic resources and requires implementation of Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR), including preservation of riparian vegetation where feasible, tree-protection measures, restoration of temporarily disturbed areas, and compensation for permanent losses of riparian habitat. Section 4.8 Land Use and Planning of the REIR, separately evaluates the proposed project for consistency with applicable General Plan policies concerning protection of Hangtown Creek, natural features, trees, riparian vegetation, and the visual character of the area. In particular, Table 4.8-1 evaluates General Plan Policies V.D.11, V.I.4, and V.I.5 concerning protection of Hangtown Creek, natural features, and preservation of creeks in as natural a state as possible. The REIR concludes that the proposed project is consistent with these policies based on the project's avoidance, minimization, revegetation, tree-protection, and landscape measures. In addition, Section 3.4.5 Landscaping and Lighting, and Mitigation Measures AES-1 through AES-3 establish landscaping, streetscape treatments, vegetation protection, and tree replacement as components of the proposed project. As discussed in Global Response 6, the detailed landscape design will be further developed during PS&E consistent with these environmental commitments and applicable City plans and policies.

The commenter's preference that the project provide an opportunity to further restore and enhance the natural appearance of Hangtown Creek is noted. However, the comment does not identify an environmental effect that was omitted from the REIR or substantial new information requiring a change to the significance conclusions. Please Refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-17: The commenter references the visual assessment methodology in Section 4.1.4.1 Methodology in Section 4.1 Aesthetics of the REIR and contends that the proposed project would severely affect Key View 1 due to the raised bridge profile, retaining walls, vegetation removal, and removal of the existing creekside viewing area. The commenter also recommends preservation of portions of the existing viewing area and existing setbacks to reduce visual effects.

The City acknowledges the commenter's concerns. Please refer to Global Response 4, for a discussion of the proposed project's visual effects and proposed architectural and aesthetic treatments; Global Response 3 regarding the proposed alignment and associated project constraints; and Global Response 6 regarding landscaping, revegetation, and aesthetic treatments to be further developed during PS&E.

As described in Section 4.1.4.1 Methodology of the REIR, visual impacts were evaluated based on existing visual quality and scenic attributes, sensitive receptors and viewer sensitivity, the magnitude of anticipated visual change, and consistency with applicable visual-resource policies. The REIR's characterization of the existing visual quality of Key View 1 as "moderately high" is not equivalent to a determination that the proposed project's visual impact would be "moderately high." Existing visual quality is evaluated based on vividness, intactness, and unity, whereas the visual impact level considers both the magnitude of visual-resource change and anticipated viewer response.

Section 4.1.5 Project Impacts of the REIR applies this methodology to the proposed project and considers changes associated with the replacement bridge, roadway improvements, retaining walls, vegetation removal, and other project features. The REIR also identifies Mitigation Measures AES-1 through AES-3 to reduce visual effects through landscaping, preservation of visual resources where feasible, tree replacement, and architectural and aesthetic treatments. The commenter's observation that replacement vegetation will require time to mature is acknowledged; however, this does not establish that the proposed project would result in a moderately high or high visual impact under the methodology established in Section 4.1.4.1 of the REIR.

The commenter's preference for retaining additional portions of the existing creekside viewing area, vegetation, and setbacks is noted. However, the comment does not provide substantial evidence demonstrating that the visual assessment methodology was improperly applied or that the significance conclusions in Section 4.1 Aesthetics should be changed. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-18: The commenter references statements in the REIR (Key View 1 and Key View 5) describing existing visual conditions along Hangtown Creek. The commenter disagrees with the REIR's characterization of existing utilities and channel modifications and contends that historic degradation of the creek corridor should not justify additional visual impacts, instead advocating for a balance between urban infrastructure and restoration of natural aesthetics.

The City acknowledges the commenter's concerns. Please refer to Global Response 4 for a discussion of the proposed project's visual effects and proposed architectural treatments and Global Response 6 regarding final retaining wall design, landscaping, and revegetation to be developed during PS&E.

As mentioned in Response LR7-17 and described in Section 4.1.4.1 Methodology of the REIR visual impacts were evaluated based on existing visual quality and scenic attributes, sensitive receptors and viewer sensitivity, the magnitude of anticipated visual change, and consistency with applicable visual-resource policies. Section 4.1.5 Project Impacts of the REIR applies this methodology to Key View 1 and Key View 5 and evaluates the anticipated changes associated with the replacement bridge, retaining walls, roadway improvements, and vegetation removal. The REIR recognizes that these improvements would result in a noticeable change to the existing visual environment.

The visual simulations presented in Section 4.1 Aesthetics illustrate the anticipated proposed project improvements but do not represent final architectural or landscape plans. As discussed in Global Response 4, the REIR expressly identifies the renderings as conceptual and for illustrative purposes only Global Responses 4 and 6 explain that final retaining wall heights and treatments, grading, landscaping, and other aesthetic details will be refined during PS&E. Mitigation Measures AES-1 through AES-3 require landscaping and streetscape improvements, architectural treatment of project features, preservation of visual resources where feasible, limitation of vegetation clearing, and replacement planting to reduce visual effects.

The commenter's disagreement with the REIR's visual impact conclusion does not provide substantial evidence demonstrating that the methodology was improperly applied or that the significance conclusion in Section 4.1 Aesthetics should be changed. Please refer to Global. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-19: The commenter references Threshold A under Section 4.1 Aesthetics of the REIR and contends that adding two park benches to the replacement creekside viewing area north of the creek is insufficient mitigation for the removal of the existing creekside park.

The City acknowledges the commenter's concerns. Please refer to Global Response 6 regarding final design, landscaping, and movement of the creekside viewing area to be developed during PS&E.

The comment does not identify any inadequacy in the environmental analysis and does not provide substantial evidence indicating that the significance conclusions in the REIR should be changed or that the recommended mitigation is ineffective. Specifically, Section 4.1 Aesthetics, Section 4.1.5 Project Impacts Threshold A is intended to analyze the potential for the proposed project to have a substantial adverse effect on a scenic vista. A scenic vista is defined under this discussion, and the project area does not meet the definition nor does the City officially designate the project site or area around the project site as a scenic vista. Please Refer to Global Response 7. No

revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-20: The commenter references Threshold B under Section 4.1 Aesthetics of the REIR as well as statements regarding the removal of 20 trees and replacement of them at a minimum 1:1 ratio. The commenter contends that if the creekside viewing area is protected, then the removal of 20 trees would not be necessary. The commenter also believes a replacement ratio of 3:1 is necessary for the loss of mature trees.

Please refer to Global Response 4 regarding the visual effects associated with vegetation removal; Global Response 6 regarding tree preservation, replacement planting, landscaping, and final design; and Response LR6-14 regarding the approximately 20 trees identified for removal and the applicable tree and habitat replacement ratios and requirements.

As discussed in those responses, the approximately 20 trees identified for removal are located at various locations throughout the project footprint and are not solely associated with the existing creekside viewing area. Therefore, retaining or modifying the existing creekside viewing area would not avoid all tree removal associated with the proposed project.

The commenter's preference for preservation of additional mature trees is noted and may be considered during final design consistent with the project footprint and applicable engineering, safety, environmental, and mitigation requirements. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-21: The commenter contends that the proposed project is inconsistent with General Plan policies intended to protect Hangtown Creek and riparian vegetation because the proposed improvements would reduce the existing setback from Hangtown Creek through removal of the creekside viewing area and construction of a new retaining wall. The commenter also expresses concern regarding the resulting visual effects on the riparian corridor and the adequacy of the proposed replacement creekside viewing area.

Please refer to Global Response 4 regarding visual character and project design, Global Response 6 regarding final landscaping, tree preservation, and the creekside viewing area, Response LR1-3 regarding creek setback, and Response LR6-14 regarding preservation and relocation of the existing creekside viewing area. As discussed in those responses, the proposed project would maintain public access to views of Hangtown Creek through relocation of the creekside viewing area and would incorporate landscaping and aesthetic treatments during final design. The REIR evaluates the proposed improvements to Hangtown Creek and the surrounding riparian corridor and identifies mitigation measures to reduce potentially significant aesthetic and biological resource impacts. The comment does not identify new information requiring revision of the environmental analysis or its significance conclusions. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-22: The commenter disagrees with the REIR's conclusion that the potential visual change to Key View 1 would be moderate and contends that the proposed retaining

walls would further encroach upon Hangtown Creek. The commenter suggests that the retaining wall could instead incorporate setbacks or terracing, potentially at the expense of parking spaces, to better balance flood control, aesthetics, environmental protection, and parking needs.

Please refer to Global Response 3 regarding the proposed roadway configuration and associated design constraints; Global Response 4 regarding the proposed project's visual effects and proposed architectural treatments; and Global Response 6 regarding retaining wall design, landscaping, and aesthetic treatments to be further developed during PS&E. Please also refer to Responses LR1-3, LR6-17, and LR6-21 regarding the REIR's visual evaluation methodology and the commenter's concerns regarding setbacks and the Hangtown Creek corridor.

Section 4.1.5 Project Impacts of the REIR evaluates the anticipated change to Key View 1, including the replacement bridge, retaining walls, roadway improvements, vegetation removal, and other changes to the existing visual environment. The commenter's preference for a terraced or setback retaining wall represents an alternative design approach; however, disagreement with the proposed design does not demonstrate that the REIR's visual analysis or impact conclusion is inadequate.

The commenter's recommendation regarding terracing or additional setbacks is noted and may be considered during final design to the extent feasible and consistent with applicable engineering, hydraulic, environmental, property, and project requirements. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-23: The commenter references portions of the REIR discussing tree removal and replacement of trees at a 1:1 ratio as well as how the removal of the trees will open up views of the Ivy House parking lot and Main Street/Cedar Ravine Road intersection. The commenter contends that removal of the 20 trees is not an improvement and that protecting the creekside view area would not require removal of the trees.

Please refer to Global Response 4 regarding the proposed project's visual effects and proposed architectural treatments; and Global Response 6 regarding retaining wall design, landscaping, and aesthetic treatments to be further developed during PS&E.

Please refer to Responses LR6-14 and LR6-20 regarding tree removal, preservation, and replacement requirements. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-24: The commenter asks if installation of just one sidewalk can reduce project coverage of Hangtown Creek and also requests information on where daylighting will occur as mitigation for the additional coverage of Hangtown Creek with project implementation. The commenter also opines that offsite mitigation or use of mitigation bank credits is unacceptable.

Please also refer to Global Response 1 regarding the proposed bridge configuration and project objectives. Please refer to Response LR5-4 regarding the applicability of the Hangtown Creek Master Plan. Specific mitigation is not warranted for this proposed

project. Please refer to Response LR6-3 regarding daylighting on Hangtown Creek. Please refer to Response LR1-6 which explains why offsite mitigation or mitigation bank credits is a legitimate mitigation for the loss of riparian habitat.

As described in Section 3.4.1 Clay Street Hangtown Creek Bridge of the REIR and Global Response 1, sidewalks are proposed on both sides of the replacement bridge to provide pedestrian connections between the El Dorado Trail and neighborhoods north of Clay Street. Providing pedestrian and bicycle facilities is also consistent with the project objectives identified in Section 3.3 Project Objectives. Accordingly, eliminating one sidewalk solely to reduce the width of the bridge would not provide the pedestrian connectivity contemplated by the proposed project. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-25: The commenter references discussion on the 20-tree removal under Key View 4 on page 81 and 82 of the REIR. The commenter contends that removing all 20 trees along Hangtown Creek is not necessary and would impact viewscapes and also contends that a 3:1 tree replacement ratio is required.

Please refer to Responses LR6-14 and LR6-20. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-26: The commenter references discussion on the 20-tree removal under Key View 5 on page 85 of the REIR and contends that removal of the 20 trees from the north slope of the riparian corridor from the bridge to the Ivy House parking lot is more than a moderate impact. The commenter also references Figure 4.1-6 of the REIR and contends that the figure shows a complete decimation of the natural environment on the south bank of Hangtown Creek.

Please refer to Global Response 4 regarding the project's visual effects and proposed architectural treatments; and Global Response 6 regarding retaining wall design, landscaping, and aesthetic treatments to be further developed during PS&E.

Please refer to Responses LR6-14 and LR6-20 regarding tree removal, preservation and replacement. Please refer to Responses LR6-17 and LR6-18 regarding the visual evaluation methodology used in Section 4.1 of the REIR.

As discussed in Global Response 4, the REIR expressly identifies the renderings as conceptual and for illustrative purposes only, including the rendering in Figure 4.1-6. Final landscaping and streetscaping plans for the proposed project will be finalized during the PS&E stage of the project and will be coordinated through the City and interested parties. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-27: The commenter identifies a spelling error on page 85, under the bullet point, second paragraph, second sentence.

The word "Hangtowm" has been revised to read "Hangtown" in the REIR. The City appreciates this comment. No other revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-28: The commenter asks if installation of one sidewalk can reduce project coverage of Hangtown Creek and also requests information on where daylighting will occur as mitigation for the additional coverage of Hangtown Creek with project implementation.

Please refer to Global Response 1 regarding the proposed bridge configuration and pedestrian improvements; Response LR5-4 regarding the applicability of creek coverage, applicability of the Hangtown Creek Master Plan, and daylighting; and Response LR6-3 regarding daylighting on Hangtown Creek. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-29: The commenter references Figure 4.1-6 and the visual impact discussion in Section 4.1 Aesthetics of the REIR and contends that the proposed project would result in significant changes to the riparian corridor, including effects on vegetation, wildlife habitat, views, and flood control. The commenter further disagrees that the proposed project would be consistent with the applicable local regulatory framework, including the General Plan and Hangtown Creek Master Plan.

Please refer to Global Response 4 regarding the project's visual effects; Global Response 6 regarding landscaping, revegetation, and the conceptual nature of the project renderings; and Responses LR6-20 and LR6-26 regarding vegetation removal and Figure 4.1-6. Please also refer to Response LR5-4 regarding the applicability of the Hangtown Creek Master Plan to the proposed project.

As explained in Global Response 4 and disclosed in Section 4.1 Aesthetics of the REIR, Figure 4.1-6 is a conceptual visualization used to evaluate anticipated changes in visual character and does not represent the final extent or exact appearance of landscaping and revegetation. The REIR separately evaluates effects on riparian vegetation and wildlife habitat in Section 4.3 Biological Resources and effects related to drainage and flooding in Section 4.7 Hydrology and Water Quality. Consistency with applicable General Plan policies and other local plans is addressed in Section 4.8 Land Use and Planning.

Accordingly, the environmental issues identified by the commenter are evaluated in the applicable resource sections of the REIR rather than solely through the visual simulation in Figure 4.1-6. The commenter's disagreement with the REIR's visual impact characterization and conclusions regarding consistency with the local regulatory framework is noted; however, the comment does not provide new information demonstrating that the analyses or significance conclusions in the REIR should be changed. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-30: The commenter requests that the recommended plant list of native vegetation in the Hangtown Creek Master Plan be included along with the Main Street Streetscape Design Development Plan and also notes that incense cedars should be excluded due to their invasive nature and that they cause allergies. The commenter also opines that trees in planters should be included in the parking lots.

The City acknowledges this comment. Please refer to Global Response 6 regarding development of the final planting and landscape plans during PS&E including the selection, species, number, size, and location of the trees and other vegetation. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-31: The commenter references Mitigation Measure AES-2 and questions why the redwood tree would pose a hazard if it is not encroached upon.

The intention of Mitigation Measure AES-2 is to require an ISA-certified arborist evaluation of the redwood tree to determine its health and if it poses a hazard. If the health of the tree is found not to pose a hazard, then protection efforts would be implemented as identified in Mitigation Measure AES-2 to protect the tree in place during project construction. The City appreciates the question for clarification purposes. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-32: The commenter references Mitigation Measure AES-3 and specifically asks if it is an oversight that the mitigation says "…be replaced at a 1:1" whereas in other places in the REIR it states "1:1 or higher ratio." The commenter also notes that the site plans and the simulations presented in the REIR show the Hangtown Creek riparian zone devoid of trees and questions if the entire length of Hangtown Creek lies in an active construction area that cannot be avoided.

Please refer to Responses LR6-14, LR6-20 and LR6-23 that discuss replacement ratios of trees. Please refer to Mitigation Measure AES-3 in the REIR where the last sentence states "Replacement of removed trees within the active construction area will be replaced at a 1:1 ratio unless the natural resource agencies with permitting authority over the project require a higher ratio." This ratio is consistently applied and referenced throughout the REIR.

As disclosed in Global Response 4 and in the REIR, the visual simulations are for illustrative purposes only and are not intended to provide simulated views of all vegetation within the Hangtown Creek corridor. Similarly, the site plan presented in the REIR is preliminary and does not identify the location of existing trees and trees that would be removed. Please refer to Global Response 6 for discussion on final landscaping and hardscaping plans for the proposed project that will be finalized at the PS&E stage of the proposed project. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-33: The commenter references portions of Section 4.3.2 Environmental Setting of the REIR which describe the existing conditions pertaining to biological resources. The commenter states that, although the project area is largely urbanized and constrained by existing rip-rap, retaining walls, and other infrastructure, the remaining riparian corridor along Hangtown Creek provides valuable habitat and natural character that should be protected. The commenter believes the project presents an opportunity to demonstrate a balanced approach to growth by prioritizing environmental stewardship,

aesthetics, and habitat protection, even if doing so reduces the maximum number of parking spaces.

The City acknowledges this comment; however, the comment does not identify any inadequacy in the environmental analysis and does not provide substantial evidence indicating that the significance conclusions in the REIR should be changed. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-34: The commenter references Placerville General Plan and Hangtown Creek Management Plan policies requiring development to protect native trees, riparian vegetation, wildlife habitat, natural features, and wildlife corridor connectivity, and to ensure that activities within the riparian corridor enhance habitat. The commenter questions whether the project adequately addresses on-site mitigation for native trees and vegetation and whether potential visual impacts are consistent with these policies. The commenter also asserts that Hangtown Creek is a perennial stream, not an intermittent stream, and notes that California Department of Fish and Wildlife (formerly California Department of Fish and Game) documentation identifying approximately 650 trout per mile qualifies it as a Class I Trout Stream.

Please refer to Mitigation Measures AES-1, AES-3, BIO-3 (formerly Mitigation Measure BIO-5 in the REIR) which requires revegetation and landscaping of the project site, replacement of trees that would be removed from the site, and replacement of riparian and montane hardwood-conifer forest habitat due to project implementation. Mitigation Measures AES-1, AES-3, BIO-3 (formerly Mitigation Measure BIO-5 in the REIR) comply with the policies of the General Plan and Hangtown Creek Management Plan in protecting or enhancing areas specific to biological resources. The City acknowledges the comment regarding trout; refer to Response LR6-15. Please also refer to Response LR1-6 regarding the use of on-site and off-site compensatory mitigation and Response LR1-7 regarding the use of the term “intermittent” as it relates to Hangtown Creek. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-35: The commenter states that Hangtown Creek is an underutilized aesthetic, biological, and natural resource that could provide economic benefits to the community if it were enhanced and incorporated as a focal feature. The commenter cites examples of communities that have embraced their waterways as assets and argues that the proposed project should prioritize restoration and appreciation of the creek rather than perpetuating historical impacts such as sewage infrastructure, rip-rap, and retaining walls.

The commentor is referred to Section 3.3 Project Objectives. The City acknowledges this comment; however, the comment does not identify any inadequacy in the environmental analysis and does not provide substantial evidence indicating that the significance conclusions in the REIR should be changed. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-36: The commenter references the REIR's description of Cedar Ravine Creek and asks what measures will be incorporated into the proposed project to prevent the new retaining walls from being undermined by flows discharging from the Cedar Ravine Culvert into Hangtown Creek.

Please refer to Section 4.7 Hydrology and Water Quality of the REIR regarding drainage, flooding, erosion, and the Cedar Ravine drainage system, and Global Response 6 regarding engineering details that will be further refined during PS&E. The precise configuration and appearance of the reconstructed Cedar Ravine Culvert outlet will be developed as the project advances through PS&E and applicable regulatory permitting.

As discussed in Section 3.4.6 Utility Relocation of the REIR, the proposed project would reconstruct the Cedar Ravine Culvert outlet in conjunction with the new retaining wall. The current design maintains the outfall in approximately its existing location, with the culvert extended through the proposed retaining wall and a new outlet structure constructed to accommodate the existing hydraulic conditions. The project does not propose to upsize the culvert or otherwise increase the drainage capacity or amount of Cedar Ravine flow discharged to Hangtown Creek. The Preliminary Hydraulic Study and Scour Analysis prepared for the proposed project was updated in 2025 and was used to update Section 4.7 Hydrology and Water Quality of the REIR (refer to Section 7.2 Revisions to the REIR). Updates to the report did not necessitate changes to the environmental analysis of the REIR.

The potential for erosion and scour around the proposed bridge and associated structures has been specifically considered in the proposed project's Preliminary Hydraulic Study and scour analysis. The study evaluates proposed hydraulic conditions, potential local abutment scour, total scour potential, and appropriate rock slope protection (RSP) and other scour countermeasures. The analysis identifies the south abutment as the primary location of potential bridge-related scour and provides design recommendations for protecting the proposed improvements. The study recommends that the retaining wall foundations consist of spread footings bearing on undisturbed rock, with the footings embedded below the top of intact scour-resistant rock.

The Type Selection Report further provides that the reconstructed south-bank retaining wall will accommodate the Cedar Ravine culvert outlet.

Final structural and hydraulic design of the retaining wall, culvert outlet, foundations, and any necessary erosion or scour protection will be completed during PS&E based on the applicable hydraulic and geotechnical design requirements, as detailed in Global Response 6. Accordingly, the retaining wall and outlet will be designed to accommodate the anticipated hydraulic conditions at the confluence and to protect the proposed improvements from erosion and scour. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-37: The commenter contends that Hangtown Creek is a perennial stream, not "ephemeral" and that it does not necessarily lack forage habitat because it is a Class I trout stream. The commenter references Section 4.3.2.4 Animal Species in the REIR, a

section that specifically discusses the potential existing presence of northwestern pond turtle in Hangtown Creek.

The REIR, on page 124 and 125, incorrectly states that the Hangtown Creek does not provide suitable habitat for northwestern pond turtle "…due to its ephemeral nature…". The REIR has been revised to delete this specific phrase as shown below:

Hangtown Creek does not provide suitable habitat for this species most of the year due to its lack of suitable basking structure, heavy canopy shading, lack of forage (aquatic vegetation, fish, and amphibians), and urban setting.

This revision is consistent with the Natural Environment Study that was updated for the proposed project in July 2026. The City acknowledges the comment regarding Hangtown Creek as being a Class I trout stream; however, refer, to Response LR6-15 regarding impacts to trout and Response LR1-7 regarding the use of the term "intermittent" as it relates to Hangtown Creek.

LR6-38: The commenter references Section 4.3.2.4 Animal Species and expresses concern that removal of mature trees along Hangtown Creek would reduce potential nesting habitat for migratory birds and raptors, reduce creek shading, and conflict with the Hangtown Creek Master Plan goal of maintaining shade for the cold-water fishery. The commenter recommends preservation of trees within the creekside viewing area and along the north bank of Hangtown Creek.

Please refer to Global Response 6 and Responses LR1-3, LR6-14 and LR6-20 regarding tree preservation, removal, replacement planting, and landscaping. Please also refer to Response LR1-8, which specifically addresses migratory birds and raptors and the availability of nesting and foraging habitat within the project area.

Section 4.3 Biological Resources of the REIR recognizes that valley foothill riparian habitat along Hangtown Creek and nearby montane hardwood-conifer habitat provide potential nesting and foraging habitat for migratory birds and raptors. The absence of observed nests during prior biological surveys does not mean that these areas cannot provide nesting habitat. Accordingly, Mitigation Measure BIO-2 (formerly Mitigation Measure BIO-4 in the REIR) requires conducting tree and shrub removal during the non-breeding season where feasible, conducting preconstruction nesting surveys when work occurs during the nesting season, and establishing the appropriate no-work buffers around active nests if identified during the preconstruction nesting surveys.

The commenter's concerns regarding the longer-term loss of mature tree canopy and creek shading are addressed separately through the vegetation preservation, riparian habitat mitigation, and replacement planting requirements identified in Section 4.3 Biological Resources and Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR), and are further discussed in Global Response 6 and Responses LR6-14 and LR6-20. Please refer to LR1-8 for information on nesting activity and appropriate mitigation measures and buffers. Thus, the REIR does not rely solely on whether birds or raptors are presently nesting in individual trees when evaluating project effects.

The commenter's preference for preservation of additional mature trees is noted and tree removal will be developed further during final design consistent with the project footprint and applicable engineering, safety, environmental, and mitigation requirements. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-39: The commenter restates Threshold B and refers to the discussion in Section 4.3 Biological Resources of the REIR, specifically pertaining to valley foothill riparian habitat. The commenter then references that Placerville General Plan Section V. Policy I.5 states the City shall preserve creeks in as natural a state as possible. The commenter concludes with asking if retaining walls proposed on the south bank could not be reconstructed to avoid elimination of bank habitat and suggest implementation of a segmented retaining wall south of the creek which the commenter contends could restore a natural streambank and help with flood control.

With respect to consistency of the proposed project with the General Plan, consistency with applicable General Plan policies and other local plans is addressed in Section 4.8 Land Use and Planning of the REIR. In addition, please refer to Responses LR6-16, LR6-21, and LR6-29 regarding discussions of consistency with General Plan policies, including Section V. Policy I.5.

Threshold B in Section 4.3 Biological Resources of the REIR identifies the permanent loss of riparian vegetation associated with the proposed project as a potentially significant impact, thus requiring implementation of Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR). The REIR therefore does not assume that the existing riparian condition would remain unchanged or that impacts to the Hangtown Creek corridor would be avoided entirely.

The commenter's recommendation to use a segmented or setback retaining wall to create additional natural streambank represents a potential design modification. The precise configuration of the retaining wall will be further refined during PS&E and must account for applicable structural, geotechnical, hydraulic, roadway, property, environmental, and permitting requirements (see General Response 6). To the extent feasible, final design will balance the requirements of best management practices and required mitigation with the structural, geotechnical, hydraulic, roadway, and property requirements established in the REIR.

With respect to the commenter's suggestion that a segmented retaining wall could improve flood conditions, Section 4.7 Hydrology and Water Quality of the REIR evaluates the proposed project's effects on Hangtown Creek hydraulics and flooding. Any modification to the retaining wall configuration during final design would require demonstrating that it is hydraulically compatible with the bridge and creek improvements and would be subject to applicable resource-agency permitting requirements.

The commenter's recommendation is noted for consideration during final design. However, the comment does not demonstrate that the impacts to riparian habitat identified under Threshold B have not been adequately disclosed or mitigated in the

REIR. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-40: The commenter references analysis under Threshold B in Section 4.3 Biological Resources, specifically pertaining to effects on the loss of montane hardwood-conifer forest habitat due to project implementation. The commenter then states, based on the analysis, that canopy loss can be minimized with park protection.

Please refer to Global Response 6 and Responses LR6-14 and LR6-20 regarding the creekside viewing area, tree preservation, vegetation removal, replacement planting, and opportunities to minimize tree removal during final design. In addition, Threshold B in Section 4.3 Biological Resources of the REIR identifies the permanent loss of montane hardwood-conifer habitat as a potentially significant impact and requires implementation of Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR), which includes preservation of native vegetation where feasible and compensation for permanent habitat loss.

The commenter's recommendation to preserve additional tree canopy is noted. As discussed in the referenced responses, opportunities to retain existing trees and vegetation will continue to be considered during final design where feasible and consistent with the project footprint and applicable engineering, safety, environmental, and mitigation requirements. However, preservation of the existing creekside viewing area would not necessarily avoid all vegetation impacts occurring elsewhere within the project footprint. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-41: The commenter references Mitigation Measure BIO-5 and questions why permanent impacts to riparian and montane hardwood-conifer habitat are compensated at a 3:1 ratio when a 1:1 replacement ratio is identified elsewhere in the REIR. The commenter also opposes the use of off-site mitigation or mitigation bank credits and requests that mitigation occur on site.

Please refer to Global Response 6 and Responses LR6-14 and LR6-20 regarding tree preservation, replacement planting, and mitigation for vegetation and habitat impacts. Please also refer to Response R1-6 regarding the use of on-site and off-site compensatory mitigation.

As detailed in LR6-14, the 1:1 and 3:1 ratios address different types of impacts and are therefore not inconsistent. The 1:1 ratio requirement applies to replacement of individual trees removed by the proposed project; however, it should be noted that the REIR also states that this replacement ratio could be higher where required by applicable natural-resource permits. The 3:1 ratio requirement in Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR) applies to permanent degradation or loss of riparian and montane hardwood-conifer habitat. The higher habitat mitigation ratio accounts for the loss of the functions and values provided by these sensitive natural communities and is separate from individual tree replacement requirements.

The City acknowledges the commenter's preference that compensatory mitigation occur within the project area. Please refer to Responses LR1-6, LR6-14, LR6-20 regarding location of vegetation and tree replacement.

No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-42: The commenter asks if the planting plan will be available for public comment and requests the use of the Hangtown Creek Master Plan as a reference for planting plans.

The landscaping and streetscaping plans will be finalized during the PS&E portion of the project through City coordination with interested stakeholders as discussed in Global Response 6. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-43: The commenter contends that the 3:1 mitigation for replacement of riparian and montane hardwood-conifer habitat must occur on site and not at offsite locations.

The City acknowledges the commenter's preference that compensatory mitigation occur within the project area. Please refer to Responses LR1-6, LR6-14, LR6-20 regarding location of vegetation and tree replacement.

Accordingly, the commenter's preference for mitigation along Hangtown Creek is noted, but does not require modification of Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR). No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-44: The commenter contends that the renderings show the north slope of Hangtown Creek devoid of vegetation and requests what the planting plan for the area is.

As discussed in Global Response 4, the REIR expressly identifies the renderings as conceptual and for illustrative purposes only. Please refer to Global Response 6 regarding development of the final landscape and revegetation plans, and Responses LR6-14 and LR6-20 regarding tree preservation, replacement planting, and restoration of vegetation affected by the proposed project. Final landscaping and streetscaping plans for the proposed project will be finalized during the PS&E stage of the project and will be coordinated through the City and interested parties. No revision to the environmental analysis of the REIR is necessary in response to this comment.

As described in Section 4.3, Biological Resources, and Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR), a detailed planting plan will be prepared to restore temporarily disturbed riparian areas using appropriate native vegetation. The precise species, quantities, sizes, and planting locations have not yet been established because these details will be developed during final design and resource agency permitting, when the final limits of disturbance and areas available for revegetation are known.

As discussed in LR6-13, LR6-18 and LR6-32, the conceptual renderings contained in Section 4.1, Aesthetics, are intended to illustrate anticipated project features and visual changes and do not depict the planting plan required by Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR).

No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-45: The commenter references discussion in the REIR and Mitigation Measure BIO-6 contending that mitigation can only occur on site and not at off-site locations or through the purchase of mitigation bank credits.

Please refer to Responses LR1-6 and LR5-9 regarding the use of on-site, watershed-based, and mitigation bank options for compensatory mitigation. As discussed therein, the final form and location of compensatory mitigation will be determined in coordination with the applicable resource agencies and must satisfy applicable permitting and mitigation requirements.

The commenter's preference for local mitigation is noted. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-46: The commenter references Section 4.3.6 Cumulative Impacts in Section 4.3 Biological Resources of the REIR and contends that impacts would be less than significant only if mitigation were to occur on site and not at off-site locations.

Please refer to Responses LR1-6 and LR6-40 through LR6-43 regarding compensatory mitigation and the use of mitigation banks. The effectiveness of Mitigation Measures BIO-3 (formerly Mitigation Measure BIO-5 in the REIR) is based on their requirements to compensate for unavoidable impacts to affected biological resources, not solely on whether the mitigation occurs within the project site. Any compensatory mitigation must satisfy the requirements of the applicable mitigation measures as well as resource agency permits and approvals.

The commenter's preference for on-site mitigation is noted. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-47: The commenter references Section 4.4 Cultural Resources regarding replacement of approximately 200 feet of the Hangtown Creek retaining wall and recommends that the replacement wall be designed to complement the replacement bridge, abutments, and wingwalls as part of a coordinated aesthetic design.

Please refer to Global Response 4 regarding the historic character of the project area and architectural treatment of the replacement bridge and associated features, and Global Response 6 regarding refinement of retaining wall finishes and other aesthetic treatments during PS&E.

As discussed in Section 4.4 Cultural Resources of the REIR, although the existing concrete retaining wall is assumed to contribute to the assumed-eligible Placerville Main Street Historic District, it is itself a replacement of an earlier rock wall and is constructed of materials and design typical of its period. The REIR therefore concludes that removal

of this approximately 200-foot segment would not adversely affect the qualities for which the Placerville Main Street Historic District is assumed eligible.

The reference in the REIR to an aesthetic treatment that would "mimic" the existing wall establishes a context-sensitive treatment for the replacement wall; it does not require the final wall to be designed independently of the replacement bridge. As discussed in Global Response 6, final finishes, textures, colors, architectural treatments, and treatments of the retaining walls, bridge abutments, and wingwalls will be refined during PS&E. The commenter's recommendation that these elements be designed as a coordinated aesthetic treatment compatible with the surrounding historic setting is noted for consideration during final design.

No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-48: The commenter identifies in Section 4.4 Cultural Resources Section 4.4.7 Project Impacts Threshold C discussion that there is a sentence that is repeated. The City appreciates this comment. The REIR has been revised to delete the repeated sentence as follows:

Buried human remains that were not identified during field surveys could be inadvertently unearthed during excavation activities, which could result in damage to these human remains.

This revision does not affect the analysis and adequacy of the REIR.

LR6-49: The commenter asks how stormwater runoff and pollutants from the reconfigured Ivy House parking lot will be managed following construction and recommends consideration of permeable pavement, such as porous asphalt.

Section 4.7 Hydrology and Water Quality of the REIR separately evaluates construction-period and operational stormwater impacts. The proposed project would incorporate low-impact development (LID) features and post-construction best management practices (BMPs) to reduce pollutants in stormwater runoff, with long-term maintenance and monitoring to confirm their effectiveness. The REIR also recognizes the potential increase in impervious surface associated with the proposed improvements and evaluates the resulting runoff under the applicable thresholds in Section 4.7.5 Project Impacts.

The commenter's recommendation to use porous asphalt or other permeable pavement is noted. Permeable pavement may be considered where feasible and appropriate based on applicable engineering, drainage, maintenance, funding, and water-quality requirements; however, the REIR does not identify permeable pavement as necessary to reduce an environmental impact to a less-than-significant level. The REIR does not require a particular pavement material to achieve the applicable stormwater performance requirements.

No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-50: The commenter references the Cedar Ravine flow estimates in Section 4.7 Hydrology and Water Quality and asks whether flows from Cedar Ravine could undermine the proposed retaining walls, wingwalls, and bridge abutments and how long it would take for such degradation to occur.

Please refer to Response LR6-36 regarding the Cedar Ravine outfall and protection of the proposed retaining walls, and Global Response 6 regarding structural and hydraulic details to be finalized during PS&E.

The REIR, Preliminary Hydraulic Study, and Type Selection Report do not identify a specific timeframe for the onset of structural degradation because the proposed facilities are to be designed to withstand the applicable hydraulic and scour conditions rather than assuming that degradation will occur after a predetermined period. Accordingly, the cited Cedar Ravine flows do not, by themselves, demonstrate that the proposed structures would be undermined.

No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-51: The commenter references the existing storm drain and utility facilities that discharge to Hangtown Creek and asks whether the existing drainpipes will be consolidated beneath the replacement bridge abutment to reduce their visual prominence.

Please refer to Global Response 4 regarding aesthetic treatment of project features, and Global Response 6 regarding drainage, utilities, and other engineering details to be refined during PS&E.

The REIR identifies the existing drainpipes and utilities as part of the existing condition but does not specify that all storm drain outlets would be consolidated beneath the bridge abutment. The Type Selection Report indicates that various storm drain pipes would be relocated as necessary to accommodate the proposed improvements. The final configuration and location of storm drain outlets will be determined during PS&E based on drainage, hydraulic, maintenance, environmental, structural, and utility requirements (see Global Response 6).

The commenter's recommendation to consolidate or otherwise reduce the visual prominence of drain outlets is noted for consideration during final design where feasible. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-52: The commenter references the discussion of existing flooding conditions along Hangtown Creek and recommends use of segmented or terraced retaining walls to increase water conveyance and emulate a more natural channel configuration. The commenter also recommends that the proposed project establish standardized creek setback policies for future development.

Please refer to Response LR6-10 regarding the hydraulic performance and design of the proposed bridge and retaining walls and Response LR1-3, LR5-6, LR6-11 regarding the applicability of creek setbacks. As discussed therein, the hydraulic analysis

demonstrates that the proposed bridge would improve conveyance and lower upstream water-surface elevations during the 50- and 100-year storm events.

The commenter's recommendation for segmented or terraced retaining walls represents an alternative design concept. The retaining walls are necessary to support the proposed roadway, bridge approaches, and parking lot improvements, and their final configuration will be refined during PS&E consistent with applicable hydraulic, structural, geotechnical, environmental, and right-of-way constraints, as discussed in Global Response 6. The REIR does not identify terraced retaining walls as necessary to avoid or mitigate a significant flooding impact.

Establishment of standardized setback requirements for future private development along Hangtown Creek is a broader City planning and policy matter and is outside the scope of the proposed project. As discussed in Response LR6-11, the Hangtown Creek Master Plan setback provisions are recommendations for future General Plan and zoning implementation and are not currently codified setback requirements.

The commenter's design and policy recommendations are noted. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-53: The commenter points out in Section 4.7.3.2 State Plans, Policies and Regulations of the REIR that the word "Boar" is missing a "d". The commenter also requests clarification on what the Total Maximum Daily Loads (TMDL) will be for the Ivy House parking lot and if more permeable materials can be used.

The City acknowledges the spelling error and the REIR has been revised in this section as follows:

The State Water Resources Control Board (SWRCB) and Regional Water Quality Control Board (RWQCB) are responsible for establishing the water quality standards (objectives and beneficial uses) required by the CWA and regulating discharges to ensure compliance with the water quality standards.

Regarding the comment pertaining to TMDL and the use of more permeable materials, a TMDL is established for a specific pollutant in an impaired waterbody or watershed; it is not a numerical limit assigned generally to runoff from an individual impervious surface or parking lot. Accordingly, the REIR does not identify a separate "TMDL for the Ivy House parking lot." Rather, Section 4.7 Hydrology and Water Quality of the REIR evaluates whether project-generated runoff would substantially degrade water quality or provide substantial additional sources of polluted runoff.

As discussed in Section 4.7 Hydrology and Water Quality, the proposed project would slightly increase impervious surface; however, LID features and post-construction BMPs would be incorporated into the project design, with long-term maintenance and monitoring to confirm their effectiveness in reducing pollutants in runoff.

The commenter's recommendation to use permeable pavement is noted. Permeable pavement may be considered as a potential LID feature during final design, subject to applicable engineering, drainage, maintenance, and water-quality requirements. No

revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-54: The commenter references the REIR's discussion of the slight increase in impervious surface associated with the proposed project and recommends use of permeable pavement and preservation of the existing creekside viewing area to increase infiltration and reduce stormwater runoff.

Please refer to Responses LR6-49 and LR6-53 regarding permeable pavement and Responses LR1-2, LR5-5, LR6-7, and LR6-12 regarding preservation and relocation of the existing creekside viewing area.

Section 4.7 Hydrology and Water Quality of the REIR recognizes that the proposed project would slightly increase impervious surface and incorporates LID features and post-construction BMPs to reduce runoff and pollutants, with long-term maintenance and monitoring. As discussed in Global Response 6, the specific LID features and materials will be refined during final design. Permeable pavement may be considered where feasible and appropriate based on applicable engineering, drainage, maintenance, funding, and water-quality requirements; however, the REIR does not identify permeable pavement as necessary to reduce an environmental impact to a less-than-significant level.

The commenter's recommendations regarding permeable pavement and retention of additional landscaped areas are noted for consideration during final design. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-55: The commenter references Section 4.7.5 Project Impact Threshold B discussion that references implementation of Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR). The commenter contends that vegetation replacement should be at a 3:1 ratio and only occur onsite.

Please refer to Responses LR1-3, LR1-5 and LR6-14 regarding vegetation replacement, habitat compensation ratios, and the use of on-site and off-site mitigation. The revegetation required by Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR) addresses temporary construction disturbance and is distinct from the compensatory mitigation required for permanent habitat impacts. A 3:1 replacement ratio is therefore not required for temporary disturbance.

The commenter's preference for a 3:1 ratio and exclusively on-site mitigation is noted. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-56: The commenter references the analysis under Threshold C in Section 4.7 Hydrology and Water Quality and contends that mitigation should be required because the reconfigured Ivy House parking lot would extend closer to Hangtown Creek and could increase impervious surface and stormwater runoff. The commenter recommends retaining the existing setback to avoid any increase in runoff.

Please refer to Responses LR1-3, LR5-6, LR6-11 regarding the creek setback, stormwater runoff, permeable pavement, and incorporation of LID features.

Section 4.7 Hydrology and Water Quality, Section 5.7.5 Project Impacts, Threshold C of the REIR acknowledges that the proposed project could slightly increase impervious surface and associated runoff. The reconstructed Cedar Ravine Culvert would maintain drainage capacity, and LID features and BMPs would be incorporated into the project design, with long-term maintenance and monitoring. Accordingly, the REIR concludes that the proposed project would not substantially increase runoff in a manner that would cause or exacerbate flooding, and additional CEQA mitigation is not required.

The commenter's preference to retain the existing setback is noted; however, as discussed in Response LR6-11, the Hangtown Creek Master Plan setback is a policy recommendation rather than an adopted regulatory setback requirement. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-57: The commenter references the analysis under Threshold D in Section 4.7 Hydrology and Water Quality and contends that even a relatively small increase in impervious surface and stormwater runoff would contribute to the cumulative effects of flooding in Hangtown Creek.

Please refer to Responses LR6-10, LR6-51, and LR6-56 regarding existing flooding conditions, hydraulic performance of the proposed project, and stormwater runoff.

Section 4.7 Hydrology and Water Quality of the REIR acknowledges the existing flooding conditions within Hangtown Creek and identifies that the proposed project would result in a slight increase in impervious surface. However, the fact that a proposed project contributes incremental runoff does not, by itself, establish a significant cumulative impact under CEQA. Pursuant to CEQA Guidelines Sections 15130 and 15065(a)(3), the relevant consideration is whether the project's incremental contribution would be cumulatively considerable when considered together with the effects of past, present, and probable future projects. The REIR addresses this issue in Section 4.7.6 Cumulative Impacts. At the project level, the increase in impervious surface and runoff would not be substantial; the Cedar Ravine Culvert would be reconstructed to maintain drainage capacity; and LID features and BMPs would be incorporated into the project design to manage runoff and reduce pollutants. Accordingly, the proposed project's incremental contribution to cumulative flooding would not be cumulatively considerable.

The commenter's concern regarding existing and cumulative flooding conditions in Hangtown Creek is noted; however, the comment does not provide new information demonstrating that the cumulative impact analysis or conclusions in the REIR should be changed. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-58: The commenter references Table 4.8-1 specifically the consistency analysis for Section VII. Policy A.5 in the REIR and requests that if invasive species are to be removed, then specifically state they will be removed.

The consistency analysis for Section VII. Policy A.5 in Table 4.8-1 of the REIR states, previous to the sentence the commenter questions, *"Construction of the proposed project would result in a net positive impact due to invasive species removal."* Thus, it is

implied that invasive species will be removed during project construction as a result of vegetation removal. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-59: The commenter notes that the Ivy House parking lot appears to be used at less than 60% capacity during the week and suggests that protecting the mini-park would be a reasonable compromise if the proposed project would still result in a net gain of 11 parking spaces. The commenter asks how many parking spaces would be lost if the existing creekside viewing area were preserved and argues that environmental benefits such as stream setbacks, runoff control, flood management, and maintaining a natural viewscape could offset the reduction in parking.

The REIR does not identify the number of parking spaces that would be affected by the commenter's proposed modification to preserve the existing creekside viewing area. Determining that number would require development of a different parking lot configuration and the analysis that the commenter is requesting is beyond the scope of the proposed project. It should be noted, that since the recent opening of new businesses in the 600-700 block of Main Street, the Ivy House parking lot has had a higher utilization. As discussed in Responses LR1-2, LR5-5 and LR6-12, the proposed project does not eliminate creek viewing opportunities; the creekside viewing area would be relocated to the north bank of Hangtown Creek with access from Clay Street and the El Dorado Trail.

No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-60: The commenter asks if Caltrans requires sidewalks on both sides of the new bridge, and, if not, can the width of the bridge be narrowed to reduce coverage over Hangtown Creek.

Please refer to Global Responses 1 and 2 regarding the proposed bridge configuration, pedestrian improvements, and project objectives; Responses LR5-4, LR6-3, and LR6-24 regarding the bridge width, bridge pedestrian improvements, and project objectives; and Response LR6-28 regarding the suggestion to provide a sidewalk on only one side of the bridge.

Please refer to Response LR6-3 for a discussion on creek "daylighting." Caltrans design guidance provides that sidewalks on bridges be provided where sidewalks or other pedestrian facilities follow the roadway. The proposed sidewalks on both sides are components of the project design intended to meet the project objectives and provide continuous pedestrian circulation and connectivity between Main Street, Clay Street, surrounding neighborhoods, and the El Dorado Trail. Please refer to Global Response 1 for information on project objectives.

The commenter's suggestion to eliminate one sidewalk to reduce the bridge footprint and coverage of Hangtown Creek is noted. As discussed in the referenced responses, Section 4.3 Biological Resources of the REIR does not identify the need to eliminate a sidewalk as necessary to avoid or reduce a significant environmental impact to Hangtown Creek. In addition, providing sidewalks on both sides of the proposed Clay

Street Bridge supports the project objectives related to pedestrian access and safety, and the REIR does not identify elimination of a sidewalk as necessary to avoid or reduce a significant environmental impact.

No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-61: The commenter questions whether the Cottonwood Phase 4 and 6 Project's required contribution is proportional to the traffic and air quality impacts it will generate. They also note a typographical error, stating that "manor" should be corrected to "manner." Additionally, the commenter identifies a potential inconsistency in the traffic analysis: the project is described as necessary to safely accommodate traffic from the Cottonwood Phase 4 and 6 Project, yet it is also stated that it will not increase roadway capacity on Clay Street, Main Street, or Cedar Ravine Road, raising concerns about whether the project is truly non-growth-inducing.

Please refer to Response LR4-5 and LR4-6. The Cottonwood Phase 4 and 6 Project is not under the scope or purview of this proposed project. The proposed project in itself would not generate new/increased traffic volumes but would accommodate anticipated growth per the Placerville General Plan from such planned and approved developments such as the Cottonwood Phase 4 and 6 Project. Therefore, the REIR is accurate in concluding that the proposed project is not growth-generating but would be developed to accommodate planned and approved residential development in the City. No revision to the environmental analysis of the REIR is necessary in response to this comment.

The City acknowledges the spelling error and the REIR has been revised in Section 5.14.3 Analysis as follows:

The proposed project is necessary to accommodate traffic generated by the Cottonwood Phase 4 and 6 Project in a safe manner.

LR6-62: The commenter references Section 6.5.1 of the REIR which discusses the Construct New Clay Street Bridge Parallel to Existing Bridge with Clay Street Realignment Alternative and contends that this alternative should not be considered as it increases visual impacts and increases cover over Hangtown Creek.

The commenter is correct that this alternative is not the proposed project. It is evaluated in Chapter 6 as part of the REIR's alternatives analysis. CEQA Guidelines Section 15126.6 requires an EIR to describe and evaluate a reasonable range of alternatives that could feasibly attain most of the project objectives while avoiding or substantially lessening one or more significant effects of the proposed project. Evaluation of an alternative in the REIR does not indicate that the City has selected or intends to construct that alternative.

As discussed in Section 6.5 Alternative Considered but Eliminated from Further Analysiss, this alternative would retain the existing bridge for pedestrian and bicycle use and construct a second bridge adjacent to it. The REIR concludes that the additional bridge structure would increase the overall scale and visibility of the crossing and result

in greater aesthetic impacts than the proposed project. The commenter's agreement with these concerns is noted.

No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR6-63: The commenter conveys gratitude for the City accepting their comments. The City acknowledges this comment. Refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

7.3.4.13 Comment Letter LR7: Sue Taylor

Letter Response 7

Sue Taylor
Property Owner within the Placerville Central Business District
301 and 305 Main Street
Mailing Address:
P. O. Box 961
Camino, CA

March 12, 2024

City of Placerville
Attn: Melissa McConnell
Interim City Engineer
3101 Center Street,
Placerville, CA95667

SUBJECT:
Clay Street Bridge (25C-0117) Replacement Project
Recirculated DRAFT Environmental Impact Report (REIR)

Dear City of Placerville and interested parties,

According to the City, the Clay Street Bridge Replacement and Realignment project has been considered by the City for nearly 60 years and adopted into the Master Street Plan and Improvement Program by the City Council in January of 1975.

In September of 2006, the City received approval for the project to be included into the Highway Bridge Program (HBP). HBP funds can be used to fund the environmental, design, right of way, and construction phases of the project.

The City also acquired funding for a Roundabout to be included in this project.

The first planning document released was a draft Initial Study / Mitigated Negative Declaration (IS/MND) in August 2010.

LR7-1

The City Council approved a Mitigated Negative Declaration and the project was legally challenged by the Friends of Historic Hangtown. In 2012, the City was ordered to void all approvals and findings for the project and prepare an adequate Environmental Impact Report in compliance with California Environmental Quality Act and the Court's Judgments.

The Court's judgments required the city to consider and disclose potential impacts to various subject matter including but not limited to traffic, parking, urban decay, biological resources, cultural resources, hazardous materials, aesthetics, growth-inducing impacts, and planning consistency.

The roundabout and realignment were very controversial which had provoked the lawsuit to be filed against the City. In the City's determination to continue with the project the citizens of Placerville were driven to pass Measure K that prevents the construction of roundabouts unless agreed to by the voters. As the citizens were gathering signatures, on July 8, 2014, the city removed the roundabout from the project, we would assume to supervene the initiative from passing. Opponents of this project were very concerned by the willingness of the City to spend public funds for very slim benefits with such large economic, historical and quality of life losses, and it was felt that the publics concerns were not being heard.

On January 27, 2015, the City Council directed staff to proceed with the bridge replacement and realignment. This would necessitate the realignment of Clay Street to form a new four-way intersection with Main Street and Cedar Ravine Road and the moving of the Druid monument. There were at least 6 other actions approved on this item in regards to this project

In 2018, after pleas were made to the Federal Government to require a NEPA study and Section 106 Consultation with concerned parties, Friends of Historic Hangtown and other interested parties were scheduled to meet with different State and Federal agencies on June 6, 2018 to comply with the 106 Consultation request. As far as I can recall FOHH was not further engaged in consultation to provide a better project, but FOHH did provide comments for something in 2019. Any future engagement that may have happened would have to be researched in which the time line to comment on this REIR does not allow the time to do so. Given that FOHH is being allowed extended time to comment on the EIR and REIR FOHH will add that history as determined in a future document.

LR7-1

Section 106 - Consultation

Consultation is a key part of the Section 106 process. The regulations implementing Section 106 define consultation as **"the process of seeking, discussing and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the section 106 process."**

Consulting parties include the State Historic Preservation Office (SHPO), the Advisory Council on Historic Preservation (if they choose to participate), Tribes with a historical interest in the project area, local governments with jurisdiction over the area and applicants for federal assistance. **Other consulting parties can include those with a demonstrated interest in the project due to their legal or economic relation to the project's effects on historic properties or those who are concerned with the project's effects on historic properties.**

LR7-2

Where is the consultation information regarding the local indigenous tribe that are tied to the land where Cedar Ravine ties into Hangtown Creek? How much have they been invited to participate in consultation about the project?

LR7-3

Where are the comments from the consulting parties that were invited to participate? LR7-4

Consulting parties should help determine the eligibility of the built environment resources and project effects. Mitigation measures, should have been **discussed** (2-way conversation) during consultation, yet as a consulting party myself, being the keeper of the information for FOHH, I have not been invited to or given any information regarding any continued discussions after the initial consolation on June 6, 2018. There could be documents, since it's stated that FOHH did submit comments in 2019, but discussions were non-existent. In fact, the city has chosen to continue with an adversarial relationship between themselves and the Friends of Historic Hangtown, instead of acting in a manner conductive to consultation and consensus building. Also, given the time spans between actions taken in this project, a review of what took place and documents received and responded to during consultation should have been part of this report. Also, I've attached a document that was crafted in 2018 from some of the consulting parties. LR7-5

Over the many years that the City of Placerville has been pursuing a project at this location, the purpose and justifications have changed in each proposal. In the Notice of Preparation written in August 2014 for a court ordered Environmental Impact Report (EIR), the City states*: **"The proposed project is necessary to improve roadway safety, reduce congestion, and meet current and future traffic needs".***

The Recirculated DRAFT Environmental Impact Report (REIR) claims, on page 2, that *"**the main objective** of the proposed project **is to provide a structurally sufficient and safe crossing over Hangtown Creek for all users that meets current safety, structural, and geometric standards, and that will provide adequate, reliable, and safe service for vehicular, pedestrian and bicycle traffic**."* LR7-6

According to the REIR, "**the purpose of this REIR** is to identify:

• Significant potential impacts of the project on the environment and indicate the manner those impacts can be avoided or mitigated.

• Any unavoidable adverse impacts that cannot be mitigated.

• Reasonable and feasible alternatives to the project that would attain most of the basic project objectives while avoiding or substantially lessening any of the significant effects of the project."

On Page seven:

The following are the proposed project objectives:

A. Address safety, functionality, and structural deficiencies of the necessary crossing structure over Hangtown Creek in a manner that meets modern engineering standards for bridge and road design.

B. Improve roadway public safety, traffic operations, and access by first responders.
C. Improve pedestrian and bicyclist access and safety in the project area.
D. Minimize impacts to adjacent properties.
E. Preserve and retain the existing overall historic character.

LR7-6

In these statements there is no mention of improving the culvert, moving the Druid Monument or connecting Clay Street to Cedar Ravine. In the way that this project is designed to accomplish the main objective, adding the three projects to the main objective is what is creating a significant unmitigable impact to one of the most significant elements in Placerville, California which is its cultural resources.

These are my comments from April 18, 2018:

Re: DRAFT ENVIRONMENTAL IMPACT REPORT for the City of Placerville Clay Street Hangtown Creek Bridge Replacement Project (State Clearinghouse No. 2014082024)

This comment letter is written concerning the Draft Environmental Impact Report (DEIR) Clay Street Hangtown Creek Bridge Replacement Project ("Project.")

I am a building designer that specializes in historic design and restoration of historic building structures, along with residential and commercial design work. My occupation includes everything in the course of designing structures from the design, electrical, utilities, roof, framework and structural plans. I also work with topography maps in order to design the road, drainage, landscaping, utilities, and driveways surrounding the designed structure.

LR7-7

This project directly and, as planned, adversely affects my family's business, sense of place, and connections with the history and activities surrounding this site. It is an area I pass through daily.

This project will cause a substantial adverse change in the significance of many historical resources, including the Druid monument, the 1920's era historic clay street bridge and historic drainage system connected to it, the Lincoln Highway/Central Overland Stage/Pony Express route, along with the overall historic footprint of the Ivy House building among other resources. Therefore I challenge the conclusion that "Cumulative development, including the proposed project, could result in cumulative impacts on cultural resources in El Dorado County" is a less than cumlatively considerable impact with no mitigation required. The City of Placerville in this report has abused it's discretionary

determination that the 1920 era bridge and surrounding scene is not a historical resource important enough to preserve for those throughout the world that consider Placeville as a significant historic resource and special place in time. The blantant disregard to this overall historic resource, which is the heart of Main Street, alone should be cause for the denial of this project as proposed.

Our family has spent an enormous amount of time and money to restore the Hangtown Building which is a designated State Historical Landmark.

By diminishing the integrity of the Placerville Historic District, the proposed Clay Street Bridge project will impact the value and significance of the historic building owned by me and husband on Main Street. The destruction of contributing elements to the historic district threatens its eligibility for the National Register of Historic Places. This loss of historic integrity cannot be mitigated.

The benefit of having a historic structure qualify for a Historic designation is having the ability to use the California Historical Building Code when requiring restoration. Losing the ability for structures and the site to quality jeopardizes the ability to restore and maintain these historic structures not only in this area, but in the entire stretch of Main Street. The Historic Building Code recognizes historical sites to also be significant enough for protection. LR7-7

Per the 2016 California Historical Building Code (CHBC)
SECTION 8-1003 - SITE RELATIONS

"The relationship between a building or property and its site, or the associated features of a district (including qualified historical landscape), site, objects and their features are critical components that may be one of the criteria for these buildings and properties to be qualified under the CHBC. The CHBC recognizes the importance of these relationships. This chapter shall be used to provide context sensitive solutions for treatment of qualified historical buildings, properties, district or their associated historical features, or when work to be performed secondarily impacts the associated historical features of a qualified historical building or property."

This project has been difficult to follow for the general public and even for those of us that have been tracking the project. The City has held a few workshops over the years that were stated to be for information only, but without any formal process in which information and comments were recorded. Documents have not been available to do research and some information that has been given has

been incorrect. Some of these issues are, which year the bridge was build, where the mitigation from the Cottonwood project was to be applied, what the structural problem may be where the Druid currently stands and the necessity for the project in the first place, among many others.

During these informational meetings I have asked several times that a pedestrian bridge be considered to be built to the east of the existing bridge, which I have yet to hear discussed as an alternative to replacing the bridge.

Community interaction was also an issue during the Clay Street Bridge replacement and round about project as seen below, which seems similar to the process of this current project:

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

LR7-7

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

Documents related to the project and the environmental impact were completed and piling up at the City office and yet none of the public were informed as to their existence until the Mitigated Negative Declaration was issued. When asked to view the public records citizens were faced with a number of project file folders in disarray. Documents were not available on-line nor were copies available at the public library. Community members who wished to review the reports were allowed to sit at the counter and read them during the four days a week the City office was open or were charged to make copies. Clearly these obstruction techniques were an attempt to hinder the public in becoming informed about this project.

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

The Draft EIR underplays the negative impacts of the proposed project and offers mitigation measures that were in no way sufficient to make up for the intrusion, loss of character and destruction of our historic, biological culture. Planting trees, somewhere outside of the project area do little to make up for what will be lost. The purported benefits of this project do not justify the impacts. The proposed project would have negative impacts on: scenic vistas, biological resources, environment and economy of Main Street, historic resources, and streetscapes.

This project is located on an official California's Scenic Highway. The California' Scenic Highway Program was created by the Legislature in 1963. Its purpose is to preserve and protect scenic highway corridors from change which would diminish the aesthetic value of lands adjacent to highways. The program is administered by Caltrans and regulated at the local level. The program consists of laws, incentives, and guidelines that are intended to protect the scenic, historic, and recreational resources within designated scenic highway corridors. A scenic highway corridor is defined by Caltrans as the area of land generally adjacent to and visible from the highway (California Department of Transportation, 2011). It is usually limited by topography and/or jurisdictional boundaries. These designations represent recognition of the high scenic and visual qualities of these corridors. Specific design guidelines are required and the state-designated corridors must be reviewed when improvements are proposed to determine if the highway will remain eligible for designation as a scenic corridor. It is not clear that this has been done for this project.

LR7-7

Our family values the historic significance of Placerville. We cannot understand why the City Council and staff are so determined to convert this wonderful historic place to anywhere USA. I hope that the City Council reconsiders this project and realizes that the damage from this project to the City's historic nature is too great. Let's start anew and come together at the table with the community to come up with a better solution.
Thank you for the opportunity to comment,
Sue Taylor
Building owner – Main Street, Placerville

The reason I have brought forth this history, is to make the point that the City continues to move forward with a project that was decided on around 1974 and through all these studies, consultations, public engagement, funding and postering, nothing much has changed except to spend a lot of tax dollar funds and create

years of grief and anxiety among the citizens, visitors, history lovers, and business owners of Placerville.

Going through the past documents I saw many times that alternatives were suggested that would have fulfilled the goals and objectives of this proposed project that seem to have been ignored or eliminated without much investigation or discussion.

I very much appreciate this statement in the REIR:

"An REIR is circulated to responsible agencies with permitting or jurisdictional authority over some aspects of the proposed project, trustee agencies with resources affected by the project, relevant federal agencies, interested organizations and individuals, including those that commented on the original Draft EIR. The purposes of public and agency review of a draft REIR include sharing expertise, disclosing agency analyses and new project information, checking for accuracy, detecting omissions, discovering public concerns, **and soliciting counterproposals."**

LR7-7

Given the above, after asking the consultants, at the 2-26-24 City public meeting, I was told that I could add another alternative that would be looked at, and responded to as the comments to the REIR are being reviewed. I will add that I would also volunteer to work with those providing the Bridge funding to see if the funding could be applied to aspects of this alternative. I have been successful in working with the State on other projects.

In order to mitigate the lost of Cultural Resources, the City, the decision makers, and the keepers of the funds must look at an alternative that accomplishes the main goal, without the unmitigable impact to the cultural resources.

So, moving forward, let's call this counterproposal to the REIR, Alternative 8, since I do not know how many alternatives have been evaluated.

Alternative 8: Rehabilitation of the bridge/No Clay Street realignment/Replace the rails and decking of the bridge/add a pedestrian-bicycle bridge to the East of the Bridge/Realign the sidewalk to match up with the new pedestrian-bicycle bridge/Evaluate the existing culvert and repair as necessary.

Rehabilitation of the Bridge: Remove the existing sidewalk and decking, add fill as necessary and redeck with decorative materials to compliment the historic streetscape. Repair or replace any loose or decay material in the bridge structure. If the sidewalk is not replaced that will add width to the bridge without an impact.

LR7-8

No Clay Street Realignment: The area as designed slows traffic in order to create a safe walking experience. With the parking lot and the businesses nearby, the slow traffic makes it easier to move around the area. To slow the traffic coming over the bridge it might be suggested to add a speed bump at each end or declare one side as a side to stop and yield to oncoming traffic.

Replace the rails and decking of the bridge: Bridge rails are a significant part of the character of existing bridges. The bridge rail is the portion of the bridge most readily observed by the traveling public and a change of bridge rail is considered an impact to the historic nature of the bridge. Going through Oregon, I was excited that they took on a project throughout the State to replace the railings on their bridges with rails that meet the height and safety requirements. This was a coordinated effort that took place through many jurisdictions. Below are pictures I took of one of the bridge railings being upgraded and a picture of another example from Oregon of a treatment that was used on a bridge in a historic district.

LR7-8









Figure 8-10. Oregon DOT Stealth Rail Installation



Photo from Oregon DOT.

Figure 8-11. Oregon DOT Stealth Rail Complete-In-Place

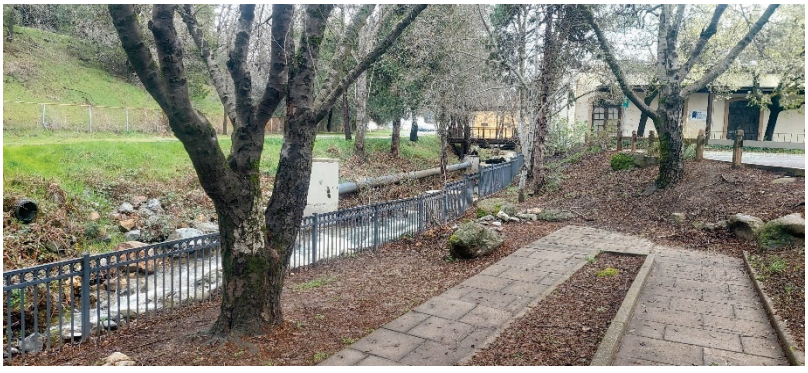


Photo from Oregon DOT.

There are many alternatives that could be used and looked at on the bridge decking to compliment the streetscape and historical elements of Placerville. It could be a community healing project to work with all the interested parties to come up with something that compliments the area.

LR7-8

Add a pedestrian-bicycle bridge to the East of the Bridge: This would be to the east and could line the sidewalk that is under the Highway 50 underpass. I would use materials from the adjacent park with the same deck material used in the path and railing that is used along the creek as shown below:



Realign the sidewalk to match up with the new pedestrian-bicycle bridge: Currently the sidewalk under the highway is outside of alignment with the Clay Street on one side. A new pedestrian-bicycle bridge could be built that would align with this sidewalk.

LR7-8





Evaluate the existing culvert and repair as necessary: This alternative would look at the structural integrity of the culvert in order to retain the Druid Monument in place. It appears from the REIR that investigating the structural issues is not going to take place until this project has been approved. The REIR did not paint a clear picture of what "could" be deficient with the existing culvert. It appears that repairs have been done to the culvert over the years and without a current evaluation or knowledge of what those repairs consisted of, and what repairs might still be lacking, the information presented is only subjective. How can one evaluate the decision to reconstruct the culvert without first studying the status of the culvert, developing plans for rehabilitation or reconstruction and then developing a plan to facilitate such a project and the cost would need to be determined. Just looking what could become a monumental project, without much understanding of current conditions it seems that it would be better to retain the culvert in place and make necessary repairs or reinforcements as they are determined. It also appears that the Druid Monument is stilling on solid ground 3' away from the culvert. Removing it to another site that is unclear as to the stability of that site, could cause more harm. Placerville is built on mining shafts that run throughout the city. Perhaps it's time to do an evaluation on the entire system.

LR7-8

I also disagree with the REIR findings in regards no need to evaluate:

Mineral resources: Really? A lot of gold came out this creek.

LR7-9

Recreation: Really? You are removing a park, no less an ADA park with accessibility to the creek. LR7-10

Utilities and Service Systems: You have forgot to deal with the drainage that will be a huge impact if you move forward with this project as planned. LR7-11

I also disagree with your continued assumption that a roundabout would be a most favorable alternative, including that it would not impact the Druid Monument. This alternative created more speed in the vicinity, less safety for pedestrians, less parking, with the Druid having to be moved to the center of the roundabout, which also happens to be on top of a main underground PG&E vault. The roundabout should not have been addressed in this REIR since its implementation is remote and speculative given the opposition and measures taken by the city residents and businesses to have it removed from the project. LR7-12

The REIR does not justify the loss of multiple cultural resources, some we are not even privy to, which could include native artifacts since that information has been sealed, that this project will impact with unmitigable and permanent loss of our historic sense of place. LR7-13

2013 CHBC
SECTION 8-1003
SITE RELATIONS

The relationship between a building or property and its site, or the associated features of a district (including qualified historical landscape), site, objects and their features are critical components that may be one of the criteria for these buildings and properties to be qualified under the California Historic Building Code (CHBC). The CHBC recognizes the importance of these relationships. This chapter shall be used to provide context sensitive solutions for treatment of qualified historical buildings, properties, district or their associated historical features, or when work to be performed secondarily impacts the associated historical features of a qualified historical building or property. LR7-14

I ask that the City, City Council, and Consultants take a serious look at the alternative that I have suggested and we work to turn the corner on the contention that this proposed project has created throughout the city over these past many years. LR7-15

Thank you for your consideration and the opportunity to comment on this proposed project. I will also be submitting comments for myself and Friends of Historic Hangtown prior to the April 15, 2024 extension date.

Thank you,
Sue Taylor

7.3.4.14 Response to Comment Letter LR7 Sue Taylor

LR7-1: The commenter summarizes the history of the project including the original CEQA IS/MND prepared, the lawsuit against the proposed project, preparation of an EIR for the proposed project, and finally preparation of an REIR for the proposed project. The commenter also notes the controversy of the proposed roundabout associated with the former design of the project, the public's opposition, and the passing of Measure K which prohibited construction of a roundabout in the City unless two-thirds of the public voted for such a feature.

The City acknowledges this comment. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR7-2: The commenter summarizes an overview of the Section 106 Consultation process in general terms. The City acknowledges this comment. Please refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR7-3: The commenter inquires the location of local Native American tribe consultation and questions how much they have been invited to participate in project consultation.

Section 4.4.4.1 Tribal and Interested Parties Consultation of the REIR provides a summary of the consultation process rather than reproducing every consultation communication or consulting-party comment within the body of the REIR. The REIR identifies Section 106 consulting parties, summarizes participation and substantive comments, and identifies the cultural resources documents through which those comments and responses were documented. Consultation will continue, as applicable, through completion of the Section 106 process. Appendix F of the REIR identifies the technical studies used in preparation of REIR and provides information regarding their availability. The Historic Property Survey Report identified in Appendix F contains the attachment documenting the consulting-party comments and responses referenced.

Please refer to Global Response 5 for additional discussion of Section 106. No revision to the REIR is necessary in response to this comment.

LR7-4: The commenter asks the location of comments from consulting parties that were invited to participate.

Please refer to Response LR7-3 for a discussion on the consultation process. Please refer to Global Response 5 for additional discussion of Section 106. No revision to the environmental analysis of the REIR is necessary in response to this comment.

LR7-5: The commenter expresses concern that consulting parties were not meaningfully involved in determining the eligibility of built-environment resources, project effects, and mitigation measures, despite consultation requiring ongoing two-way communication. The commenter states that as a representative of Friends of Historic Hangtown (FOHH), they were not invited to or informed of any substantive discussions after the initial consultation on June 6, 2018, and characterizes the City's relationship with FOHH as adversarial rather than collaborative. The commenter also

argues that the REIR should include a comprehensive review of consultation activities, correspondence, and responses over the course of the project, and references an attached 2018 document prepared by consulting parties for consideration.

Consultation did not end with the June 6, 2018 meeting. In early 2019, the City and Caltrans provided interested parties an opportunity to review and comment on the Historic Property Survey Report (HPSR), including the Historical Resources Evaluation Report (HRER) and Archaeological Survey Report (ASR). FOHH and the Wopumnes Nisenan MeWuk submitted comments. The comments and responses, as reviewed by Caltrans, were documented as an attachment to the HPSR. Paragraph 3 of Section 4.4.4.1 Tribal and Interested Parties Consultation of the REIR specifically summarizes the substance of FOHH's comments, which addressed the scope of resources evaluated for National Register eligibility, including individual properties, features, contributors and districts; the evaluation approach and conclusions; the geographic area evaluated in the cultural resources studies; and NEPA considerations.

Consulting parties were subsequently provided the draft Finding of Adverse Effect (FOAE) in late 2020 for review and comment. Comments were received from the UAOD and Friends of Historic Hangtown. Responses to comments received from on the draft FOAE were incorporated into the final FOAE prior to its submittal to Caltrans. Caltrans approved the final FOAE in May 2021 and submitted it to the State Historic Preservation Officer (SHPO) for concurrence in June 2021. The final FOAE was also provided to interested parties, and SHPO issued its concurrence on August 31, 2021. Consulting parties were subsequently provided copies of the project-specific Programmatic Agreement and Cultural Resources Management Plan on December 29, 2021.

Please refer to Global Response 5 and Response LR2-3 regarding consultation. Section 106 consultation under the National Historic Preservation Act does not require all consulting parties to agree regarding the undertaking, its effects, or appropriate mitigation. Rather, the process requires the agency to provide consulting parties a meaningful opportunity to express their views and requires those views to be considered in reaching decisions regarding historic properties. That process has been followed for this project, as the foregoing discussion demonstrates. Differences of opinion among consulting parties do not, by themselves, indicate that the consultation requirements of Section 106 have not been satisfied.

Please refer to Global Response 5 for a discussion of consultation under Section 106. The City and Caltrans will continue to consider information provided by the appropriate consulting parties in accordance with Section 106 and the applicable federal procedures. No revision to the REIR is necessary in response to this comment.

LR7-6: The commenter argues that the City's stated purpose and justification for the proposed project have changed over time, shifting from improving roadway safety, reducing congestion, and meeting future traffic needs to primarily providing a safe and structurally sufficient crossing for vehicles, pedestrians, and bicyclists. They note that the current project objectives focus on safety, access, minimizing property impacts, and preserving historic character, but do not explicitly include improvements such as the

culvert upgrade, Druid Monument relocation, or a Clay Street to Cedar Ravine connection. The commenter contends that adding these elements to the proposed project has created significant and unmitigable impacts to Placerville's cultural and historic resources that are not necessary to achieve the project's stated objectives.

The commenter is referred to Global Response 1 for additional discussion of the proposed bridge configuration, Global Response 3 regarding the Clay Street Realignment, and the relationship of the proposed project to the objectives identified in Section 3.3 Project Objectives of the REIR. In addition, please refer to Global Response 4 regarding historic character and bridge architectures, and Global Response 5 regarding the Clay Street Bridge and the Druid Monument.

CEQA Guidelines Section 15124(b) (Project Description) requires an EIR to include: "A statement of the objectives sought by the proposed project" and explains that a clearly written statement of objectives helps the lead agency (City) develop a reasonable range of alternatives and aids decision-makers (City Council) when considering project approvals.

As described in Section 3.3 Project Objectives of the REIR, the objectives of the proposed project are to: (A) address safety, functionality, and structural deficiencies of the necessary crossing structure over Hangtown Creek in a manner that meets modern engineering standards for bridge and road design; (B) improve roadway public safety, traffic operations, and access by first responders; (C) improve pedestrian and bicyclist access and safety in the project area; (D) minimize impacts to adjacent properties; and (E) preserve and retain the existing overall historic character.

The project objectives describe the underlying purposes the City seeks to accomplish through implementing the proposed project; they are not intended to constitute an itemized list of each physical improvement included in the proposed project. The individual project components described in Chapter 3 Project Description of the REIR are the means by which the proposed project would achieve those broader objectives. Accordingly, the fact that a particular physical improvement is not separately identified as a project objective does not mean that it is unrelated to the purpose of the project.

The proposed improvements are also interrelated rather than separate, unrelated projects. For example, the REIR explains that the Cedar Ravine Culvert is integrally constructed into the southern abutment of the existing Clay Street Bridge. This relationship is also reflected in Section 6.4.1 Alternative 1 – No Project/No-Build Alternative of the REIR, under which most of the Cedar Ravine Culvert would remain untouched because the existing bridge would not be replaced. The proposed roadway and intersection improvements similarly relate to the objectives of improving roadway public safety, traffic operations, first-responder access, and pedestrian and bicycle safety.

Refer to Global Response 4 pertaining to historic character and bridge architecture, and Global Response 5 pertaining to the Clay Street Bridge and the Druid Monument. Creation of the proposed four-way intersection would require relocation of the Druid Monument from its historic location. The REIR concludes that relocation would alter

both the monument's historic location and its original function as a traffic-calming feature and therefore would result in a substantial adverse change to the historical resource. Replacement of the deteriorating Clay Street Bridge would likewise result in a significant adverse change because the physical characteristics conveying the bridge's historical significance would be destroyed. The REIR therefore identifies the proposed project's cultural resource impact as significant and unavoidable.

Because of these significant and unavoidable cultural-resource impacts, Chapter 6 Project Alternatives of the REIR evaluates a reasonable range of alternatives capable of avoiding or substantially lessening impacts related to cultural resources while attaining most of the basic project objectives. Thus, the REIR does not rely on the project objectives to disregard or minimize the environmental consequences of the additional project components; rather, it discloses those effects and evaluates alternatives that could reduce them.

Accordingly, the Cedar Ravine Culvert improvements, Druid Monument relocation, and roadway/intersection modifications are components of the proposed project intended to implement the broader safety, functionality, transportation, access, and historic-character objectives identified in Section 3.3 Project Objectives of the REIR. Their environmental effects, including significant and unavoidable effects to historical resources, are evaluated in the REIR in Chapter 4 Environmental Setting, Impacts, and Mitigation Measures. No revision to the REIR is necessary in response to this comment.

LR7-7: The commenter states that, despite decades of studies, public outreach, and project development, the City has continued to advance essentially the same project while allegedly giving insufficient consideration to alternatives that could meet the project's objectives. Referring to the REIR's invitation for public comments and counterproposals, the commenter requests that an additional alternative ("Alternative 8") be evaluated. The commenter argues that this alternative should achieve the project's primary goals while avoiding or substantially reducing unmitigable impacts to cultural and historic resources and offers to assist in exploring potential funding opportunities for the alternative.

Please refer to Section 7.1.2 Environmental Review Process of this chapter where it describes that under CEQA, when an EIR is fully recirculated for public review, the recirculated draft supersedes the previous draft for purposes of public review. In that circumstance, the lead agency is not required to prepare formal written responses to comments received on the original Draft EIR. The City must prepare written responses to comments received during the public review period for the REIR, as those comments address the version of the document that serves as the basis for the Final EIR. The City acknowledges the contributions that the participants in the public comment process have made to date to refine the analysis for the REIR.

Chapter 6 Alternatives of the REIR evaluates project alternatives in accordance with CEQA Guidelines Section 15126.6, which requires an EIR to consider a range of reasonable alternatives that would feasibly attain most of the project's basic objectives while avoiding or substantially lessening one or more significant environmental effects

of the proposed project, and to evaluate the comparative merits of those alternatives. CEQA does not require consideration of every conceivable alternative; rather, the range is governed by a “rule of reason” and need only include alternatives necessary to permit a reasoned choice.

The commenter is referred to Chapter 6 Alternatives of the REIR for the complete alternatives analysis and the basis for the City’s conclusions regarding the feasibility and comparative environmental effects of the alternatives considered. No revision to the REIR is necessary in response to this comment.

LR7-8: The commenter requests an additional alternative (“Alternative 8”) be considered and analyzed in the REIR and contends this would result in less non-mitigable impacts on cultural and historic resources. The commenter suggests the alternative should focus on: rehabilitation of the bridge; no Clay Street realignment; replace the rails and decking of the bridge; add a pedestrian-bicycle bridge to the east of the bridge; realign the sidewalk to match up with the new pedestrian-bicycle bridge; and, evaluate the existing culvert and repair as necessary.

The commentor is referred to Response LR7-7 and CEQA Guidelines Section 15126.6. Additionally, alternatives may be eliminated from detailed consideration in an EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid or substantially reduce any significant environmental effects (CEQA Guidelines, Section 15126.6[c]).

Components of the commenter’s proposed Alternative 8 substantially overlap with alternatives and design concepts already considered in Chapter 6 Alternatives of the REIR. These include rehabilitation of the existing bridge, rehabilitation and reclassification of the existing bridge, retention of the existing bridge in conjunction with construction of an additional bridge, and replacement of the bridge without realignment of Clay Street. The commenter’s proposal for Alternative 8 therefore does not introduce a fundamentally different means of avoiding the proposed project’s significant effects that were not already represented within the range of alternatives already considered.

Moreover, the central component of the proposed Alternative 8 is continued use of the existing Clay Street Bridge through rehabilitation. Section 6.5.2 Clay Street Bridge Rehabilitation of the REIR and Global Response 2 evaluate bridge rehabilitation and explain that the existing bridge has reached the end of its design service life and would require substantial structural modifications to satisfy current roadway, pedestrian, and safety standards. Supplemental structural testing conducted in 2023 identified additional concerns regarding concrete strength and the structural integrity of the existing earthen fill. Based on these conditions, the REIR concludes that rehabilitation and widening of the existing bridge would not be a technologically or economically feasible solution and eliminates the rehabilitation alternative from further consideration.

The existing alternatives analysis in Chapter 6 of the REIR therefore provides a reasonable range of alternatives sufficient to permit informed decision-making and public participation, and no additional alternatives analysis is required in response to this comment.

LR7-9: The commenter disagrees with not needing to analyze mineral resources in the REIR as the commenter contends that gold has been found in Hangtown Creek.

As discussed in Section 1.5.1 Impacts Previously Determined to Need No Further Analysis and Section 5.11 Environmental Effects Found to be Less Than Significant of the REIR, the City determined the scope for the original Draft EIR based on the Writ, the Initial Study (IS) checklist included with the Notice of Preparation (NOP), and comments in response to the IS/NOP. The IS checklist determined that the following issue areas would result in no impact and are therefore scoped out of this Draft EIR: agriculture and forestry resources, mineral resources, population and housing, and utilities.

Additionally, based on the time between preparation of the Draft EIR and preparation of the REIR, the determination pertaining to mineral resources has remained unchanged as there is no new substantial evidence supporting a different impact conclusion on mineral resources. It should also be noted that impacts of a mineral resource under CEQA consider areas that are either state or locally delineated as mineral resource recovery sites, which, the project site is not. The commenter's observation regarding the historical recovery of gold from Hangtown Creek does not, by itself, demonstrate that the proposed project would result in the loss of availability of a known mineral resource of regional or statewide value or otherwise provide substantial evidence of a potentially significant mineral-resource impact requiring additional analysis.

Accordingly, the comment does not provide new information that would alter the determination that the proposed project would have no impact or a less-than-significant impact related to mineral resources. Please refer to Global Response 7. No additional mineral resources analysis or revision to the REIR is necessary in response to this comment.

LR7-10: The commenter contends that removing the creekside viewing area (with ADA access) should be analyzed under the recreation section of the REIR.

This creekside viewing area is zoned as Commercial Business District (CBD) in the City and the land has not been officially designated for recreational purposes and its primary purpose is not as a park, recreation area, or refuge. The City of Placerville considers the creekside viewing area a public amenity, and not a significant public park.

Refer to Response LR7-9. Furthermore, please refer to LR1-2, LR5-5 and LR6-5 for discussion of relocation of the creekside viewing area. This location will be level with the El Dorado Trail and will improve access, including ADA access, to the area through connection with the El Dorado Trail and Clay Street north of the proposed bridge. No additional recreation resources analysis or revision to the REIR is necessary in response to this comment.

LR7-11: The commenter references utilities and service systems and contends that the REIR did not analyze the drainage of the area due to project implementation. Please refer to Section 4.7 Hydrology and Water Quality of the REIR, where Thresholds B, C, and D discussions fully analyze the changes in drainage patterns due to proposed project implementation and identify revegetation requirements through Mitigation Measure BIO-3 (formerly Mitigation Measure BIO-5 in the REIR) that would retain

adequate drainage in the area. The analysis also concludes that improvements to the Cedar Ravine culvert would improve drainage patterns in the project area resulting in less than significant impacts. No revision to the REIR is necessary in response to this comment.

LR7-12: The commenter disagrees that the REIR determines that the roundabout alternative is the environmentally superior alternative for the proposed project. The commenter opines that alternative created more speed in the vicinity, less safety for pedestrians, less parking, with the Druid monument having to be moved to the center of the roundabout, which also happens to be on top of a main underground PG&E vault.

The purpose of an EIR alternatives analysis is not limited to alternatives currently preferred by the City or the public. Rather, Chapter 6 Alternatives of the REIR evaluates a reasonable range of alternatives capable of avoiding or substantially lessening significant environmental effects while attaining most of the project's basic objectives. Alternative 3 - Clay Street Bridge Replacement with Roundabout (Alternative 3) was retained because it provides a meaningful comparison to the proposed project and, according to the analysis in Chapter 6, would achieve all the project objectives while avoiding or reducing air quality, cultural resources, greenhouse gas emissions, and emergency response effects.

In particular, the REIR concludes that Alternative 3 would reduce the effects on the Druid Monument. Although the Druid Monument would be shifted slightly to the center of the roundabout, it would remain within the intersection with traffic circulating around it, similar to its historic setting and original placement. On this basis, the REIR concludes that Alternative 3 would avoid the significant and unavoidable impact to the Druid Monument associated with the proposed project, although replacement of the Clay Street Bridge would remain a significant and unavoidable cultural resource impact.

The REIR also does not support the commenter's assertion that Alternative 3 would result in greater traffic speeds or reduced transportation safety. The transportation analysis and REIR concludes that safety improvements under Alternative 3 would be similar to those of the proposed project, while continuous movement through the intersection would reduce idling and delays. The REIR further concludes that reduced intersection delay would improve emergency response through the project area. The commenter provides no substantial evidence that contradicts or undermines the technical expertise underlying the REIR's conclusions regarding Alternative 3.

Based on the comparative analysis, Alternative 3 would maintain or reduce most impacts associated with the proposed project, avoid the significant and unavoidable impact to the Druid Monument, and achieve all of the project objectives. For these reasons, the REIR identifies Alternative 3 as the environmentally superior build alternative, as required by CEQA Guidelines Section 15126.6(3)(2) when the No Project Alternative is identified as environmentally superior. Refer to Section 6.6 Environmentally Superior Alternative of the REIR.

Identification and evaluation of Alternative 3 in the REIR does not constitute approval or selection of the roundabout. The REIR acknowledges that a two-thirds voter approval

would be required pursuant to Measure K before a roundabout could be implemented. Rather, Alternative 3 is evaluated to provide decision-makers and the public with the comparative environmental information required as part of the CEQA alternatives analysis (CEQA Guidelines Section 15126.6). Prior public opposition to an alternative does not, by itself, eliminate its usefulness for purposes of environmental comparison, particularly where the alternative could reduce a significant environmental effect of the proposed project.

Accordingly, Alternative 3 is neither assumed to be the proposed project nor approved through its inclusion in the REIR. It is analyzed as an alternative because the REIR determined that, notwithstanding the procedural requirements associated with Measure K, Alternative 3 provides a potentially feasible means of attaining the project objectives while reducing most environmental impacts. No revision to the REIR is necessary in response to this comment.

LR7-13: The commenter contends that the proposed project would result in the loss of multiple cultural resources that the public are not aware of and that the proposed project will impact, with unmitigable and permanent loss, the public's historic sense of place.

Section 4.4 Cultural Resources of the REIR evaluates the project's effects not only on individual historical resources, but also on the assumed-eligible Placerville Main Street Historic District and the character-defining features that contribute to the district. The analysis specifically considers the relationship of resources such as the Clay Street Bridge, Druid Monument, Hangtown Creek retaining walls, and former Lincoln Highway to the historic development and character of the surrounding area. The REIR does not conclude that the proposed project would eliminate the broader historic character or sense of place of downtown Placerville as a whole. The project would retain surrounding historic buildings, the broader Main Street streetscape, Hangtown Creek corridor, and other features that contribute to the historic setting. As discussed in Section 4.1 and Global Response 4, the proposed replacement bridge and associated improvements would also incorporate context-sensitive architectural, landscape, and streetscape treatments intended to integrate the new improvements with the surrounding historic setting.

The REIR also recognizes that relocation of the Druid Monument and removal of the existing Clay Street Bridge would alter an important aspect of the historic setting and function and would result in the loss of the physical characteristics that convey both the monument's and bridge's historical significance. Thus, Section 4.4 Cultural Resources of the REIR determines that these impacts are significant and unavoidable. Refer to Global Response 5 for information and mitigation measures regarding these resources.

Furthermore, for archaeological resources, Mitigation Measure CUL-4 is included in Section 4.4 Cultural Resources of the REIR and requires archaeological monitoring and construction activities to be halted if previously undiscovered prehistoric or historic-period archaeological deposits are revealed.

LR7-14 This comment explains that a historic building's significance is not limited to the structure itself, but also includes its relationship to the surrounding site, landscape,

district, objects, and other historical features that may contribute to its eligibility under the California Historic Building Code (CHBC). It states 2013 CHBC Section 8-1003 is intended to provide context-sensitive approaches for preserving those relationships when work is performed on historic properties or when proposed work could affect associated historical features.

The City acknowledges that the CHBC provides alternative, context-sensitive approaches for work involving qualified historical buildings, properties, districts, and associated historical features, including certain site features and structures. However, the cited CHBC provision is a building-code provision addressing treatment of qualified historical properties and associated features in the context of code compliance; it does not establish the CEQA threshold for determining whether the proposed project would result in a significant impact to a historical resource, nor does it independently require preservation of all historical resources or associated features in their existing locations.

The CHBC provision cited by the commenter does not alter the impact conclusions presented in the REIR. Applicable building codes and standards, including provisions applicable to qualified historical properties where relevant, would be addressed during final design and permitting. No revision to the REIR is necessary in response to this comment.

LR7-15: The commenter reiterates their request that the City consider the “Alternative 8” in the REIR and also conveys their appreciation to be able to comment on the proposed project. The City appreciates this comment and refers the commenter to Global Response 7.

7.3.4.15 Comment Letter LR8: Cheryl Bly-Chester

Letter Response 8

City of Placerville
Attn: Melissa McConnell
Interim City Engineer
3101 Center Street
Placerville, CA95667

March 12, 2024

SUBJECT Clay Street Bridge Replacement EIR

Dear City of Placerville:

I am writing with concerns about the ability of the selected alternative in the Clay Street Bridge Replacement Project to meet the objectives of the project or to adequately mitigate the impacts. I worry that the project may do more harm than good from an environmental, public safety, and historical resource perspective.

I am a licensed civil engineer who began my career in the 1970s as a bridge engineer for Caltrans. In fact, I was the first woman engineer in the Caltrans Bridge Maintenance Section. Coincidentally, I covered District 3, which would have included inspecting this very bridge, although I have no specific recollection of it that stands out. So believe me, I understand the impetus when told that the bridge qualifies for replacement funding to start driving towards that goal. However, qualifying for replacement does not mean requiring replacement. In this case, with no significant current risks and the likelihood of creating a problem where none exists, this alternative may not be in the People of Placerville's interests. At a minimum, it warrants a much closer look.

LR 8-1

First of all, the Caltrans inspection notes are not well-aligned with the project description or executive summary, so it looks as though finalizing this EIR may be premature while the staff research and/or correct this. I have attached the Caltrans Inspection notes. One Indicator of discrepancies existing include that Caltrans has the bridge built in 1940, whereas the RDEIR states it was built in 1926. If the bridge was, in fact, built in 1926, and if, as I suspect, this bridge was designed by Daniel B. Luten (an important bridge designer) then it is possible the bridge may be eligible for historic standing.

With regard to the project being able to meet its purpose, the stated objectives of the Clay Street Bridge Replacement Project are:
A. Address safety, functionality, and structural deficiencies of the necessary crossing structure over Hangtown Creek in a manner that meets modern engineering standards for bridge and road design.
B. Improve roadway public safety, traffic operations, and access by first responders.
C. Improve pedestrian and bicyclist access and safety in the project area.
D. Minimize impacts to adjacent properties.
E. Preserve and retain the existing overall historic character.

Caltrans records describe the bridge as built in 1940. The design of the bridge is a single span bridge with a secondary arch culvert opening, closed spandrel arch, earth-filled, cast-in-place, reinforced concrete bridge and adjacent culvert opening with a decorative open concrete railing.

LR 8-2

With regard to Objective A, there is no doubt that any bridge built in 1926, or 1940, was not designed with modern standards in mind. That being said, the bridge is historically important to the people of Placerville, and perhaps the National Registry, and the surroundings are of cultural/archeological importance. Given that a primary objective of the project is retaining the existing historic character of the bridge, then improving functionality and structural deficiencies must be evaluated in terms of addressing problems that have arisen or are likely to arise in the foreseeable future that cannot otherwise be addressed except through complete replacement of the bridge. The proponents of the bridge replacement have failed to make that case.

The safety issues discussed in Objective A would necessarily involve bridge failure or risk of failure such as with fracture critical designs. This bridge is not fracture critical and in 2022, Caltrans inspectors declared both the

LR 8-3

bridge superstructure and substructure as "all primary structural elements are sound but may have minor section loss, cracking, spalling, or scour." This means the bridge is not in danger of substantial failure.

According to Caltrans the structural deterioration is minor, does not appear to be accelerating, and is not irreparable. It appears that the two primary features bringing the rating of the structure from "good" to "fair," are the deck and the railing, both of which have suffered from a lack of maintenance. Replacing a bridge does fix poor maintenance. If the City has failed to provide funding for bridge maintenance in the past, it will continue to fall short on such necessary ongoing reserve funding and even new bridges will deteriorate disproportionately with their design potential. All earth-filled concrete bridges will eventually have deck subsidence issues as the fill material settles over decades to eliminate all voids and reach near 100% compaction. This requires replacing the deck and filling the subsidence void while they're at it. Replacing the deck is long over due and significantly less expensive in terms of financial, environmental, historical, and disruption impacts than a bridge replacement. The railing is downrated because it was hit by traffic and never repaired. In new bridges, if the railing is damaged by traffic and never repaired, it too would be downrated. LR 8-3

Objective B. For the project to be justified based on a need for improvement of roadway public safety, traffic operations, and access by first responders, it must first be established that there is a problem with public safety, traffic, and emergency vehicles. The proponents of the project have failed to establish any such problem. Traffic issues at the bridge appear to be rare. The report appears to identify traffic problems related to the Druid Monument and not the bridge. In fact, there are indications that replacing the bridge would encourage excess speeding within the area and approaching the intersection, thus creating more risk of higher consequence injury accidents, which actually defeats both objectives of improving public safety and improving traffic flow, neither of which appear to currently be problems. In addition, Caltrans states that the bridge can meet or exceed its load requirements, which includes emergency vehicles for first responders. LR 8-4

Objective C: Similarly, mixing cyclists and pedestrians and wheelchair access with the resulting higher speed traffic would decrease safety for all involved instead of improving it. A better solution would be to separate the pedestrian/bicyclists/accessible requirements on an adjacent new bridge away from traffic. This would enhance safety for all involved, preserve the historic bridge, and give the City a more productive place to put their "bridge" funding. LR 8-5

Objective D. Minimize impacts to adjacent properties. The planned project is significantly more impactful to the adjacent properties than repairing the historic bridge. The nearest property to the bridge is the Main Street Melters pub, which benefits from the historic ambience of the neighborhood, including the bridge, but more importantly benefits from the parking lot and the direction of flow at Clay Street, all of which would be worsened instead of improved by the project. In addition, the creek-side park setting, with the ADA access, would be eliminated. This cannot be justified. Money would be better spent on cleaning out the brush and debris from the creek and patrolling the area to prevent graffiti and other abuses of the bridge and park. The City would benefit by enticing residents and visitors to the area and retaining the historic resource that is a hallmark of Placerville. LR 8-6

Objective E: The goal of retaining the historic character is much better fulfilled by retaining the actual historic resource than by somehow trying to mimic it.

Please take the time to consider the consequences of destroying the bridge and disrupting the current uncomplicated daily ebb and flow of the area. With an impartial appraisal, you may find that a new pedestrian/trail bridge may better serve your purposes. LR 8-7

Respectfully Submitted,

Dr. Cheryl Bly-Chester, P.E.
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CherylBlyChester@aol.com

7.3.4.16 Response to Comment Letter LR8 Cheryl Bly-Chester

LR8-1 The commenter is concerned that the selected alternative for the Clay Street Bridge Replacement Project may not achieve the project's goals and could create unnecessary environmental, public safety, and historical impacts. Citing her experience as a licensed civil engineer and former Caltrans bridge engineer, the commentor notes that eligibility for replacement funding does not necessarily mean a bridge must be replaced. The commentor believes the bridge currently presents no significant risks and argues that replacing it may create problems where none exist, warranting a much closer evaluation of the proposed alternative.

The commenter is referred to Global Response 1 for a detailed discussion of the existing bridge deficiencies, the basis for the proposed bridge replacement, and how the proposed improvements relate to the objectives identified in Section 3.3 Project Objectives of the REIR.

The proposed project involves a balancing of structural, transportation, safety, environmental, adjacent-property, and historic-resource considerations. The fact that the proposed project would result in significant adverse effects to individual historical resources does not mean that it fails to meet its stated objectives; those effects are disclosed as part of the CEQA analysis and considered alongside the project's safety, functionality, multimodal access, and historic-character objectives. As discussed in Global Response 1, the City has determined that the proposed project, considered as a whole, would meet the objectives identified in Section 3.3 of the REIR. The commenter's disagreement with that determination is noted; however, the comment does not identify new information requiring revision of the REIR.

LR8-2: The commenter believes the REIR may be premature because there appear to be discrepancies between Caltrans bridge inspection records and the project documentation, including conflicting construction dates (1940 versus 1926). They note that if the bridge was built in 1926 and designed by Daniel B. Luten, it could potentially qualify for historic significance and warrant further evaluation. The comment also references the project's stated objectives and describes the bridge's existing design and characteristics as documented in Caltrans records.

The commenter is referred to Global Response 1 for a detailed discussion of the existing condition and functional deficiencies of the bridge, the engineering basis for replacement, consideration of rehabilitation, and the relationship of the proposed improvements to the project objectives identified in Section 3.3 Project Objectives of the REIR. The commenter is also referred to Global Response 5 for a discussion of the bridge's historical significance and date of construction, the proposed project's effects on the bridge, applicable mitigation, and the Section 106 process.

Accordingly, the existing Caltrans inspection records and the historical significance of the bridge are not inconsistent with the conclusions of the REIR. Both have been considered as part of the environmental and engineering evaluation of the proposed project. The determination to pursue replacement is based on the combined structural, functional, geometric, safety, traffic circulation, pedestrian, bicycle, and engineering

considerations associated with the existing crossing, while the REIR separately recognizes and discloses the significant and unavoidable effect that removal of the historic bridge would cause. The commenter's concerns do not identify new information requiring revision of the REIR. No revision to the REIR is necessary in response to this comment.

LR8-3 The commenter argues that the project proponents have not demonstrated that complete bridge replacement is necessary to address the bridge's structural or functional deficiencies, particularly given the objective of preserving its historic character (Objective A). They note that Caltrans inspection reports found the bridge's primary structural elements to be sound, with only minor deterioration and no indication of a substantial risk of failure. The commenter contends that the bridge's lower condition ratings are largely due to deferred maintenance issues, such as deck deterioration and damaged railings, which could be repaired at far lower financial, environmental, historical, and community costs than full replacement.

The City acknowledges and appreciates this comment. Please refer to Global Responses 1 and 2 for detailed discussions of the existing bridge condition, the feasibility of rehabilitation, and the engineering basis for replacement. As discussed in those responses and in Sections 3.2 Proposed Project Setting and 6.5.2 Clay Street Bridge Rehabilitation of the REIR, the decision to pursue replacement is not based solely on deterioration of the existing deck or railing, nor does it depend upon a determination that the bridge is presently at risk of imminent structural failure.

The City acknowledges that maintenance or rehabilitation could address certain individual deficiencies identified by the commenter. Repairing the railing, replacing portions of the deck, or addressing localized deterioration, however, would not address the full range of deficiencies associated with the existing crossing or accomplish the project objectives identified in Section 3.3 Project Objectives of the REIR. In particular, such repairs would not address the bridge's approximately 19-foot width and single-lane configuration, provide two travel lanes, provide standard ADA compliant pedestrian facilities on both sides of the bridge, accommodate the proposed bicycle connection, provide current crash-tested bridge barriers, or otherwise bring the crossing into conformance with current roadway, bridge, pedestrian, and accessibility standards.

Accordingly, the City agrees that continued maintenance is necessary for any bridge structure or that certain existing deficiencies could be repaired individually. The commenter's preference for repair and continued maintenance of the existing bridge is noted; however, the comment does not identify new information requiring revision of the REIR.

LR8-4: The commenter argues that the proposed project has not demonstrated a need to improve roadway safety, traffic operations, or emergency vehicle access because there is little evidence that these are currently significant problems at the bridge. They contend that reported traffic issues are primarily associated with the nearby Druid Monument rather than the bridge itself, and that replacing the bridge could encourage higher vehicle speeds and increase the severity of potential accidents. The commenter

also notes that Caltrans reports indicate the bridge already meets or exceeds load requirements, including those needed for emergency response vehicles.

The commenter is referred to Global Response 1 for a discussion of the broader purpose and objectives of the project and the deficiencies of the existing crossing and Global Response 2 for a discussion on bridge rehabilitation versus replacement.

As discussed in Section 4.10 Transportation and Traffic of the REIR, the transportation analysis does not identify the existing bridge's ability to support the weight of an emergency vehicle as the sole issue affecting emergency access or public safety. Rather, the existing bridge accommodates only one lane of two-way traffic, requiring vehicles traveling in opposing directions to yield before crossing. The REIR explains that the proposed two-lane bridge would allow vehicles traveling in opposite directions to cross simultaneously and would improve emergency response by eliminating the need for fire trucks and other emergency vehicles to wait for opposing vehicles to clear the single-lane bridge. As a byproduct of the bridge replacement, the proposed project would also consolidate the two closely spaced Main Street intersections at Clay Street and Cedar Ravine Road, thereby reducing existing vehicle conflict points and improving circulation through the project area.

The REIR also identifies existing transportation and safety conditions beyond the bridge itself. Section 4.10 Transportation and Traffic of the REIR discusses vehicle conflicts and congestion associated with the closely spaced intersections, uncontrolled pedestrian crossings, and reported vehicle collisions and bicycle and pedestrian near-miss incidents within the project area. Accordingly, Project Objective B is not premised upon a finding that the existing bridge is structurally incapable of carrying emergency vehicles or that severe congestion occurs continuously. Rather, the objective is to improve the operation and safety of the overall crossing and intersection configuration, including access for first responders.

The commenter's concern that widening the bridge could encourage speeding is also acknowledged. As discussed in the applicable global response, the proposed project is not intended to increase vehicle speeds on Clay Street. The replacement bridge and roadway improvements are being designed as an urban, low-speed facility within the constrained downtown environment (25 miles per hour [mph] design speed). The proposed project would retain intersection controls and other geometric and streetscape features that influence driver behavior.

Accordingly, the City acknowledges the commenter's concern regarding potential vehicle speeds but does not agree that the ability of the existing bridge to support emergency-vehicle loads or the absence of continuous congestion demonstrates that the proposed project would fail to meet Objective B. As discussed in Section 4.10 Transportation and Traffic of the REIR of the REIR and the Global Response 1, the proposed project addresses existing operational and access limitations of the crossing and is intended to improve roadway public safety, traffic operations, and first-responder access. The comment does not identify new information requiring revision of the REIR.

LR8-5: The commenter argues that combining pedestrians, bicyclists, wheelchair users, and motor vehicles on the proposed replacement bridge could reduce safety if higher vehicle speeds result. They suggest instead constructing a separate pedestrian and bicycle bridge adjacent to the existing bridge, which they believe would improve safety, preserve the historic bridge, and make better use of available bridge funding.

The commenter is referred to Global Responses 1 and 2 and Chapter 6 Alternatives of the REIR for detailed discussions of the deficiencies of the existing crossing, the feasibility of retaining and rehabilitating the existing bridge, and the alternatives considered in the REIR.

The suggested pedestrian/bicycle bridge would address only a portion of the deficiencies and project objectives identified in Section 3.3 Project Objectives of the REIR. Although a separate structure could potentially provide pedestrian and bicycle access across Hangtown Creek, it would leave the existing Clay Street Bridge in its current single-lane configuration and would not address the bridge's structural, geometric, barrier, emergency access, and roadway deficiencies. It would therefore not, by itself, satisfy Objective A, which seeks to address the safety, functionality, and structural deficiencies of the necessary crossing structure in a manner that meets modern engineering standards for bridge and roadway design, or fully satisfy Objective B, which seeks to improve roadway public safety, traffic operations, and first-responder access.

The City also recognizes that retaining the existing Clay Street Bridge would avoid the significant and unavoidable historical-resource impact associated with its demolition. However, avoidance of one environmental impact does not, by itself, require inclusion or selection of an alternative. Chapter 6 Alternatives of the REIR evaluates a reasonable range of alternatives in accordance with CEQA, including alternatives intended to avoid or substantially lessen significant environmental effects while attaining most of the basic project objectives. The commenter is referred to Chapter 6 for a discussion of the alternatives considered and the reasons other approaches were either evaluated in detail or eliminated from further consideration.

Accordingly, while a separate pedestrian/bicycle bridge could potentially improve nonmotorized access and preserve the existing historic bridge, it would not address the full range of structural, functional, roadway, traffic-operational, and first-responder access deficiencies that the proposed project is intended to address. The City therefore does not agree that construction of a separate pedestrian/bicycle bridge, while retaining the existing bridge in its current configuration for vehicular traffic, would provide an equivalent means of accomplishing the project objectives. The commenter's suggested alternative and preference for preservation of the existing bridge are noted; however, the comment does not identify new information requiring revision of the REIR.

LR8-6: The commenter contends that the proposed project would have greater impacts on adjacent properties than repairing the historic bridge, particularly by affecting the historic character of the area, nearby parking, traffic circulation, and the setting of the Main Street Melters pub. They contend that the project would eliminate the existing

creekside park setting and ADA access, resulting in a loss of community amenities that cannot be justified. The commenter believes City resources would be better spent on maintaining and enhancing the existing area, including creek cleanup, graffiti prevention, and preservation of the historic bridge to support tourism and community character.

The City acknowledges the commenter's concerns. Please refer to Global Response 1 regarding the existing bridge condition, basis for replacement, and project objectives; Global Response 2 regarding rehabilitation of the existing bridge; and Global Response 4 regarding historic character, visual quality, and the architectural treatment of the replacement bridge

As identified in Section 3.3 Project Objectives of the REIR, Objective D is to "minimize impacts to adjacent properties." The objective does not state that all effects to adjacent properties must be avoided. The proposed project was developed within a constrained existing environment that includes Hangtown Creek, Main Street, Cedar Ravine Road, the El Dorado Trail, existing businesses and residences, historical resources, utilities, and other existing infrastructure. Consequently, completely avoiding effects to all adjacent properties while also accomplishing the structural, roadway, pedestrian, bicycle, and public-safety objectives of the project is not practicable. Rather, Objective D requires consideration of those effects and their minimization as part of development of the proposed project.

The REIR evaluates effects associated with the proposed roadway and intersection configuration, including changes to access and parking in the project area. The fact that the proposed project would change existing parking or circulation conditions adjacent to a business does not demonstrate that the project fails to meet Objective D. Access to adjacent businesses and properties would be maintained, although the configuration of access and parking would change as a result of the proposed improvements. As discussed in Section 4.8 Land Use and Planning Threshold D, community members and business owners have speculated that the reconfiguration of the Ivy House parking lot, which would result in the loss of approximately 16 parking spaces, would have negative economic effects because people would have to seek parking elsewhere, which they believe could discourage people from visiting downtown. In 2014, the City acquired a parking lot on Locust Avenue adjacent to the El Dorado Trail for public parking with the purpose of offsetting the loss of spaces at the Ivy House parking lot due to the proposed project. The Locust Avenue parking lot is located approximately 400 feet northeast of the Ivy House parking lot, provides close parking spaces for businesses in the 600-700 block of Main Street, currently provides informal parking (approximately 25 spaces), and reduces parking demand at the Ivy House parking lot. The result of the modifications to the Ivy House parking lot and the availability of the Locust Avenue parking lot would result in a net gain of parking to the area and safe pedestrian access to downtown via the El Dorado Trail.

The City also acknowledges the commenter's concern regarding the creekside viewing area and existing ADA access. The proposed project would modify the existing area adjacent to Hangtown Creek; however, it would also provide new pedestrian facilities

and accessibility improvements as part of the overall project. Please refer to LR1-2, LR5-5 and LR6-5 for a discussion on relocation of the ADA-compliant creekside viewing area. The REIR evaluates the effects of these changes, including effects to landscaping and the visual environment, and identifies applicable mitigation and design measures. The proposed project therefore does not disregard the existing creekside setting or pedestrian accessibility in evaluating impacts to adjacent properties.

The commenter's comparison with repair of the existing bridge also does not account for the full scope of improvements necessary to accomplish the remaining project objectives. As discussed in Global Response 2 and Chapter 6 Alternatives of the REIR, retaining the existing bridge would avoid certain effects associated with replacement but would not address all of the deficiencies of the existing crossing or provide an equivalent means of accomplishing the project objectives. CEQA requires consideration of these environmental tradeoffs through the alternatives analysis; it does not require selection of the alternative that causes the least change to any single adjacent property or environmental resource. Additionally, certain effects to the Ivy House parking lot, creekside viewing area, and adjacent retaining walls would occur even if the bridge were replaced generally along the existing alignment, because widening the bridge and roadway approaches to meet current design standards requires modifications to these adjacent facilities.

With respect to historic ambience, the commenter is referred to Global Response 4. The REIR recognizes the historic character of the project area and the significant effects associated with removal of the existing Clay Street Bridge. The proposed replacement bridge and associated improvements incorporate context-sensitive architectural and landscape treatments intended to integrate the new improvements with the surrounding historic setting.

Accordingly, the City acknowledges that the proposed project would result in changes affecting adjacent properties, parking, circulation, and the existing creekside viewing area. These effects have been considered in the REIR and do not demonstrate that the proposed project fails to meet Objective D. Rather, the proposed project seeks to minimize impacts to adjacent properties while simultaneously addressing the other objectives identified in Section 3.3, including structural and functional deficiencies, roadway and emergency access, pedestrian and bicycle safety, and preservation of the overall historic character of the project area. The commenter's preference for retaining and repairing the existing bridge is noted; however, the comment does not identify new information requiring revision of the REIR.

LR8-7: The commenter requests that the City consider the consequences of destroying the existing bridge and instead create a new pedestrian/trail bridge that would better serve the City. The City acknowledges and appreciates this comment. Please refer to Global Response 7.

7.3.4.17 Comment Letter LR9: Kathi Lishman

Letter Response 9

To: Melissa McConnell, Interim City Engineer
From: Kathi Lishman
Re: Comments & Questions on the Clay Street Bridge Replacement EIR
Date: March, 12, 2024

Thank you for extending the comment period on the entire project. A lot of time has gone by, and it is good to see some changes have been made to the project based on public input.

At the recent Town Hall Workshop on the REIR, it was mentioned that many details will be worked out in the design phase of the project. Which details will that be exactly and how will the public give input on those details?

LR9-1

Main Objective
Page 2 of the Executive Summary states:
"The main objective of the proposed project is to provide a structurally sufficient and safe crossing over Hangtown Creek for all users that meets current safety, structural, and geometric standards, and that will provide adequate, reliable, and safe service for vehicular, pedestrian, and bicycle traffic."

Replacing a 17' wide bridge with a 40' wide bridge is a tremendous impact on the entire area. A new bridge that wide is incompatible with the rest of the area. North of the project is a neighborhood. South of the project is Main St., a main thoroughfare, with two 12' lanes, 2'-4' non standard shoulders (mostly parking spots) and no bike lanes.

Is it possible to mitigate the bridge's impact by eliminating the bike lanes or shoulders on the bridge?
Neither Clay St. nor Main St. have bike lanes. How wide is Clay St. north of the bridge?
Traffic calming measures could be implemented.
Does it have to have a sidewalk on both sides?
Can the roadway from the bridge to Main St. be scaled down?
What additional mitigations will be put into place to create a sense of place and maintain the character of our small historic town?
Can the main objective be met by scaling down the project even more, so as not to create so much disruption to the whole area and have fewer impacts and a better final project?

LR9-2

Clay Street Bridge
According to the REIR the Clay Street Bridge is not aesthetically noteworthy, but it does add to the charm of the area. How will the new bridge add to the charm of the area?

LR9-3

Clay Street
Please clarify what the following sentence means, what it is trying to say, and why it is important to this project.
"The US 50 overcrossing at Clay Street dominates views from Main Street to the north, with mature trees along Hangtown Creek and adjoining US 50 also contributing to the visual mass of the structure.'

LR9-4

Ivy House Parking Lot

Page 68, paragraph 3 of the Executive Summary discusses the Ivy House parking lot. It refers to “a short planter made of stone, that contains sparse landscaping and a mature cork oak tree”. I am not sure what is meant by “sparse landscaping”. Perhaps those comments were made in winter, when the perennials were cut back. At this time it is filled with blooming daffodils, and other plants waiting for spring. It is actually one of the City’s larger planters, in a very visible location, visible by everyone who drives or walks by, and is an important landscape in Placerville. It is the only thing that buffers the parking lot from Main Street and Cedar Ravine, as it follows the curve of the intersection. I delight every time I pass it. The stone planter is older than the cork oak tree, and needs to be preserved. If any part of the planter or landscape is removed, how would any loss be mitigated?

LR9-5

Trees

20 trees are listed to be removed. You can’t really replace mature trees, and replanting 1:1 is not enough mitigation.
What kind and what size are the existing trees?
What size and what kind of trees will be the replacements? The tree species listed in the DEIR need to be revised.
Where will the replacement trees be planted?
How will the creek be shaded?

Mitigation: Trees need to be planted in the parking lot, like the City requires of other developments.
All mitigations need to be onsite or within the project area.

LR9-6

Creekside Park & Key Views

Removing the Creekside Park and moving it to the other side of Hangtown Creek, is not a mitigation, as the new parking lot will not be setback far enough from Hangtown Creek. Hangtown Creek is an asset to our community, and this project could help its potential to be realized by leaving the Creekside Park where it is and building another one on the other side of the creek, as mitigation for the project. This area of Hangtown Creek is great for viewing. The observation area in deep water pools with good fish gravels should be protected and preserved.

There are 5 Key Views listed but there is also a 6th Key View. The 6th Key View is the view from the east side of Hangtown Creek along the trail looking toward the Creekside Park. Walkers along the trail are travelling slow enough to enjoy the existing view. There are more walkers on the trail than bicyclists.

LR9-7

Renderings

Key Views 1-4, showing the Existing and Proposed Views, do not seem to be a good comparison of the two different views. Only Key View 5 seems adequate.

Figure 4.1-6 The two photos should be shown from the same angle.
Figure 4.1-7 Is it possible to have an additional rendering to show the proposed project superimposed over what currently exists?

LR9-8

Conclusion

Community Pride is a volunteer organization for the City of Placerville whose mission is "to improve the grace and charm of Placerville". With the changes this project will bring to the area, every effort needs to be made to mitigate the visual impact of the project. The mature cork oak on the site and the landscaping in the stone planter were originally planted and maintained over 30 years ago by Community Pride volunteers. Community Pride volunteers helped develop the Hangtown Creek Master Plan, and helped apply for the grant that created the Creekside Park. Page 329 of the REIR lists Organizations and Persons Consulted. Community Pride volunteers have a long history with the sight and could be a Consulting Party. LR9-9

Too much is being asked of one small area in town. The visual impact of this project will be massive, and mitigations need to be made so it fits in better with the area. All mitigations need to be onsite. LR9-10

One mitigation would be to utilize a variety of traffic calming principles, allowing you to build a narrower, safer road. Dan Burden Consultants (www.walkable.org) could be used to help design a project that is safe and fits in with the community, while making the area more livable.

"The only possible force that could be motivating the effort to preserve natural areas is the moral conviction that it is right…"

-A. Starker Leopold

7.3.4.18 Response to Comment Letter LR9: Kathi Lishman

LR9-1: The commenter thanks the City for extending the comment period on the project and expresses appreciation of some changes in the project that have occurred. The commenter requests specifically what details will be worked out in the design phase of the project and how the public will provide input on those details.

Please refer to Global Response 6 regarding final design and additional opportunities for public involvement. The fundamental components of the proposed project, including the bridge replacement, roadway alignment, general bridge configuration and dimensions, pedestrian facilities, and hydraulic requirements, have been established and evaluated in the REIR. As the project advances through PS&E, more detailed engineering and design elements will be finalized, including structural details, retaining wall configurations, architectural and aesthetic treatments, landscaping, drainage, utilities, traffic control, fencing, lighting, signing and striping, and other construction details. Specific aesthetic design will be discussed when the City invites the public aesthetics-focused workshop to solicit input on the creekside viewing area, along with other project detailed aesthetics during the PS&E phase of the proposed project. The City appreciates this comment and request for clarification of the design process. Please refer to Global Response 7.

LR9-2: The commenter is concerned that replacing the existing 17-foot-wide bridge with a 40-foot-wide bridge would have substantial visual and community impacts and would be incompatible with the surrounding historic neighborhood and downtown character. They question whether the project could be scaled down by reducing or eliminating features such as bicycle facilities, shoulders, additional roadway width, or one of the sidewalks while still meeting the project's safety objectives. The commenter also requests consideration of additional design measures and mitigations to preserve the area's historic character, reduce disruption, maintain a sense of place, and minimize overall project impacts.

The commenter is referred to Global Response 1 for a discussion of the existing crossing deficiencies, proposed bridge configuration, and relationship of the proposed improvements to the objectives identified in Section 3.3 of the REIR. Please refer to Global Responses 1 and 2 regarding the proposed bridge configuration, pedestrian improvements, and project objectives; Responses LR5-4, LR6-3, and LR6-24 regarding the bridge width, bridge pedestrian improvements, and project objectives; and Responses LR6-28 and LR6-60 regarding the suggestion to provide a sidewalk on only one side of the bridge. Please refer to Response LR6-3 regarding creek “daylighting.” The commenter is also referred to Global Response 4 for additional discussion of the project’s visual compatibility and historic character.

As described in Section 3.4 Project Description of the REIR, the width of the proposed bridge reflects the facilities necessary to provide a safe crossing for vehicular, pedestrian, and bicycle users and to meet applicable design standards. The proposed bridge would replace the existing single-lane crossing with two travel lanes and provide pedestrian facilities on both sides of the bridge. Bicycle travel would be accommodated

as a Class III bicycle facility (i.e., a shared lane with vehicles) rather than through dedicated bicycle lanes. Thus, the proposed bridge width should not be interpreted as providing separate conventional bicycle lanes on the bridge.

The project configuration also reflects the relationship between the bridge and the adjoining roadway system. The bridge cannot be designed independently of the approaches, the El Dorado Trail crossing, the Main Street/Cedar Ravine Road/Clay Street intersection, hydraulic requirements at Hangtown Creek, ADA requirements, bridge barrier requirements, and other applicable roadway and structural standards. As discussed in the REIR and subsequent Type Selection Report, these physical and engineering constraints were considered in developing the proposed crossing.

The City acknowledges the commenter's preference for a narrower bridge and reduced roadway footprint. However, simply eliminating sidewalks, reducing necessary clearances, or otherwise narrowing the structure would not necessarily provide a crossing capable of meeting the applicable structural, geometric, pedestrian, accessibility, and safety requirements or the project objectives. In particular, Objective C specifically calls for improving pedestrian and bicyclist access and safety. Eliminating facilities intended to accommodate these users would therefore conflict with one of the purposes of the proposed project.

With respect to the commenter's concern regarding the scale and historic character of the replacement bridge, the objective of preserving and retaining the existing overall historic character has also been incorporated into project development. As discussed in Section 4.1 Aesthetics and Section 4.4 Cultural Resources of the REIR, the project is located within a visually and historically sensitive portion of downtown Placerville. The proposed bridge therefore incorporates context-sensitive architectural treatment, and the subsequent Type Selection Report identifies additional opportunities for architectural formliners, staining, bridge railing treatments, and treatments to the abutments, wingwalls, and retaining walls. These architectural details will continue to be refined during the PS&E phase consistent with the project evaluated in the REIR.

Accordingly, the proposed bridge width reflects the combined requirements of providing two-way vehicular passage, pedestrian and bicycle accommodation, accessibility, bridge safety features, hydraulic performance, and connection to the adjoining roadway system as required by design standards and the approved project funding. Although certain design details will continue to be refined during PS&E, reducing the project footprint cannot occur in a manner that would compromise applicable design and safety requirements or the fundamental project objectives. No revision to the REIR is necessary in response to this comment.

LR9-3: The commenter references a portion of the REIR that states the Clay Street Bridge is not aesthetically noteworthy but the commenter contends that it does add charm to the area. The commenter asks how the new bridge will add to the charm of the area.

In REIR Section 4.1 Aesthetics, the statement that the bridge is "*n*ot unique or aesthetically noteworthy" appears in the context of the aesthetics analysis, where the

bridge is described as providing visual interest and contributing to the character of the area, but not being visually distinctive enough to be considered a major scenic or aesthetic resource in its own right. This analysis evaluates whether the bridge constitutes a visually distinctive feature within the existing visual environment and whether its removal under the proposed project would substantially degrade visual quality as defined under CEQA.

The terms “unique” and “aesthetically noteworthy” are used in the aesthetic analysis of transportation facilities based on guidance from the Federal Highway Administration (FHWA) Visual Impact Assessment guidance and Caltrans. A resource is considered unique and aesthetically noteworthy when it constitutes a distinctive element of the visual landscape and possesses visual qualities that contribute substantially to the scenic character, sense of place, and view appreciation of the area. Although the bridge is recognized as a community feature to some, its visual character is that of a relatively simple utilitarian bridge that is compatible with the surrounding historic setting rather than architecturally distinctive or dominant. As analyzed in Section 4.1 Aesthetics of the REIR, the features of the existing bridge do not meet the specific definitions of uniqueness nor aesthetic noteworthiness.

The REIR separately recognizes that the bridge has historic significance and evaluates it under the Section 4.4 Cultural Resources, where impacts to the bridge are identified as significant and unavoidable despite mitigation measure implementation. The REIR recognizes the historic character of the project area and the significant effects associated with removal of the existing Clay Street Bridge. With respect to historic ambience, the commenter is referred to Global Response 4. The proposed replacement bridge and associated improvements incorporate context-sensitive architectural and landscape treatments intended to integrate the new improvements with the surrounding historic setting. No revision to the REIR is necessary in response to this comment.

LR9-4: The commenter asks for clarification on the meaning of the following sentence and why it is important as part of the REIR: “The US 50 overcrossing at Clay Street dominates views from Main Street to the north, with mature trees along Hangtown Creek and adjoining US 50 also contributing to the visual mass of the structure.”

This specific sentence is provided in Section 4.1.2.2 Local Character of the REIR and provides context of the existing visual setting in the project area. No revision to the REIR is necessary in response to this comment.

LR9-5: The commenter disagrees with the REIR’s characterization of the Ivy House parking lot landscaping as “sparse,” noting that the stone planter contains seasonal plantings, serves as an important visual amenity, and provides a buffer between the parking lot and the surrounding streets. They emphasize the historical and community value of both the stone planter and the cork oak tree and request clarification on how any removal or alteration of the planter or associated landscaping would be mitigated.

Please refer to Section 1.4.3 Project Characteristics of the REIR where preservation of the cork oak tree in place and modification of the stone planter is identified as a feature of the proposed project. Please refer to Mitigation Measure AES-1 which requires

implementation of landscape and streetscape concepts to maintain consistency with the Main Street Streetscape Design Development Plan. No revision to the REIR is necessary in response to this comment.

LR9-6: The commenter objects to the proposed removal of 20 trees, arguing that mature trees cannot be adequately replaced through a 1:1 planting ratio and that stronger mitigation is needed. They request additional information on the species, size, and location of both the trees proposed for removal and the replacement trees, and question how shading of Hangtown Creek will be maintained. The commenter recommends that replacement trees be planted within the project area, including the parking lot, and that all tree mitigation occur on-site rather than at off-site locations.

Refer Responses LR1-3, LR1-5 and LR6-14 and to Threshold A discussion in Section 4.3 Biological Resources of the REIR which identifies trees to be removed as part of the riparian corridor or within the montane hardwood-conifer areas and associated mitigation measures.

LR9-7: The commenter contends that relocation of the creekside viewing area is not a mitigation measure and that the parking lot will impede the creek setback. The commenter also requests that a Key View 6 be added to the Aesthetics analysis to show views from the east side of Hangtown Creek along the trail looking toward the creekside park.

The City acknowledges that relocation of the creekside viewing area is a feature of the proposed project and not a mitigation measure. The City acknowledges the importance of Hangtown Creek, the existing vegetation, and opportunities for public views of the creek within the project area. The City recognizes that the existing creekside viewing area and views of Hangtown Creek contribute to the visual character of the project area.

The commentor is referred to Response LR1-4. Although the project would modify the existing creekside viewing area, it would continue to provide public access and opportunities to view Hangtown Creek, including through the proposed creekside viewing area relocation north of Hangtown Creek within the project area. The commenter's recommendations regarding retention of the existing creekside viewing area, provision of an additional viewing area, protection of creek views, and consideration of the additional viewpoint are noted. No revision to the REIR is necessary in response to this comment.

LR9-8: The commenter does not think that Key Views 1 through 4 show good comparisons between the different views and that only Key View 5 is adequate. The commenter suggests that Figure 4.1-6 should be shown at the same angles and that Figure 4.1-7 should include the project overlaying the existing conditions.

Please refer to Global Response 4 for a discussion on visual quality of the proposed project area. Section 4.1 Aesthetics of the REIR provides photographs and visual simulations of representative key views to assist the public and decision-makers in understanding the existing visual setting and the anticipated visual changes associated with implementation of the proposed project. The visual simulations are intended to illustrate the general scale, massing, configuration, and character of the proposed

improvements for purposes of evaluating potential aesthetic impacts under CEQA. They are not intended to provide final architectural or engineering representations of every project component or every available viewpoint.

Please refer to Global Response 6 and a discussion on the final design phase of the proposed project. As the project advances through the PS&E phase, detailed design elements will continue to be refined, including architectural treatments, bridge railing details, retaining wall treatments, landscaping, staining, textures, and other streetscape features. Consequently, preparation of a more detailed rendering at this stage could imply a level of finality regarding these features that has not yet been established.

The City does not consider an additional superimposed rendering necessary to evaluate the project's potential aesthetic effects. The existing-condition photographs, proposed-condition visual simulations, project plans and figures, and analysis presented in Section 4.1 of the REIR provide sufficient information to characterize the existing visual environment, illustrate the anticipated visual change, and support the REIR's conclusions regarding aesthetic impacts. The commenter's request for an additional visualization is noted and may be considered as the design is further developed; however, preparation of an additional rendering is not necessary for purposes of CEQA review, and no revision to the REIR is required in response to this comment.

LR9-9: The commenter suggests that the volunteer organization Community Pride be a consulting party to the project and added to Chapter 8 Organizations and Persons Consulted and requests that visual impacts be mitigated.

The City appreciates the organization's longstanding involvement and knowledge of the project area. Please refer to response LR5-10.

The City recognizes that Community Pride has institutional knowledge of the project area and an interest in its visual and landscape character. The project will continue to advance through the PS&E phase, during which detailed landscape, architectural, aesthetic, and streetscape elements will be further developed. The commenter's request for Community Pride to remain involved and provide input regarding these elements is noted and may be considered as the project proceeds through final design. The comment does not identify a deficiency in the environmental analysis or new information requiring revision of the REIR.

LR9-10: The commenter concludes that the project would result in significant visual impacts and contends that all mitigation needs to occur onsite. The commenter also suggests traffic calming features be implemented as mitigation and suggests a consultant that specializes in walkable communities.

Please refer to Global Response 4 for a discussion on visual and landscaping discussions in the proposed project. Please refer to Responses LR1-3, LR1-5 and LR6-14 for a discussion of replanting mitigation measures.

The City also acknowledges the commenter's recommendation to use traffic calming to reduce roadway width. Increasing vehicle speeds is not an objective of the proposed project. Please refer to Responses LR8-3 and LR9-2 for a discussion of the 25-mph

design speed. As identified in Section 3.3 Project Objectives of the REIR, the project is intended, among other objectives, to improve roadway public safety, traffic operations and first-responder access; improve pedestrian and bicyclist access and safety; minimize impacts to adjacent properties; and preserve and retain the overall historic character of the project area. Traffic-calming concepts may therefore be considered during final design where they are compatible with these objectives and applicable engineering and safety requirements.

The proposed bridge and roadway must provide adequate space for two-way vehicular travel, pedestrian and bicycle accommodation, ADA-accessible facilities, bridge barriers, emergency vehicles, and connections to the adjoining roadway system while satisfying applicable structural, geometric, hydraulic, and safety requirements. Traffic-calming measures therefore cannot be used to reduce the bridge or roadway width below that necessary to safely accommodate the facilities and functions required by the project.

Finally, the commenter's recommendation that the City retain Dan Burden Consultants is noted. Selection of a particular consultant is not an environmental mitigation requirement identified in the REIR and is not necessary to establish the adequacy of the environmental analysis under CEQA. Please refer to Global Response 7.

7.3.4.19 Comment Letter LR10: Susan Rodman

Letter Response 10

Comments on the recirculated Clay St. Bridge Replacement EiR
Submitted by Susan A. Rodman, 3187 Big Cut Road, Placerville
10 March 2024

After review of this recirculated EIR, I have the following comments.

I support this project, it is badly needed to resolve several issues for emergency access and evacuation as well as ordinary traffic in the neighborhood area. The existing bridge is inadequate and shows major deterioration. This is a well-designed solution. LR10-1

However, as with the original draft EIR, the major flaw is the inadequate analysis and disclosure for Cedar Ravine Creek. I hope this oversight will be corrected in the Final EIR. My comments are referenced to the page numbers in the recirculated EIR, and if there are questions, I can be reached by e-mail at s.rodmantQsbcolobal.net or by phone at 530-621-4325. LR10-2

Clay Street Bridge Replacement Project
Environmental Impact Report

P r o j e c t D e s c r i p t i o n page 55-56

Quote: “The Cedar Ravine culvert outlets to Hangtown Creek and is integral with the south abutment/retaining wall of the existing Clay Street Bridge. Approximately 150 feet of the Cedar Ravine culvert between Main Street and the existing Clay Street Bridge would be replaced or reconstructed due to the proposed parking lot reconstruction and bridge replacement. Additional length of the culvert may also be reconstructed as part of the project through the intersection of Main Street and Cedar Ravine Road and will be determined when the project enters into final design." LR10-3

The Illustration (page 56) of the replacement bridge does not show how or where Cedar Ravine Creek will empty into Hangtown Creek.

On page 160, photo 4.4-1 clearly shows the juxtaposition or the Clay St Bridge and the outfall for Cedar Ravine Creek. Just as clearly, there is no indication of how the proposed bridge project will allow the junction of Cedar Ravine and Hangtown Creeks. LR10-4

Page 56 states: Stream flow in Hangtown Creek would be diverted into pipe(s) through the active construction zone. The diversion would be established in conformance with City and County specifications as well as California Department of Fish and Wildlife (CDFW}, Central Valley Regional Water Quality Control Board (CVRWQCB), U.S. Army Corps of Engineers (USACE), and U.S. Fish and Wildlife Service (USFWS) regulatory requirements. LR10-5

Again, there is NO disdosure as to what diversion would be done for Cedar Ravine Creek.

Page 163 gives a detailed description of the history and construction of the Cedar Ravine Culvert, but it is largely ignored in the rest of this document. It is still an active stream, and must be addressed for impacts and treatments during this project. LR10-6

Mitigation Measure **BIO-2** page **137 and Mitigation** Measure **BIO-3** page 138
For Foothill yellow-legged frog and Western Pond Turtle need to apply to Cedar Ravine Creek as well as Hangtown Creek. LR10-7

Page 218 Begins the Hydrology and Water Quality section, and the description of Cedar Ravine Creek on page 219 is adequate.

However, under Construction on pages 229 and 230, where diversion for Hangtown Creek is disclosed, there is NO corresponding disclosure for any treatments for diversion or anything else to Cedar Ravine Creek. LR10-8

Page 232 under Threshold B, it states “The proposed project would not alter the course of Hangtown Creek or Cedar Ravine, nor would it alter the existing drainage pattern of the site."

This statement is not supported in the document, since the location for Cedar Ravine Creek to empty into Hangtown Creek, as is the current condition, is never shown or stated in this document. LR10-9

Threshold c. page 233

Because the proposed project could increase the rate and/or volume of surface runoff compared to existing conditions, the project has the potential to cause or exacerbate flooding on or off site; however, the Cedar Ravine drainage culvert, which outlets into Hangtown Creek, would be relocated and reconstructed, which would ensure capacity is maintained. LR10-10

REALLY? This is a pretty bold statement, given that how or where the Cedar Ravine drainage culvert reconstruction and location is not disclosed anywhere in this document. The disclosure of how and where the Cedar Ravine culvert is reconstructed and located is absolutely required for this environmental document to be adequate and complete.

7.3.4.20 Response to Comment Letter LR10 Susan Rodman

LR10-1: The commenter supports the proposed project. The City appreciates this comment. Please refer to Global Response 7.

LR10-2: The commenter indicates that the REIR has a major flaw with the inadequate analysis and disclosure for Cedar Ravine Creek.

The City acknowledges the commenter's concern. Cedar Ravine Creek and the existing Cedar Ravine Culvert are addressed in multiple portions of the REIR, including Chapter 3 Project Description; Section 4.3 Biological Resources; Section 4.4 Cultural Resources; and Section 4.9 Hydrology and Water Quality.

As described in Chapter 3 Project Description of the REIR, Cedar Ravine Creek is conveyed through an existing culvert that outlets to Hangtown Creek and is integral with the south abutment/retaining wall of the existing Clay Street Bridge. The REIR identifies reconstruction or replacement of approximately 150 feet of the Cedar Ravine culvert between Main Street and the existing bridge as part of the proposed project, with the potential for an additional portion of the culvert through the Main Street/Cedar Ravine Road intersection to be reconstructed depending upon final design. Thus, modification of the Cedar Ravine culvert is expressly included as a component of the proposed project.

Section 4.9 Hydrology and Water Quality of the REIR, describes Cedar Ravine Creek and evaluates the effects of the proposed project on drainage, flooding, water quality, and the Cedar Ravine Culvert. The REIR recognizes that construction would disturb the area associated with reconstruction of the Cedar Ravine Culvert outlet and approximately 150 feet of the existing culvert. It evaluates the potential for construction-related erosion, sedimentation, dewatering, spills, and other water-quality effects associated with work adjacent to the creeks. The REIR also identifies applicable construction BMPs, dewatering requirements, and regulatory permits intended to protect water quality and aquatic resources during construction.

Under Thresholds B, C, and D in Section 4.9 Hydrology and Water Quality, the REIR further considers whether the proposed project would substantially alter the course of Cedar Ravine Creek or existing drainage patterns and whether project-related increases in runoff could cause or exacerbate flooding. The REIR concludes that the reconstructed Cedar Ravine Culvert would maintain the drainage function and capacity of the existing facility. The purpose of reconstructing the culvert is therefore not to eliminate or substantially redirect Cedar Ravine Creek, but to maintain its drainage connection to Hangtown Creek while accommodating the proposed bridge, roadway, parking lot, and retaining-wall improvements.

Section 4.3 Biological Resources of the REIR separately evaluates potential effects associated with work in and adjacent to aquatic and riparian resources and identifies applicable avoidance, minimization, and mitigation measures and regulatory requirements. The proposed project would also require applicable permits and approvals for work affecting waters and stream resources, including authorization under

Clean Water Act Sections 401 and 404 and a California Fish and Game Code Section 1600–1602 Streambed Alteration Agreement. These regulatory processes will further govern the manner in which construction affecting Cedar Ravine Creek, its culvert outlet, and Hangtown Creek is performed.

The City acknowledges that the REIR does not provide the final engineering configuration of every component of the reconstructed Cedar Ravine culvert or the final construction means and methods for managing Cedar Ravine Creek flows during construction. The commenter is referred to Global Response 6 regarding final design.

With respect to Cedar Ravine Creek, the REIR identifies reconstruction of the Cedar Ravine Culvert as part of the proposed project, describes the approximate extent of the anticipated reconstruction and its relationship to Hangtown Creek and the bridge improvements, and evaluates the reasonably foreseeable hydrologic, water-quality, biological, and construction-related effects associated with that work. The precise culvert configuration, outlet details, construction sequencing, temporary flow-management methods, and similar engineering details may appropriately be developed during PS&E and regulatory permitting, provided that those refinements remain consistent with the project evaluated in the REIR and applicable mitigation measures and permit requirements.

Accordingly, the City does not agree with the commenter's assertion that Cedar Ravine Creek was ignored or omitted from the REIR. The REIR contains sufficient information to identify Cedar Ravine Creek as an existing active drainage feature, disclose the proposed modification of its culvert, and evaluate the reasonably foreseeable environmental effects associated with that work. To the extent the commenter seeks additional detail concerning the final culvert configuration or construction methods, those engineering details will be developed during final design and applicable permitting and will be required to remain consistent with the environmental commitments established in the REIR.

LR10-3: The commenter quotes sentences on pages 55 and 56 of the REIR regarding reconstruction of the Cedar Ravine Culvert. The commenter notes that the illustration on page 56 of the REIR does not show how or where Cedar Ravine Creek empties into Hangtown Creek.

The REIR on page 56 does not include an illustration. Please refer to Global Response 7.

LR10-4: The commenter indicates that photo 4.4-1 on page 160 of the REIR shows the juxtaposition of the Clay Street Bridge and Outfall for Cedar Ravine Creek but there is no indication of how the bridge would allow the junction of Cedar Ravine and Hangtown Creek.

The specific photograph the commenter references is provided in the REIR in Section 4.4 Cultural Resources and depicts the existing conditions of the bridge in relation to its consideration as a potential historic resource. This photograph is not intended to illustrate the new bridge or components (i.e., Cedar Ravine outlet) that would be implemented as part of the proposed project.

The precise configuration and appearance of the reconstructed Cedar Ravine Culvert outlet will be developed as the project advances through PS&E and applicable regulatory permitting. Please refer to Global Response 6 regarding final design. The absence of this final engineering detail from a conceptual rendering in the REIR does not mean that the feature has been omitted from the proposed project or from the environmental analysis. Rather, the REIR evaluates the reasonably foreseeable physical effects associated with reconstruction of the culvert and outlet based on the level of design available during environmental review. Please refer to the discussion in Response LR10-2.

The culvert reconstruction and outlet work are disclosed and analyzed in the REIR, while the precise engineering configuration and appearance of the outlet will be refined during PS&E and permitting. No revision to the REIR is necessary in response to this comment.

LR10-5: The commenter references a discussion about diversion of stream flow in Hangtown Creek on page 56 of the REIR and notes there is no disclosure as to what diversion would be done for Cedar Ravine Creek.

Please refer to REIR Section 4.3 Biological Resources, first sentence under Threshold C discussion that states “Stream flow in Hangtown Creek and Cedar Ravine would be diverted through the active construction zone”. Additionally, as discussed in Section 4.9 Hydrology and Water Quality of the REIR, approximately 150 feet of the Cedar Ravine Culvert between Main Street and the existing Clay Street Bridge would be replaced or reconstructed as part of the proposed project. The REIR recognizes that reconstruction of the Cedar Ravine Culvert outlet would temporarily disturb the stream bank of Hangtown Creek and evaluates the potential for erosion, sedimentation, dewatering, and associated water-quality effects resulting from construction.

The REIR provides a more detailed description of the temporary diversion proposed for Hangtown Creek, including use of pipes, diversion dams, sandbags, and plastic sheeting to convey streamflow around the active construction area. That discussion should not be interpreted as establishing that Cedar Ravine Creek would necessarily use the identical diversion configuration. The specific means and methods for managing Cedar Ravine Creek flows during reconstruction of the culvert have not yet been finalized and would be developed during PS&E and in coordination with the applicable regulatory agencies.

The specific methods for temporary management of Cedar Ravine Creek would depend on final design, anticipated flow conditions during construction, construction sequencing, and requirements imposed through applicable permits. These details would be incorporated into the construction plans and specifications and would be required to comply with applicable water-quality and resource-agency requirements.

As discussed in LR10-2, the REIR identifies the regulatory framework applicable to work affecting the creek system, including Clean Water Act Section 404 authorization, Clean Water Act Section 401 Water Quality Certification, and a California Fish and Game Code Section 1600–1602 Streambed Alteration Agreement. These approvals provide

an additional mechanism for establishing construction requirements necessary to protect water quality and aquatic resources during work associated with the culvert and its outlet.

CEQA does not require the precise construction means and methods for temporary flow diversion to be determined before completion of environmental review. Please refer to Global Response 6 for detail on the final design process and specific CEQA Guidelines related to project design.

Accordingly, while the REIR does not establish the final means and methods for temporary diversion or management of Cedar Ravine Creek, it identifies the culvert reconstruction, evaluates the reasonably foreseeable effects associated with that work, and establishes the environmental and regulatory requirements that will govern construction. No revision to the REIR is necessary in response to this comment.

LR10-6: The commenter references a detailed description of the history and construction of Cedar Ravine Culvert on page 163 of the REIR but notes that the facility must be addressed for impacts and treatments during the project.

Please refer to Response LR10-2 through LR10-5. No revision to the REIR is necessary in response to this comment.

LR10-7: The commenter states that Mitigation Measures BIO-2 and BIO-3 need to apply to Cedar Ravine Creek for foothill yellow-legged frog and western pond turtle.

Please refer to Response LR10-2 that references the REIR as concluding that habitat for both of these species does not occur in the project area, specific to Cedar Ravine Creek/Culvert as the facility in the project site is composed of concrete. No revision to the REIR is necessary in response to this comment.

LR10-8: The commenter references page 219 of the REIR as adequately describing Cedar Ravine Creek but is concerned that diversion discussion for Cedar Ravine Creek is not included on pages 229 and 230 of the REIR.

Please refer to Response LR10-5. No revision to the REIR is necessary in response to this comment.

LR10-9: The commenter references page 232 Threshold B of the REIR which states that the project would not alter the course or drainage pattern of Hangtown Creek or Cedar Ravine and the commenter asserts that this is not adequately supported because the existing outfall is not shown or stated in the REIR.

The conclusion under Threshold B concerns whether the proposed project would substantially alter the course of a stream or drainage pattern in a manner that would result in a significant environmental effect. Reconstruction of the existing Cedar Ravine Culvert and refinement of the precise outlet configuration do not, by themselves, constitute a substantial alteration of the course of Cedar Ravine Creek. The fundamental drainage relationship would be maintained: Cedar Ravine would continue to be conveyed through a drainage facility to its receiving water, Hangtown Creek.

Accordingly, the absence of the identification of a final engineered outlet in the REIR does not invalidate the Threshold B analysis. The REIR identifies the existing and proposed drainage relationship between Cedar Ravine and Hangtown Creek, discloses that the Cedar Ravine Culvert would be reconstructed as part of the proposed project, and evaluates the reasonably foreseeable hydrologic and water quality effects of that work. Final design will establish the precise outlet configuration while maintaining the drainage function and connection of Cedar Ravine to Hangtown Creek and complying with applicable hydraulic, environmental, and permitting requirements. Therefore, the commenter's concern does not alter the REIR's conclusion under Threshold B that the proposed project would not substantially alter the course of Cedar Ravine or the existing drainage pattern in a manner resulting in a significant environmental effect.

LR10-10: The commenter questions the conclusion under Threshold C in Section 4.9 Hydrology and Water Quality of the REIR that reconstruction or relocation of the Cedar Ravine Culvert would maintain drainage capacity and would not cause or exacerbate flooding. Specifically, the commenter contends that this conclusion cannot be supported because the precise configuration and location of the reconstructed culvert were not established in the REIR.

The City acknowledges the commenter's concern. Since preparation of the REIR, the project design has advanced and a Preliminary Hydraulic Study and Scour Analysis was completed in October 2025 to further evaluate the hydraulic characteristics of Hangtown Creek and Cedar Ravine and to provide guidance for final design. Information from this study was used to update Section 4.9 Hydrology and Water Quality of the REIR (see Section 7.2 Revisions to the REIR, above). The Preliminary Hydraulic Study provides substantially more detailed information regarding the existing Cedar Ravine drainage system and the analysis expressly accounts for the effect of Hangtown Creek water-surface elevations on the hydraulic capacity of the Cedar Ravine Culvert.

Based on the current design, Cedar Ravine Creek would continue to discharge to Hangtown Creek in the same general location. The Preliminary Hydraulic Study states that the Cedar Ravine outlet would not be incorporated into the new bridge. Instead, the existing Cedar Ravine Culvert would be extended to daylight through the proposed retaining wall near the southwestern side of the proposed bridge. A portion of the culvert beneath Main Street would be replaced because of shallow cover associated with the proposed roadway, but would not be upsized, and a new outfall structure would be constructed to match the conditions of the existing outfall.

The updated hydraulic analysis also provides additional context regarding the existing flooding condition referenced by the commenter. The study determined that Cedar Ravine Culvert capacity is influenced by the water-surface elevation in Hangtown Creek. Under low-flow conditions in Hangtown Creek, the existing Cedar Ravine Culvert has an estimated capacity of approximately 317 cubic feet/second (cfs). During the 50-year event, backwater conditions in Hangtown Creek reduce the estimated culvert capacity to approximately 269 cfs. The modeled Cedar Ravine peak flows are 286 cfs during the 50-year event and 325 cfs during the 100-year event; therefore, the study concludes that the existing Cedar Ravine Culvert is presently inadequate to convey the

50- and 100-year peak flows and that culvert overflow and roadway flooding can be expected during major flood events.

This information is important to the Threshold C analysis because it demonstrates that the potential for Cedar Ravine Culvert overflow during major storm events is an existing hydraulic limitation rather than a new flooding condition created by the proposed project. The current design does not propose to reduce the size of the Cedar Ravine Culvert or alter its fundamental drainage function. Rather, Cedar Ravine would continue to discharge to Hangtown Creek, and the new outlet would be constructed to match the hydraulic conditions of the existing outlet.

The Preliminary Hydraulic Study also demonstrates that the proposed bridge itself would improve hydraulic conveyance within Hangtown Creek. Modeling of the proposed bridge determined that water-surface elevations upstream of the bridge would be lower under proposed conditions and that conveyance through the bridge would improve. The proposed bridge is designed to provide approximately 2.29 feet of clearance above the modeled 50-year water surface and approximately 1.53 feet above the modeled 100-year water surface. The additional freeboard also provides resilience against debris associated with historical flooding conditions.

Therefore, the discussion under Threshold C has been changed to the following for clarification:

Because the proposed project could increase the rate and/or volume of surface runoff compared to existing conditions, the project has the potential to cause or exacerbate flooding on or off site; however, the Cedar Ravine drainage culvert, which outlets into Hangtown Creek, would be reconstructed without reducing its existing hydraulic capacity or altering its fundamental drainage function. The existing potential for culvert surcharge and roadway flooding during major storm events is attributable to the existing culvert capacity and Hangtown Creek backwater conditions and would not be created or exacerbated by the proposed project.

Accordingly, the subsequent Preliminary Hydraulic Study provides additional engineering support for the REIR's conclusion under Threshold C. The study confirms the existing hydraulic limitations of the Cedar Ravine Culvert, evaluates its capacity under varying Hangtown Creek water-surface conditions, establishes the current design approach for maintaining Cedar Ravine's existing drainage connection to Hangtown Creek, and requires further hydraulic analysis if the design is changed. The updated analysis does not indicate that the proposed project would create a new Cedar Ravine flooding condition or exacerbate the existing capacity limitation. Rather, it provides additional technical support for the conclusion that the project can be designed to maintain the existing drainage function while the replacement bridge improves hydraulic conveyance within Hangtown Creek. No revision to the REIR's significance conclusion is necessary in response to this comment.

7.3.4.21 Comment Letter LR11: Michael Drobesh

Letter Response 11

REC
APR 15 202
CITY OF PLACERVILLE
ADMINISTRATION DEPT.

City of Placewille. Axn:

Melisa McConnell, Interim City Engineer

3101 Center Street, Placerville, Œ 95667

RE: CŒY STREET BRIDGE REPŒCEMENT PROJECT

(25CO117)

DRAFT REIR

Public Comment by Michael Drobesh

Thank you for this opportunity to comment on the Clay Street bridge replacement and realignment project Draft REIR. And thank you for addressing these concerns, and for making these proper revisions.

LR11-1

Here are proffered detailed ways to help mitigate or reduce negative project impacts to a more acceptable public level, and hopefully when the dust settles, we end up with a project fitting and suitable for inclusion in our Historic Downtown Placerville District, not some fake Disneyland garbage. ;)

- Aesthetic & Cultural Mitigation:

The new bridge must mimic the architecture of the existing one at Clay Street, making it look like a classic 1920's-30's concrete bridge. The railing style is most critical, an exact copy is not necessary, just get the period correct look. After all, you are going to be killing a perfectly functional and multiple floods surviving 100-year-old bridge. So, show some respect and make the new look old. Crash rated concrete balustrades with vertical relief columns could easily be formed, as other modern bridges needing to fit historical districts have done, and as Caltrans' Context Sensitive Solutions Policy permits. Whether the railings are solid, or allow air flow, is for the engineers to calculate. Light posts on all four parapet corners would be appropriate and desirable if they matched the existing green light poles nearby and were suitably scaled. These details would heavily mitigate the "unavoidable" negative impact of the old bridge demolition. And copying the new bridges at Canal, Spring & Bedford would be inappropriate in this historic area and would INCREASE negative project impacts namely reducing the eligibility of the Historic Downtown Placerville District.

LR11-2

- '" Aesthetic, Cultural, Traffic, Parking & Growth Inducing Mitigation:

Reduce the width of the new bridge to bare legal minimums, then ask for a waiver to reduce it further. Jurisdictions pay big money for traffic calming safety measures. And the existing narrow bridge does this extremely well. The proposed project will be combining pedestrians, bicycles and moving vehicles all within the same close real estate. Therefore, it is essential to reduce vehicle speeds, and a wide-open

LR11-3

bridge will do the opposite. Adding rumble bumps in the roadway would have a negative impact to patients riding in an ambulance (ask me how I know). The speed limit on Clay is likely to be 25 mph, but visually narrowing a roadway psychologically reduces drivers speeds naturally. Narrow the bridge by eliminating dedicated bike lanes and using shared class 3 lanes. Afterall, what good is only 150 feet of dedicated class 2 lanes, when all of the nearby roads are class 3 shared lanes. So, keep road/bike lane uniformity. Also narrow the Clay Street South of bridge roadway portion with bare minimum width shared lanes and sidewalks, likely increasing parking & flow in the new parking lots. And increasing space for landscaping to mitigate some of the lost creek park vegetation. The city forces private parking lots to have SOP solar noon tree shading, why shouldn't the city meet its own requirements, so add parking lot trees. Do NOT just pay funds to a tree back for lost vegetation mitigation, we demand replaced greenery right here. RE Figure 3.4-1, What is that yellow striped section on Clay St at the intersection for, a future left turn lane? Use it or lose it, we need as much parking lot & tree space as possible. And shift southbound Clay St over that striped area, to facilitate making that acute corner right hand turn onto Main St, which puts the Cork Oak and the new Druids Monument location at risk from big rigs swinging wide for their trailer.

LR11-3

- Aesthetic & Cultural Mitigation:

All truncated domes to be deep rust red to match the Historic Downtown. No modern flashing crossing beacons. If flashing beacons are required, they should be vintage looking and similar to our green light poles. And minimize sign pollution & disturbing modern colors, like the new sidewalk crossings in El Dorado & Diamond Springs, which are absolutely disgusting over the top with duplicate signage and neon colors that are not suited for our Historic District. This applies as well to the new trend of green road stripping for bicycles, stop with the overwhelming visual pollution. Keep it simple. Also add conduits for future four-way intersection signalization, because we do not want to tear up good infrastructure later, if we could have simply planned ahead.

LR11-4

- Aesthetic, Cultural, Traffic & Parking Mitigation:

Seriously consider other locations and safety for the Druids Monument, within the immediate project vicinity. Plus, possible off-site storage procedures during construction and who will pay to replace it if damaged during construction. Please spell this all out, asa Druidof Grove1,I deserve to know. Ifit mustmoveforsafety's sake, the current shown position in Figure 3.4-1 also places it in the path of travel and should move a few feet East until the base just meets the crosswalk. A new raised protective footing and4 to 8 crash bollards(with obelisk tops and night lights shining onto the Monument on any new bollards please) surrounding it would help minimize vehicular damage. But note, in this location, a big red stop sign right next to it will end up in every future photo, reducing its historical status. There are other locations within a stone's throw that do not appear to have been analyzed.Starting from nearest first: 1) About 15 feet to the South, toward where the dentist sign is. The city could place it on public property where the current right-hand yield turn lane is and realign this turn lane North of the new Monument location, allowing for proper vehicle turning radius and installing crash bollards at all four corners. The city could also enter into an agreement with the dentist sign owner to relocate their sign either Westward up Main St to the corner of their building, or South down Cedar Ravine. Either way, the Monument and the dentist sign should be separated by 30-4Ofeet, or just choose another location. Also note that this spot might place the Monument over the culvert, which should be avoided. 2) The unused Southwest corner of the East parking lot, just inside the sidewalk, with four crash bollards at each corner. And probably no need for an elevated footing. This would give it excellent visibility from almost every spot in the project footprint, and superior protection from vehicles. This is growing as my favorite location. It is probably Sofeet North of the current location, which could also mean moved once. As the parking lot corner is built, move the Monument, then continue working on the intersection. 3) The unused West cornerof the Western parkinglot, along Main St about where the Ivy House rock plaque is. This location offers protection from vehicles, with fourbollards and no raised footing. But it is amore obscured location for spotting at a distance, due to many nearby buildings. 4) In the center ofa four-way roundabout. F a modern roundabout in our Historic District. Period.

LR11-5

- ” Aesthetic, Cultural, Urban Decay & Consistency with Local Plans & Policies Mitigation:

Install seismic sensors on Soda Works building with a direct alarm to the on-site project foreman and/orcitystaff. To alert to stop, if(pre-determinedby engineers) vibrations are at dangerous levels to this historic unreinforced masonry treasure. LR11-6

- Aesthetic, Cultural, Traffic, Parking, Urban Decay, Growth Inducing and Consistency with Local Plans & Policies Mitigation:

Adding a roundabout at this historical intersection is NOT the “environmentally superior alternative” as is wrongly claimed in the REIR, it is the exact opposite. And precisely why Measure K was overwhelmingly passed by the voters in 2014, and relief from the Court was pursued. Adding one here would directly and SIGNIFICANTLY INCREASE negative project impacts in the other categories listed above. A modern roundabout in this historic area would significantly reduce the eligibility of creating an official Historic Downtown Placerville District. It would cause driver confusion as being the only intersection of its type within the city, increasing accidents amongst vehicles pedestrians & bicycles, and increasing the risk of damage to the Druids Monument which would now be placed directly in the middle of the intersection. Parking and green space would be significantly reduced. Emergency response times would increase as drivers stopped in the roundabout confused about what to do, blocking emergency vehicles. And if the roundabout became a two lane to mitigate this negative impact, then there are increased negative impacts again on parking, green space, aesthetics & culture, traffic, growth inducing, etc. All a vicious circle, if you will. Claims are made that roundabouts offer lower operating GHG emissions, but that is not the most important category for this location. Protecting the areas historical Aesthetics and Culture are paramount and supersede all other considerations. Public funds and precious staff time would be required to place a ballot measure asking voters for permission to build a roundabouthere, where the voters SPECIFICALLY said not to, thereby risking the entire project and further wasting time and treasure. That is unacceptable. For these reasons, to mitigate cumulative negative impacts, a roundabout must not be allowed in this historic location. LR11-7

- Aesthetic, Cultural, Traffic, Parking, Growth Inducing and Consistency with Local Plans & Policies Mitigation:

Seriously analyze a Project alternative that keeps the existing Clay St bridge and South roadway towards Main St as a dedicated pedestrian and bicycle path. And build a new bridge upstream for vehicles only. Which could be quite narrow, still realign Clay St as a four-way stop intersection, freeing up more parking and landscape space, increase safety between pedestrians & bikes mingling with now slower vehicles intersecting the Trail, and above all, it removes the "unavoidable" negative impact of demolishing the Old Clay Street Bridge. We could call them the Siamese bridges. This plan would also allow the Old Clay St Bridge to be kept in service while a new bridge is built upstream, keeping emergency access open and reducing construction GHG by allowing workers to cross the creek directly instead of driving around to Locust St. Please seriously analyze this alternative and show your math on how there is no chance of it all fitting together. Otherwise, the city might yet again have a flawed EIR. LR11-8

In closing, Thank You for the opportunity to comment on this proposed project and offer up mitigation measures to reduce negative impacts. I request that you postpone the approval of this incomplete project analysis until you, your staff and the public have come to a consensus on the scope, applications, options and implications of this project proposal.

LR11-9

I take my privacy very seriously, hence no contact info on these public pages. The City has my mailing address and phone number on file for utility billing, if any City staff or project consultants need to follow up for clarification of my points herein. God speed to creating a project worthy of inclusion within our eligible Historic Downtown Main Street District.

Thank you in advance, Michael Drobesh

7.3.4.22 Response to Comment Letter LR11 Michael Drobesh

LR11-1: The commenter relays appreciation for being able to comment on the REIR and provides suggested mitigation which the commenter believes would reduce impacts to the Downtown Historic District. The City appreciates the comments. Please refer to Global Responses 4 and 5 regarding the project's effects on historic character and historical resources and the design and mitigation measures identified to address those effects. The commenter's specific recommendations are addressed in the responses below**.** Please refer to Global Response 7.

LR11-2: The commenter recommends that the new bridge be designed to reflect the historic character of the existing Clay Street Bridge, particularly through period-appropriate railings, architectural details, and decorative lighting that evoke a 1920s-1930s concrete bridge. They advocate that because the project will replace a century-old bridge that has survived multiple floods, the new structure should honor its legacy by incorporating context-sensitive, historically compatible design features permitted under Caltrans policies. The commenter also opposes using the design of newer bridges elsewhere, stating that such an approach would be inappropriate in the historic downtown area and could increase adverse impacts to the Historic Downtown Placerville District's eligibility and character.

The commenter is referred to Global Response 4 for a detailed discussion of the historic and visual setting of the project area, the effects associated with removal of the existing bridge, and the architectural and aesthetic treatments that may be incorporated into the replacement structure.

The City recognizes that the proposed project is located in a visually and historically sensitive portion of downtown Placerville, as discussed in Section 4.1 Aesthetics and Section 4.4 Cultural Resources of the REIR. The design of the replacement bridge is an important consideration in maintaining compatibility with the surrounding setting. As discussed in Global Response 4 as well as Mitigation Measure AES-1 in the REIR, the proposed project does not require or assume that the replacement bridge would be constructed as an untreated modern structure without consideration of its historic context.

The commenter's recommendations regarding concrete balustrades, railing design, lighting, and other period-appropriate architectural features concern the detailed architectural treatment of the replacement bridge. These features are appropriately developed during the PS&E phase, when the structural design, bridge barriers, architectural treatments, materials, colors, textures, lighting, and related details can be coordinated. The final design must also satisfy applicable structural, safety, accessibility, and bridge-barrier requirements. Please refer to Global Response 6 regarding final design.

The City agrees that context-sensitive design is appropriate for this location. However, compatibility with the historic setting does not necessarily require an exact reproduction of the existing bridge or construction of a false historic replica. Rather, architectural treatments may draw upon the scale, proportions, materials, forms, and other

characteristics of the existing bridge and surrounding historic environment while allowing the replacement structure to meet contemporary structural and safety requirements. The commenter's specific suggestions regarding crash-rated concrete balustrades, vertical relief elements, and historically compatible lighting are therefore appropriate considerations for evaluation during final design.

The City appreciates the commenter's detailed design recommendations. The recommendations regarding bridge railings, concrete balustrades, lighting, and other context-sensitive architectural treatments will be considered as the project proceeds through PS&E, subject to applicable engineering and safety requirements and consistency with the project evaluated in the REIR. No revision to the REIR is necessary in response to this comment.

LR11-3: The commenter recommends reducing the width of the proposed bridge and roadway as a traffic-calming measure, eliminating dedicated bicycle lanes in favor of Class III shared bicycle facilities, and narrowing Clay Street south of the bridge. The commenter states that these changes could provide additional space for parking and landscaping and recommends that replacement vegetation be provided within the project area. The commenter also questions the purpose of the striped area shown on Figure 3.4-1 near the intersection and recommends modifying the southbound Clay Street alignment to facilitate right-turn movements onto Main Street and reduce potential conflicts with the Cork Oak and relocated Druid Monument.

The commenter is referred to Global Response 1 for a discussion of the proposed bridge configuration and the relationship of the proposed improvements to the project objectives identified in Section 3.3 Project Objectives of the REIR. The commenter is also referred to Global Response 3 for a discussion of the proposed roadway alignment and intersection configuration. To the extent the comment concerns compatibility of the proposed improvements and landscaping with the surrounding historic setting, the commenter is referred to Global Response 4. Concerns regarding the location and protection of the Druid Monument are addressed in Global Response 5.

The City acknowledges the commenter's recommendation to use roadway width as a traffic-calming measure. Reducing vehicle speeds is not an objective of the proposed project, please refer to LR8-4 and LR9-2. However, the bridge and roadway cross-section must balance multiple project objectives and design requirements, including provision of two-way vehicular travel, pedestrian and bicycle access, first-responder access, ADA-compliant pedestrian facilities, bridge barriers, appropriate vehicle turning movements, and applicable structural, roadway, hydraulic, and safety requirements. Accordingly, the bridge and roadway cannot be narrowed solely for purposes of traffic calming or maximizing parking and landscaping if doing so would conflict with these requirements.

The commenter also recommends eliminating dedicated bicycle lanes in favor of Class III shared bicycle facilities. As described in the REIR, the proposed project does not include dedicated Class II bicycle lanes across the bridge. Bicycle travel would be accommodated within the roadway as a Class III shared facility. Therefore, the

proposed project already generally incorporates the type of bicycle accommodation recommended by the commenter.

The commenter's recommendations regarding additional parking, landscaping, and onsite tree replacement are also noted. Please refer to Responses LR8-6 for a discussion on parking and Global Response 6 for discussion on landscaping. The project area is physically constrained by Hangtown Creek, Main Street, Cedar Ravine Road, existing development, parking areas, utilities, historic resources, pedestrian facilities, and other infrastructure. The final allocation of space among roadway, parking, pedestrian, drainage, landscape, and other project features will continue to be refined during the PS&E phase. Landscape design and replacement planting will likewise be developed in greater detail during PS&E consistent with the project evaluated in the REIR and applicable mitigation requirements.

Figure 3.4-1 of the REIR depicts the proposed project at the level of design available for environmental review and is not a final signing, striping, or roadway construction plan. The figure has been updated with current engineering design. The REIR identifies the rendering as conceptual and for illustrative purposes only. The yellow hatched area represents a non-traversable painted median/channelizing island to maintain acceptable vehicle turning movements and provide proper alignment through the intersection. Detailed pavement markings, lane geometry, curb locations, turning movements, signing, and related roadway features will be finalized during PS&E.

The City also acknowledges the commenter's concern that large vehicles turning onto Main Street could affect the cork oak or the proposed location of the Druid Monument. Turning movements of all vehicle types were considered during development of the 35-percent design plans. The preliminary roadway and intersection geometry shown in the REIR reflects this engineering evaluation and was developed to provide adequate clearance for the turning movements through the proposed intersection and roadway configuration. As the proposed project advances through PS&E, turning movements will continue to be evaluated and the roadway geometry refined, as necessary, based on final design criteria. Any such refinements will be required to remain consistent with the project evaluated in the REIR and applicable roadway and safety standards.

Several of the commenter's recommendations concern detailed engineering and landscape decisions that have not yet been finalized and can appropriately be considered during PS&E. Please refer to Global Response 6 regarding final design; such refinements must remain consistent with the project analyzed in the REIR, applicable mitigation measures, project objectives, and engineering and safety requirements. The commenter's recommendations are noted; however, no new information was identified requiring revision of the REIR.

LR11-4: The commenter requests that pedestrian accessibility features and traffic control elements be designed to complement the historic character of downtown, including using deep rust-red truncated domes, historically styled flashing beacons if required, and minimizing visually intrusive signage, bright colors, and bicycle pavement markings. They express concern that excessive modern traffic control devices create

visual clutter that is inappropriate for the Historic Downtown District and advocate for a simpler, more aesthetically compatible approach. The commenter also recommends installing conduits for potential future four-way traffic signals during construction to avoid costly infrastructure disruptions later and support long-term planning.

The City appreciates this comment. Refer to Global Response 6. No revision to the REIR is necessary in response to this comment.

LR11-5: The commenter requests a detailed plan for protecting, relocating, storing, and potentially replacing the Druid Monument during construction, stating that stakeholders should be fully informed about these procedures and responsibilities. They argue that if relocation is necessary, the currently proposed location should be adjusted and enhanced with protective features such as a raised footing, crash bollards, and lighting, while also avoiding visual conflicts with nearby traffic signs. The commenter believes alternative locations closer to the project area were not adequately evaluated and identifies several preferred sites that could provide better visibility, protection from vehicles, and fewer aesthetic concerns. Among the alternatives, the commenter favors placement in the southwest corner of the eastern parking lot because it would offer excellent visibility, strong protection, and potentially allow the monument to be moved only once during construction.

The commenter is referred to Global Response 5 for a detailed discussion of the history and significance of the Druid Monument, anticipated project impacts, Mitigation Measure CUL-2, and the Section 106 consultation process. To the extent the comment concerns the relationship between the monument and the Clay Street realignment, the commenter is also referred to Global Response 3. Visual compatibility of the monument and surrounding project improvements is addressed generally in Global Response 4.

As discussed in Section 4.4 Cultural Resources of the REIR, the proposed project would relocate the Druid Monument approximately 45 feet west within the Main Street/Cedar Ravine Road intersection. The proposed location is not under further consideration as a design concept. The placement has already been confirmed through coordination with the UAOD, Caltrans, and the Office of Historic Preservation as part of the project's historic-resource review and Section 106 process.

Maintaining the Druid Monument within the intersection is an important component of the selected relocation approach because it preserves, to the extent feasible, the monument's historic association with circulation and traffic around the Druid Monument. Although relocation would alter the Druid Monument's original location and would remain a significant and unavoidable impact under CEQA, retaining the Druid Monument within the intersection maintains the functional and visual relationship that historically contributed to its significance. For this reason, the City is not proposing to reconsider alternative off-intersection locations identified by the commenter.

The REIR nevertheless establishes specific requirements for protection of the Druid Monument during relocation. Mitigation Measure CUL-2 requires appropriate documentation prior to dismantling and requires a qualified professional and monument specialist to oversee the monument's dismantling, storage, movement, and

reinstallation. The measure also addresses protection of the Druid Monument during the relocation process and continued interpretation and recognition after it is reinstalled.

The commenter's recommendations regarding protective bollards, lighting, a raised footing, and other treatments are noted. These features concern the detailed treatment of the already-selected monument location and may be refined during PS&E, provided they are consistent with the approved relocation concept, applicable engineering and safety requirements, Mitigation Measure CUL-2, and Section 106 commitments.

As discussed in LR11-4, applicable vehicular turning movements, including those of larger vehicles, were considered during development of the 35-percent design plans. The monument location was therefore evaluated in the context of the proposed roadway and intersection geometry. Turning movements and clearances will continue to be verified as the project advances through PS&E, but this engineering refinement is not anticipated to result in relocation of the monument to a different site.

Accordingly, the commenter's suggested alternative monument locations are noted; however, the proposed location within the intersection has already been established through project design and coordination. Future design work will focus on the details necessary to safely protect, dismantle, store, reinstall, and physically protect the monument at that new location rather than reconsidering its placement. No revision to the REIR is necessary in response to this comment.

LR11-6: The commenter requests seismic vibration equipment be added onto the Soda Work building to reduce vibration effects generated by project construction.

The commenter is referred to Section 4.9 Noise and Vibration of the REIR, which specifically evaluates construction-related groundborne vibration and potential effects on older and historic buildings within the project vicinity. The analysis is based, in part, on the Ground Vibration Monitoring analysis prepared by Gasch Geophysical Services, Inc. (2018), which used four vibration monitoring instruments placed at locations around the project site to record peak particle velocity (PPV) associated with representative construction activities.

As discussed under Threshold B in Section 4.9 of the REIR, construction would involve equipment capable of generating groundborne vibration, including tractors, jackhammers, haul trucks, vibratory rollers, bulldozers, and drilling equipment; however, major vibration-generating equipment such as pile drivers would not be required. The REIR provides representative vibration levels for anticipated construction equipment and specifically evaluates the potential for vibration to affect older and historic buildings in the project vicinity.

The Ground Vibration Monitoring analysis included monitoring in the vicinity of a National Register of Historic Places-listed building and found a maximum measured vibration level of approximately 0.220 inch per second PPV, with the highest reading likely associated with vibratory compaction equipment used during asphalt paving. Although the measured levels were below the referenced criteria for structural damage, the REIR recognizes the sensitivity of older and historic buildings and provides additional protection through Mitigation Measure CUL-3.

Mitigation Measure CUL-3 in Section 4.4 Cultural Resources requires the City to perform vibration monitoring during project construction at the existing Clay Street/Main Street intersection. The J. Pearson Placerville Soda Works Building at 594 Main Street is expressly identified as one of the historic buildings subject to this monitoring requirement, along with the historic buildings at 582, 585, and 589 Main Street. Construction contracts are required to incorporate the applicable vibration restrictions.

Mitigation Measure CUL-3 also establishes the procedures required if monitoring identifies excessive vibration. If the applicable vibration level is exceeded, the City must stop work and implement alternative construction methods recommended in the Caltrans Transportation and Construction Vibration Guidance Manual to protect the historic resources. The selected methods must demonstrate that the Caltrans-identified threshold for risk of structural damage to historic buildings of 0.1 inch per second PPV, or another protective threshold identified through the analysis, would not be exceeded. Monitoring is required during construction, and the applicable vibration restrictions must be incorporated into the construction documents before public bidding.

Accordingly, the commenter's recommendation is substantively addressed by the REIR. Section 4.9 Noise and Vibration of the REIR provides the technical analysis of anticipated construction vibration and its potential effects on historic buildings, while Mitigation Measure CUL-3 establishes an enforceable monitoring and stop-work requirement specifically protecting the Soda Works Building and other nearby historic resources. The precise monitoring equipment and notification procedures may be established as part of implementation of CUL-3; however, installation of the specific seismic sensor and alarm system proposed by the commenter is not necessary because the REIR already requires monitoring, establishes a protective vibration threshold, and mandates cessation of work and implementation of alternative construction methods if that threshold is exceeded. No additional mitigation or revision to the REIR is necessary in response to this comment.

LR11-7: The commenter strongly opposes a roundabout at the historic intersection, arguing that it would not be the environmentally superior alternative and would instead increase adverse impacts on the area's historic character, aesthetics, parking, green space, and cultural resources. They contend that a modern roundabout could reduce the eligibility of a Historic Downtown Placerville District, create confusion for drivers, pedestrians, and bicyclists, and increase risks to the Druids Monument. The commenter also asserts that a roundabout could hinder emergency response, require additional land and infrastructure if expanded to multiple lanes, and conflict with voters' previous opposition to roundabouts in the area. Based on these concerns, the commenter concludes that a roundabout should not be considered in order to avoid increasing cumulative project impacts and to preserve the historic setting.

The City acknowledges this comment. Under CEQA Guidelines Section 15126.6, an EIR must evaluate a reasonable range of alternatives that could feasibly attain most of the project objectives while avoiding or substantially lessening significant environmental impacts, and it must compare the merits of those alternatives. CEQA also requires the EIR to identify an "environmentally superior alternative" so decision-makers and the

public can understand which option would result in the least overall environmental harm relative to the proposed project. Commentor is referred to Response LR7-12 for further discussion on the roundabout alternative. No additional mitigation or revision to the REIR is necessary in response to this comment.

LR11-8: The commenter urges the City to evaluate an alternative that preserves the existing Clay Street Bridge and adjacent south roadway as a dedicated pedestrian and bicycle path while constructing a new vehicle-only bridge upstream, arguing this could improve safety, retain parking and landscaping, avoid demolition of the historic bridge, and maintain emergency access during construction. They also request a transparent engineering analysis, including calculations showing whether the concept can or cannot physically fit and function, to ensure the REIR adequately considers the alternative and its potential benefits.

Please refer to Response LR8-5 which details how Section 6.5.1 Construct New Clay Street Bridge Parallel to Existing Bridge with Clay Street Realignment of the REIR analyzed a similar alternative and concluded that it would not meet the project objectives and would result in greater environmental impacts. No additional mitigation or revision to the REIR is necessary in response to this comment.

LR11-9: The commenter thanks the City for the opportunity to provide feedback and requests that project approval be postponed until staff, decision-makers, and the public reach consensus on the project's scope, alternatives, applications, and potential impacts.

The City appreciates the comment. Please refer to Global Response 7 as this comment is not specific to the adequacy of the REIR.

7.3.4.23 Comment Email ER1: Kelly Chiusano

Email Response 1

From: Melissa McConnell
To: Howry, Jennifer
Subject: Fwd: Clay street bridge comments
Date: Tuesday, March 12, 2024 10:34:03 AM

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Melissa McConnell, P.E.
Interim City Engineer
City of Placerville
3101 Center Street
Placerville, CA 95667
(530) 642-5250
mmcconnell@cityofplacerville.org

---------- Forwarded message ---------
From: **Kelly Chiusano** <kellychiusano@gmail.com>
Date: Tue, Feb 27, 2024 at 11:56 AM
Subject: Clay street bridge comments
To: mmcconnell@cityofplacerville.org <mmcconnell@cityofplacerville.org>

Hello to who this may concern, my name is Kelly Chiusano. I am a building /business owner at 651 Main St., Placerville, CA.
During the discussion, I heard that plans were to develop the locust Street parking lot to a more official parking area. This was to help add number of parking spaces due to this project taking some spaces away. My question is what is the current condition of the locust Street bridge and is it being reviewed for repair/ Replacement? Thank you so much for following up with answers. **ER1-1**
Also, wondering if the park on the north side of the creek has any design plans yet, I would like to see them as soon as possible thank you so much for your time. **ER1-2**
Kelly chiusano

7.3.4.24 Response to Comment Email ER1 Kelly Chiusano

ER1-1: The commenter states that through discussions they heard the Locust Avenue parking lot is planned to be developed as a more official parking area. The commenter inquires what the current condition of the Locust Avenue Bridge is and if the City is considering it being reviewed for repair or replacement.

Please refer to LR8-6 for a discussion of the Locust Avenue parking lot. Otherwise, the redevelopment/construction improvements of the Locust Avenue parking lot, Locust Avenue and the Locust Avenue Bridge are not part of the project scope of work for the proposed project. Please refer to Global Response 7.

ER1-2: The commenter inquires about design plans of the park on the north side of the creek and requests a copy of them if available.

Please refer to Responses LR5-5 for reconstruction of the creekside viewing area. Figure 3.4-1 has been updated with current engineering design. The relocated viewing area would be a flat section along the El Dorado Trail for the public to enjoy the views of the creek and fulfill the intent of the grant funding. Specific aesthetic design will be discussed when the City invites the public aesthetics-focused workshop to solicit input on creekside viewing area, along with other project detailed aesthetics during the PS&E phase of the proposed project. As such, this meeting has been added as a Mitigation Measure AES-1 to read the following:

Mitigation Measure AES-1: The specific aesthetic treatments, details, color pallets and material selections will be considered for the proposed project during the PS&E stage. These elements would be presented and discussed at a public meeting prior to finalization, providing the public with an opportunity to review and comment on proposed architectural treatments before they are incorporated into the final construction documents. After the meeting, the project shall incorporate the following streetscape and landscape design concepts:

- Low planter walls shall be placed along the Main Street and Clay Street edges of the reconfigured Ivy House parking lot in the same style as other surrounding rock wall features and to offer informal and temporary seating opportunities.
- Tree species as identified in Appendix A of the Main Street Streetscape Design Development Plan (incense cedar, tulip tree, valley oak, red oak, and Chinese pistache) shall be planted along Main Street in areas where ample room is supplied to define public space along the street and adjacent to parking lots to provide shade.
- Accent planting in large planting beds shall be provided adjacent to the reconfigured Ivy House parking lot.
- New streetlights installed as part of the project shall have light poles consistent with existing types along Main Street and must meet applicable

energy standards and City lighting specifications for safety of public roadways as set forth in Chapter XII, Section B, of the City's Development Guide.

7.3.4.25 Comment Email ER2: Deidre Moore Belfiore

Email Response 2

From: Melissa McConnell
To: Howry, Jennifer
Subject: Fwd: Clay Street Bridge Replacement EIR
Date: Tuesday, March 12, 2024 10:33:52 AM
Attachments: noname

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Melissa McConnell, P.E.
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---------- Forwarded message ---------
From: **Deidre Nutri-D Moore Belfiore CN, CHT** <d@getwellnesscenter.com>
Date: Mon, Feb 26, 2024 at 8:04 AM
Subject: Clay Street Bridge Replacement EIR
To: mmcconnell@cityofplacerville.org <mmcconnell@cityofplacerville.org>, Michael Potter <mike@getwellnesscenter.com>

Attn: Melissa McConnell, Interim City Engineer
Dear Ms. Melissa McConnell,
We have owned our home on Grandview Street for 24 years and I am a resident of El Dorado County for 43+ Years and will be pleased to receive clarification on a couple items, regarding the Clay Street Bridge. Some commuters will have to cut up over Coleman and some will have to take extra time to get out and I am very concerned for EMS and Fire etc., entering and exiting at certain high traffic times. Parades, events and normal commute times are of significant concern with being stuck in traffic. We have a lot of older folks in the community and the young newer families, who really need assurances for health and safety concerns.
1. How shall we deal with the extra traffic on the Mosquito Rd. side of Clay Street for those homeowners and the bottle necking it's going to take to shut the road down and get out on Main Street Clay v Mosquito Rd. Clay Street? Coleman cut over is an idea, otherwise it seems like it's going to be backed up. Please show the EIR. **ER2-1**
2. We have major historical preservation ties to the Druid Monument and do not want it damaged or broken in the move and we can only go off of the recent past that the light in front of the DAs office was not put back or repaired so we would like assurances that the historical monuments will be respected and properly cared for. **ER2-2**
This monument is irreplacebale and I am very concerned for it being moved and it's priority to not be damaged.
Thank you for your work and response.
Remember to Breathe,
--

Deidre "Nutri-D" Moore Belfiore, CN, CHT
Nutrition & Lifestyle Consultant & Clinician, Patient Advocacy
MPL Group's GetWellness Center & GetWellness Foundation, Non-Profit

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Alert: For your protection and our customer's data security, we remind you that this unsecured email service is not intended for sending confidential or sensitive information. Please do not include social security numbers, account numbers, or any other personal or financial information in the content of the email when you respond.

7.3.4.26 Response to Comment Email ER2 Deidre Moore Belfiore

ER2-1 The commenter expresses concern regarding emergency ingress and egress during construction, particularly for fire and emergency medical services, as well as for vulnerable residents such as elderly individuals and families with young children. The commenter also expresses concern that construction-related detours could increase traffic on Mosquito Road and result in motorists using Coleman Street as a cut-through route.

Section 4.10 Transportation and Traffic of the REIR evaluates temporary construction-related traffic effects under Thresholds A and C. As described therein, Clay Street would be closed between Main Street and the U.S. 50 undercrossing for a period not to exceed 12 months during bridge construction. During this closure, Mitigation Measure TRAF-1 requires implementation of a Construction Traffic Management Plan that includes advance notification, temporary traffic control, detour signing, and road closure signage. As described in the REIR, traffic destined for Clay Street north of U.S. 50 would be temporarily detoured via Bedford Avenue to Coleman Street or via Mosquito Road to Clay Street.

Importantly, Mitigation Measure TRAF-1 also requires coordination with the El Dorado County Fire Protection District and the City of Placerville Police Department to allow emergency access to neighborhoods north of the bridge to be maintained throughout construction. This coordination is intended to preserve emergency response capability while construction activities are underway.

The temporary use of Mosquito Road and Coleman Street as designated detour routes during construction is part of the traffic management strategy evaluated in the REIR. With implementation of Mitigation Measure TRAF-1, temporary construction traffic impacts, including emergency access considerations, are reduced to a less-than-significant level. Therefore, the REIR adequately analyzes and addresses the concerns raised by the commenter. No revision to the REIR is necessary in response to this comment.

ER2-2 The commenter is concerned about the Druid Monument being damaged or broken during project construction and relocation. The concern is acknowledged. Please refer to Global Response 5 and Response LR2-2 and LR11-5. As discussed therein, the REIR identifies mitigations measure developed through development of REIR and the Section 106 process to minimize potential damage to the Druid Monument during removal, storage and relocation. Moreover, relocation of the Druid Monument would relocate it away from direct vehicular traffic conflicts and the deteriorating subterranean Cedar Ravine Culvert.

7.3.4.27 Comment Email ER3: Ruth Michelson

Email Response 3

From: Melissa McConnell
To: Howry, Jennifer
Subject: Fwd: Clay Street Bridge Replacement EIR
Date: Tuesday, March 12, 2024 10:33:39 AM

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Melissa McConnell, P.E.
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---------- Forwarded message ---------
From: **Ruth Michelson** <ruthmichelson@sbcglobal.net>
Date: Mon, Feb 19, 2024 at 12:53 PM
Subject: Clay Street Bridge Replacement EIR
To: mmcconnell@cityofplacerville.org <mmcconnell@cityofplacerville.org>
Cc: Cleve Morris <cmorris@cityofplacerville.org>

Dear Ms. McConnell, Interim City Engineer,

I am in receipt of a letter dated February 9th, 2024, from the City of Placerville, Engineering Department. This letter refers to a meeting being held 2/26/24 regarding the Draft REIR.

I have the following comments regarding the **Feb 9th, 2024 letter.**

1) The letter itself states the project will "preserve/retain the historic character of the area." This is troubling, as this whole project is the definition of NOT preserving or retaining the historic character of the area. Let's call it what it is, and not state otherwise.

ER3-1

2) The final paragraph in this letter says that provided written comments on the REIR a minimum of ten business days before the scheduled City Council hearing on the final EIR and proposed project will be included in the Final REIR. *No date is stated for this City Council hearing for the Final EIR*, so when is the "10 days before deadline?" (Now I see on the link that the comment period is **January 26th, 2024 - March 12, 2024**. I think this time period could have been stated in the notification letter dated February 9, 2024.)

ER3-2

Comments on the Draft REIR

3) 1.4.3 of the Executive Summary states that the new bridge would necessitate the realignment of Clay Street, but no reason is stated why. I disagree that it would necessitate the realignment, and I think this wording should be changed to state it is an option.

4) If the bridge must be replaced due to its age, I support ALTERNATIVE 2 – CLAY STREET BRIDGE REPLACEMENT ONLY/NO CLAY STREET REALIGNMENT.

ER3-3

5) Table 2.9.1 Cultural Impacts. Thank you for updating the 2018 version that said in section 4.4.5 "Less than culturally sensitive." Now the wording is "Cause a substantial adverse change in the significance of a historical resource pursuant to Section15064.5?" The provided mitigation measures seem substantive.

ER3-4

6) page 44 states "Given the close proximity of the Main Street/Clay Street and Main Street/Cedar Ravine Road intersections, long queues routinely back up on Main Street making turning into and out of Clay Street difficult" I've never seen this problem, and I've travelled in this area for 39 years. Is this anecdotal information, or has it been observed, quantified, and documented? The one exception may be the Apple Hill weekends in October when travelers take Clay Street as a detour returning home, but that hardly is a year-round problem.

ER3-5

7) "3.4.2 Clay Street Realignment and New intersection Improvements In order to accommodate the proposed bridge replacement, prevent impacts to adjacent private properties, and prevent further worsening of the poor performance of the adjacent intersections, Clay Street would be realigned to form a four-way intersection consisting of Main Street, Clay Street, and Cedar Ravine Road." You haven't made a convincing argument that this is true.

ER3-6

8) Depiction of bridge in Figure 3.4-3. That bridge is unattractive, the side views have the appearance of red brick, angular modern lines, and does not in any way fit in with the look of Historic Main Street. Could you go back to the drawing board on the bridge appearance, please?

ER3-7

9) Page 68. "The Clay Street Bridge is a low and narrow concrete arch bridge representative of the early twentieth century era of transportation architecture. Within the context of its surroundings, the bridge provides visual interest east and west on the El Dorado Trail and contributes to the quaint character of Clay Street, but it is **not unique or aesthetically noteworthy**." Aesthetically noteworthy is in the eye of the beholder, and plenty of citizens think the bridge is noteworthy. Perhaps if the writers of this report lived and worked in this area, they may have a different viewpoint.

ER3-8

10) Page 78 "The General Plan recognizes Hangtown Creek and historic buildings in historic downtown as scenic resources. The General Plan includes numerous policies intended to protect those resources as well as the overall visual integrity of the downtown area. The proposed project site is visually dominated by the Ivy House parking lot, Main Street, Clay Street, Cedar Ravine Road, and the intersections of Main Street/Clay Street and Main Street/Cedar Ravine Road. ***These features are***

ER3-9

modern, engineered, transportation-related features that are not unique or visually significant. The Druid Monument and historic buildings that abut the proposed project boundary are recognizable and important elements of the visual landscape." Follow the General Plan. The sentence in italics does not fit in with the remainder of the paragraph.

ER3-9

11) Page 304. 5.14-3. Project Analysis . "The proposed project would replace the existing one-lane Clay Street Bridge with a new two-lane bridge, **requiring the realignment of Clay Street** to form a new four-way intersection with Main Street and Cedar Ravine Road. The existing bridge currently accommodates two-way traffic as Clay Street is a two-lane roadway north and south of the bridge. Thus, the replacement of the bridge is not capacity increasing. The proposed project would provide safer vehicle, pedestrian, and bicycle travel compared to existing conditions." No, the realignment of Clay Street is not required if the bridge is replaced. This is simply an option.

ER3-10

Summary

a) Replace the bridge if you must, due to it's age and safety issues.
b) Please build the bridge to look as though it fits in an Historic District area. What has been designed is too modern looking.
c) Don't re-align Clay Street. This is truly unnecessary work. Just because you "can" doesn't mean you "should." There is very little, if any, true justification for it.

ER3-11

Sincerely,

Ruth Michelson
Building/Business co-owner
352 Main Street, Placerville

7.3.4.28 Response to Comment ER3 Ruth Michelson

ER3-1: This comment is specific to the February 9, 2024, letter the commenter received. The commenter provides their opinion that the project by definition will not preserve/retain the historic character of the area. The comment is not specific to the analysis adequacy of the REIR. Please refer to Global Response 7. No revision to the REIR is necessary in response to this comment.

ER3-2: This comment is specific to the February 9, 2024 letter the commenter received. The commenter questions the request to provide written comments on the REIR a minimum of ten days before the schedule of City Council hearing; however, the commenter notes that no date was established in the Final EIR for the City Council hearing.

The City acknowledges the commenter's concern. CEQA establishes specific requirements for public notice and review of a draft or recirculated EIR. Pursuant to CEQA Guidelines Section 15087, the lead agency must provide public notice of the availability of a draft EIR and provide an opportunity for public review and comment during the established review period. Section 15087 also provides that a public hearing on an environmental document may be conducted, but a public hearing is not required as an element of the CEQA environmental review process.

CEQA does not require the date of the subsequent City Council hearing at which the Final EIR may be considered for certification to be established or included in the REIR. Rather, prior to approving the project, the City Council must be presented with and review and consider the Final EIR and must certify that the Final EIR was completed in compliance with CEQA, reflects the City's independent judgment and analysis, and was considered before project approval, consistent with CEQA Guidelines Section 15090.

The statement in the February 9, 2024 letter regarding submission of comments prior to the City Council hearing did not alter or shorten the established public review period for the REIR. Notice of the date, time, and location of the City Council hearing would be provided separately in accordance with applicable City and public-hearing noticing requirements once the hearing was scheduled. Accordingly, the absence of a City Council hearing date in the REIR does not affect compliance with CEQA's public review and noticing requirements. Please also refer to Global Response 7. No revision to the environmental analysis of the REIR is necessary in response to this comment.

ER3-3: The commenter indicates that Section 1.4.3 Project Characteristics under the Executive Summary of the REIR does not state why the new bridge would necessitate realignment of Clay Street and the commenter provides their opinion disagreeing that the project would necessitate realignment. The commenter provides support for implementation of Alternative 2. This specific section of the REIR summarizes the project characteristics based on the City Council direction to staff to go forward analyzing the proposed project. Additional details for why the realignment is required are provided in Global Response 3, Chapter 3 Project Description of the REIR, and in Section 6.6 Environmentally Superior Alternative of the REIR. No revision to the REIR is necessary in response to this comment.

ER3-4: The commenter expresses gratitude for updating the 2018 version in Section 4.4.5 from “Less than culturally sensitive” and notes that the wording has been changed to “Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5”. The commenter also provides their opinion that the mitigation measures provided seem substantive. Please refer to Global Response 7. No revision to the REIR is necessary in response to this comment.

ER3-5: The commenter references on page 44 of the REIR a sentence that states long queues routinely back up on Main Street, making turning into and out of Clay Street difficult. The commenter disagrees with this statement based on their travel in the area and asks if this statement is anecdotal information or if it has been observed, quantified, and documented. This specific statement in the REIR is discussed in the environmental setting discussion of Chapter 3 Project Description and is from data provided by City engineers as well as circulation deficiencies identified in the Transportation Analysis Report prepared by Fehr and Peers for the proposed project in February 2018. This report states that queues can build up during peak times on certain approaches in the project area. No revision to the REIR is necessary in response to this comment.

ER3-6: The commenter provides their opinion that the City has not provided a convincing argument that realignment of Clay Street is necessary. Please refer to Global Response 3 for a discussion on the need for realignment of the intersection. No revision to the REIR is necessary in response to this comment.

ER3-7: The commenter references Figure 3.4-3 and provides their opinion that the bridge is unattractive and does not fit with the look of Historic Main Street. The commenter asks that bridge appearance be reexamined.

Figure 3.4-3 of the REIR depicts a rendering of the bridge showing wooden guardrails and a rock/stone facade. The REIR identifies the renderings as conceptual and for illustrative purposes only. The visual simulations and renderings provided in the REIR are repetitive illustrations intended to depict the general scale, form and context of the proposed bridge and associated improvements. They are not final design drawings and should not be interpreted as depicting the precise architectural treatments, materials, colors, textures or finishes that will be incorporated into the completed project. Please refer to Global Response 6 regarding final design and final landscaping details.

This rendering attempted to mimic an architectural treatment that was used on a previous bridge replacement project at Bedford Avenue in the City. Following environmental review and approval of the project, the specific aesthetic treatments, details, color palettes and material selections will be considered for the bridge during the PS&E stage. These elements would be presented and discussed at a public meeting prior to finalization, providing the public with an opportunity to review and comment on proposed architectural treatments before they are incorporated into the final construction documents. Please refer to Global Response 6 and the review Mitigation Measure AES-1. No revision to the REIR is necessary in response to this comment.

ER3-8: The commenter references two sentences on page 68 of the REIR which states that the existing bridge is not unique or aesthetically noteworthy. The commenter opines that the aesthetic noteworthiness of the bridge is in the eye of the beholder and that many of the residents and employees in the area think of the bridge otherwise.

The City acknowledges that the existing bridge may be a recognized feature to some in the community. The statement in the REIR was made within the context of the CEQA aesthetic impact analysis. This analysis evaluates whether the bridge constitutes a visually distinctive feature within the existing visual environment and whether its removal under the proposed project would substantially degrade visual quality as defined under CEQA. Refer to Comment Response LR9-3. As analyzed in Section 4.1 Aesthetics of the REIR, the features of the existing bridge do not meet the specific definitions of uniqueness nor aesthetic noteworthiness. No revision to the REIR is necessary in response to this comment.

ER3-9: The commenter references a paragraph on page 78 of the REIR which describes the existing setting of the project site and specifically states that the Ivy House parking lot, Main Street, Clay Street, Cedar Ravine Road, and the intersections of Main Street/Clay Street and Main Street/Cedar Ravine Road are modern, engineered, transportation-related features that are not unique or visually significant. The commenter opines that description of these transportation related features does not fit with the remainder of the paragraph.

The referenced paragraph serves as an introduction to the existing visual environment within the proposed project boundaries. The referenced paragraph has been changed to read the following for clarification:

The General Plan recognizes Hangtown Creek and the historic buildings within downtown Placerville as scenic resources and includes numerous policies intended to protect those resources and maintain the overall visual character of the downtown area. Within the project vicinity, the visual environment is composed of both historic and modern elements. Hangtown Creek, the Druid Monument, and the adjacent historic commercial buildings are prominent visual features that are recognizable and important elements of the visual landscape. In contrast, the project site also includes contemporary transportation infrastructure, including Main Street, Clay Street, Cedar Ravine Road, the Ivy House parking lot, and their associated intersections, which collectively define the existing transportation setting.

ER3-10: The commenter references page 304, Section 5.14-3 Project Analysis of the REIR emphasizing the statement “...requiring the realignment of Clay Street…” and opines that the realignment of Clay Street is not required if the bridge is replaced and is simply an option. Please refer to Global Response 3 regarding the realignment of Clay Street. No revision to the REIR is necessary in response to this comment.

ER3-11: The commenter summarizes the comments they have provided emphasizing replacing the bridge if necessary because of deteriorating conditions, designing the new bridge to fit into the Historic District, and not realigning Clay Street as part of the proposed project. Please refer to Global Responses 1 and 2 which pertain the existing

bridge condition and bridge replacement versus rehabilitation, respectively; please refer to response to Response ER3-7 and Global Response 4 pertaining to the bridge aesthetic treatment and design; and, refer to Global Response 3 pertaining to why a Clay Street realignment is required for the proposed project.

7.3.4.29 Comment Email ER4: Jennifer Abrahams

Email Response 4

From: Melissa McConnell
To: Howry, Jennifer
Subject: Fwd: Clay Street Bridge Replacement EIR
Date: Tuesday, March 12, 2024 10:33:28 AM

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---------- Forwarded message ---------
From: **Abrahams, Jennifer** <Jennifer.Abrahams@tetratech.com>
Date: Sat, Feb 17, 2024 at 8:34 AM
Subject: Clay Street Bridge Replacement EIR
To: mmcconnell@cityofplacerville.org <mmcconnell@cityofplacerville.org>

The proposed four-way intersection at Cedar Ravine Road and realigned Clay Street appears to be poorly thought out from a health and safety perspective. The proposed intersection is much larger than the current three-way intersection, and the proposal leaves the intersection as a four-way stop with pedestrian cross walks at each corner. At a minimum, there should be traffic signals at this proposed intersection to clearly identify the appropriate right of way to protect pedestrians. ER4-1

Regards,

Jennifer Abrahams

7.3.4.30 Response to Email Comment ER4 Jennifer Abrahams

ER4-1: The commenter opines that the design of the project is poorly thought out from a health and safety perspective as it includes a four-way stop with pedestrian cross walks at each corner. The commenter believes the project should include traffic signals at the intersection to clearly identify the appropriate right-of-way to protect pedestrians.

The City acknowledges the commenter's concern regarding pedestrian safety. Improving safety and accessibility for pedestrians, bicyclists and motorists fall under Objectives B and C of the proposed project (see Section 3.3 Project Objectives).

Under existing conditions, pedestrians crossing Main Street at Cedar Ravine Road must navigate an offset intersection at an uncontrolled crosswalk with multiple turning movements and limited pedestrian connectivity between Cedar Ravine Road, Clay Street, and the El Dorado Trail. The existing intersection configuration requires pedestrians to cross near two closely spaced intersections, increasing the number of potential vehicle conflict points and creating a less direct and intuitive pedestrian route.

The proposed project consolidates the existing Main Street/Clay Street and Main Street/Cedar Ravine Road intersections into a single four-way intersection, simplifying traffic operations and reducing the number of conflict points for all roadway users. The proposed project includes continuous ADA-compliant sidewalks across the replacement bridge, marked crosswalks at the stop-controlled intersection, curb ramps meeting current accessibility standards, Class III bicycle facilities, and improved pedestrian connections between Main Street, Clay Street, Cedar Ravine Road, and the El Dorado Trail. These improvements provide a more direct and predictable pedestrian crossing environment than currently exists.

The transportation analysis presented in the REIR evaluated the operational performance of the proposed all-way stop-controlled intersection and concluded that it would operate acceptably while improving overall safety compared to existing conditions. A *T*ransportation Analysis Report was prepared for the proposed project by Fehr and Peers in February 2018 and included signal warrant analysis for the improved intersection under the existing conditions, existing plus project conditions, and cumulative conditions scenarios. The warrant to signalize an intersection is based on AM and PM Peak Traffic Volumes, intersection volume capacity, intersection safety, and ancillary traffic impacts. Under the existing conditions and existing plus project conditions, the analysis did not identify installation of a traffic signal at the Main Street/Clay Street/Cedar Ravine Road intersection as necessary. While future regional traffic growth could result in traffic volumes that warrant signalization, any future decision to install a signal would be based on engineering studies conducted in accordance with the California Manual on Uniform Traffic Control Devices (CA MUTCD) and would not be attributable to the proposed project. No revision to the REIR is necessary in response to this comment.

7.3.4.31 Comment Email ER5: Kirsten Vincent

Email Response 5

From: Melissa McConnell
To: Howry, Jennifer
Subject: Fwd: Clay Street Bridge Replacement EIR
Date: Tuesday, March 12, 2024 10:34:17 AM

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---------- Forwarded message ---------
From: **Kirsten Vincent** <kirsten.vincent@live.com>
Date: Thu, Feb 29, 2024 at 1:56 PM
Subject: Clay Street Bridge Replacement EIR
To: mmcconnell@cityofplacerville.org <mmcconnell@cityofplacerville.org>

Good afternoon,

Thank you for your plans to improve the Clay St. Bridge and surrounding intersections. We have long struggled to turn left onto Main St., sometimes waiting for minutes on end, and oftentimes endangering pedestrians and drivers alike who are unclear on the right of way. I am looking forward to this being addressed with these changes.

ER5-1

My main concern for this project is the potential for **increased frequency and speeding auto traffic on Clay St.**

Clay St. is already an unofficial "back roads" for many people, and we often have cars driving too quickly from the top of Clay St. down to Main St. The homes on Clay St. as well as the surrounding streets already have to deal with this, and I am worried that by connecting Clay St. to Cedar Ravine we will see a dramatic increase in traffic and speeding. There are many families with young children in the neighborhood, including the apartment buildings at the top of Clay St. and even a children's playground on a side street. **PLEASE INCLUDE SPEED MITIGATION EFFORTS IN YOUR PLANS**

ER5-2

While I don't have a preference for what kind of interventions you use (radar, speed bumps, increased stop signs) I beseech you to please include something and don't just leave it to

chance.

ER5-2

Thank you for your time.

Best,
Kirsten Vincent
2870 Grandview St.
(650) 773-9605

7.3.4.32 Response to Email ER5 Kirsten Vincent

ER5-1: The commenter appreciates the City's plan to implement the proposed project based on safety issues they have experienced in the area. Please refer to Global Response 7. No revision to the REIR is necessary in response to this comment.

ER5-2: The commenter requests that the project include implementation of speed reduction mitigation measures from the top of Clay Street to Main Street as vehicles exceed the posted speed limit causing safety issues with residents/residential units along the route. The City appreciates the commenter's feedback; however, implementing speed mitigation measures from the top of Clay Street to Main Street is not part of the scope for the proposed project. Please refer to LR8-3 and LR9-2 for a discussion on the 25-mph design speed of the project. Additionally, this comment does not concern the analytical adequacy of the REIR. Please refer to Global Response 7. No revision to the REIR is necessary in response to this comment.

7.3.4.33 Comment Email ER6: Michael Potter

Email Response 6

From: Melissa McConnell
To: Howry, Jennifer
Subject: Fwd: Clay Street Bridge Replacement
Date: Tuesday, March 12, 2024 10:34:41 AM

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---------- Forwarded message ---------
From: **Coach Mike** <mike@getwellnesscenter.com>
Date: Sat, Mar 9, 2024 at 9:14 AM
Subject: Clay Street Bridge Replacement
To: <mmcconnell@cityofplacerville.org>

Hi, Melissa-

After the meeting regarding the Clay Street Bridge Replacement Project, I wanted to take time to discuss the process and procedures with my friends and neighbors. After careful thought and needs assessment these are the items mentioned for consideration: ER6-1

1. Can the bridge be supported, widened to the east, and railings added to the bridge? This would reduce the cost and time of the project.

2. How are they going to support the Soda building on Main Street? Perhaps they can shore that up before the project beings. Keeping the old structures of the 1800's is crucial tomPlacerville's quaintness. ER6-2

3. Is it possible to raise the monument rather than move it? Anytime a structure of that age is tampered with, damage is certain. ER6-3

4. By extending and widening Clay Street Bridge, vehicle speed is an issue; especially from the bike trail north. We would like speed bumps placed on Clay Street, extended up to Grandview Street, to protect our children and citizens. ER6-4

5. With the high sidewalks on Clay street, there must be railings placed for the protection of children and citizens. Plus the badly need repair. There have been a number of people falling off of the sidewalks. ER6-5

6. Environmental issues arise when construction takes place. How will the project address the creek protection and clean up?

ER6-6

In care,

Michael Potter, MBA, CN, CHT
Nutrition & Lifestyle Consultant & Clinician, Patient Advocacy
*MPL Group's GetWellness Center's
*GetWellness Foundation, a Non-Profit 501(c)(3)

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7.3.4.34 Response to Email ER6 Michael Potter

ER6-1: The commenter asks why the bridge cannot be supported, widened to the east, and railing added to the bridge. Please refer to Global Response 3 which provides further explanation as to why the bridge needs to replaced rather than rehabilitated. No revision to the REIR is necessary in response to this comment.

ER6-2: The commenter asks how the Soda building on Main Street will be supported during project construction. In Section 4.4.7, the REIR and Response LR11-6 identifies the Soda Works building as being in close proximity of the project construction area and the analysis of vibrational impacts during construction of the proposed project. No revision to the REIR is necessary in response to this comment.

ER6-3: The commenter suggests raising the Druid Monument rather than relocating it.

The City considered several options for the Druid Monument during preplanning, including whether the monument could remain in its existing location (please refer to Global Response 5); however, both the engineering design and cultural resources analyses concluded that this is not feasible.

The existing Druid Monument is located within the footprint of the proposed travel lanes and conflicts with the intersection geometry necessary to provide proper lane alignment through the new four-leg intersection. The proposed geometry aligns the Clay Street travel lanes with Cedar Ravine Road so that through traffic can travel across Main Street in a direct and predictable path. Raising the monument vertically would not eliminate this horizontal conflict, remove the monument from the vehicle travel path, or reduce the risk of future vehicle strikes. Furthermore, raising the monument would not avoid the need to dismantle the resource during construction. Construction of a higher foundation or pedestal would require the monument to be carefully documented, disassembled, and reconstructed in substantially the same manner required for relocation. In addition, it would not provide the improved pedestrian accessibility and interpretive opportunities achieved by the proposed protected refuge island location. For these reasons, relocation of the monument was determined to be the only feasible approach that satisfies the proposed project objectives while providing long-term protection of the monument and maintaining its public visibility and historic association with the intersection. Please refer to Global Response 5 for further information on the protective measures for the Druid Monument. No revision to the REIR is necessary in response to this comment.

ER6-4: The commenter is concerned that the widening of Clay Street due to project implementation would increase vehicle speed causing safety issues for residents and pedestrians. The commenter requests that the project implement speed bumps on Clay Street to Grandview Street to mitigate speed and safety issues. Please refer to Response ER5-2. No revision to the REIR is necessary in response to this comment.

ER6-5: The commenter expresses concern about the high sidewalks on Clay Street causing safety issues with people falling off the sidewalk. The commenter requests railing along the sidewalk on Clay Street. The proposed project would include new

sidewalks on the eastern and western side of the new bridge that would conform to the existing sidewalks between the US 50 overpass and the northern project limits. These sidewalks would be ADA compliant. Improvements to the existing sidewalks outside and north of the project boundary is not under the scope of the proposed project. Please refer to Global Response 7. No revision to the REIR is necessary in response to this comment.

ER6-6: The commenter asks how the creek will be protected and cleaned up during and post construction activities. Section 4.7 Hydrology and Water Quality of the REIR identifies Hangtown Creek (Subsection 4.7.2.2) as a surface water feature bisecting the project site and provides analysis as to potential impacts to the creek during project construction activities. The proposed project would comply with City, the California Building Code (CBC) standards, and BMPs pertaining to erosion control prevention, such as the use of silt fencing and fiber rolls, through the development of a Stormwater Prevention Pollution Plan (SWPPP). The SWPPP would also comply with NPDES General Construction, CWA Section 404, and CWA Section 401 and CDFW Section 1602 permitting requirements for preventing erosion and siltation at the construction site. All trash and construction debris would be contained and not be stored in areas near the creek where accidental releases into the creek could occur. The REIR adequately analyzes the potential impacts to Hangtown Creek during project construction and adequately implements BMPs and standard conditions that would require the City to maintain creek water quality during construction. No revision to the REIR is necessary in response to this comment.

7.3.4.35 Comment Email ER7: Karen Peck

Email Response 7

From: Melissa McConnell
To: Howry, Jennifer
Subject: Fwd: Clay Street Renovation
Date: Tuesday, March 12, 2024 10:34:30 AM

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---------- Forwarded message ---------
From: **Karen Peck** <karenppeck@me.com>
Date: Mon, Mar 4, 2024 at 10:59 AM
Subject: Clay Street Renovation
To: <mmcconnell@cityofplacerville.org>

Dear City Council and Planning Committee,

As the city proceeds with the bridge renovation project at Clay Street, I want to voice my concern over the inevitable increase in traffic to the area.

Coming off Grandview onto Clay Street is already a challenge. Seeing up the hill and down around the curve, takes patience and some cunning, as one inches into the intersection.

As well, cars already drive down Clay fast, with fewer slow downs mandated (e.g., stop signs, road bumps) my concern is there will be accidents.

Finally, as all living in the foothills already know(!) deer are always a driver's worry. Please know the whole of Clay Street and Grandview Street are deer thoroughfares! So I'd expect more deer casualties and severely damaged vehicles if our city doesn't put in place strict measures during and after this construction. ER7-1

My hope is residents concerns are acknowledged, and we will see measures taken to slow traffic and raise awareness.

Thank you for your consideration of this important issue to our neighborhood.

Sincerely,

Karen Peck

2876 Grandview Street
Placerville, CA

Sent from my iPhone

7.3.4.36 Response to Email ER7 Karen Peck

ER7-1: The commenter is requesting that the City address anticipated traffic safety impacts associated with the project, including increased traffic volumes, limited visibility at the Grandview Street/Clay Street intersection, speeding vehicles, and risks to wildlife crossings. The commenter urges the City to acknowledge neighborhood concerns and implement traffic-calming and awareness measures during and after construction to improve safety for residents, drivers, and deer.

The City acknowledges the concern regarding vehicle speeds and pedestrian and neighborhood safety. The purpose of the proposed project is not to increase vehicle speeds. Rather the design of the replacement bridge is needed to correct existing structural and geometric deficiencies, provide two standard travel lanes, accommodate emergency vehicles, provide continuous pedestrian and bicycle facilities, and meet current roadways and bridge design requirements. The roadway and bridge improvements have a design speed of 25 miles per hour, consistent with the low-speed urban setting of the project area.

Section 4.10 Transportation and Traffic, specifically under Threshold C, discloses that the existing conditions of the project increase safety risks because of the deteriorated conditions of the existing bridge and poor configuration of the existing Clay Street/Main Street intersection. The proposed project would decrease vehicle accidents in the intersection, vehicle conflicts with the Druid Monument, and would improve emergency vehicle circulation in that the new bridge would allow for the parallel passing of vehicles and emergency service vehicles simultaneously.

Finally, it should be noted that visibility issues at the Grandview Street/Clay Street intersection, vehicle speed to the north of US 50, and deer crossing concerns are outside of the project site and are not under the scope or design of the proposed project. Concerns regarding existing speeding or driver behavior within the surrounding neighborhood are also recognized; however, enforcement of posted speed limits and implementation of neighborhood traffic-calming measures are operational matters that are separate from the environmental impacts of the bridge replacement project. If warranted based on observed traffic conditions, the City may evaluate additional traffic-calming or enforcement measures through its ongoing traffic management programs. No additional mitigation related to vehicle speeds is required because of the proposed project. No revision to the REIR is necessary in response to this comment.

7.3.4.37 Comment Email ER8: Vicki Clark

Email Response 8

From: Melissa McConnell
To: Howry, Jennifer
Subject: Fwd: Questions and opinions on the Clay St Bridge Project
Date: Tuesday, March 12, 2024 4:09:02 PM

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---------- Forwarded message ---------
From: **James Clark** <jnvicki@pacbell.net>
Date: Tue, Mar 12, 2024 at 4:05 PM
Subject: Questions and opinions on the Clay St Bridge Project
To: mmcconnell@cityofplacerville.org <mmcconnell@cityofplacerville.org>
Cc: jnvicki@pacbell.net <jnvicki@pacbell.net>

City of Placerville;

Clay Street Bridge Project,

I don't feel that doing this project would be a positive thing for many reasons.

Not necessarily in this order.

ER8-1

The historic down town continues to be encroached on, a little at a time. Example the bulb outs.

Years ago when I went to a few historical advisory committee meetings they were looking at the area up a little past Turner street to the large gray house? As the historic district.

ER8-2

I came across a letter Dated April 18,2018. To Mr. Rivas. Here are some excerpts from that letter.

The letter was from the Historic Bridge Foundation regarding the bride that would be replaces. The bridge has a rating of 62.6 despite the fact that the bridge is rated in good health and structure. Noted; As an example there have been several project within the US where the decks of concrete arch bridges have been widened. Historic bridges within the US are being

ER8-3

removed at a rapid rate. This type of bridge is not as common (then and now) as many of the standardized bridge types built during that era. (1890 through the 1920s) Parts from the letter:

Because they are not common. A Context of Common Historic bridge types, published by TRB in 2005, suggests that this bridge type is significant as it represents the evolution of concrete bridges. I was given another book on concrete bridges. I was surprised how much history is involved and the different types of bridges that have been developed over the years. Has anyone looked into the real cost of the above option. Make it part of bike path/walking trail. The streets in the historic district are narrow. Especially when cars are parked. It seems strange to me that we put a wide bridge and then it narrows to upper Clay St. What traffic is being planned from development on Upper Clay Street in order to connect Clay and Cedar Ravine. It looks to me like there maybe several from some of the City maps I have seen. Along with a mention of a light? Clay Street also comes out by the Mosquito Park and Ride. There is a stop currently at the Cedar Ravine intersection. Please look into other alternatives. ER8-3

Make the bridge and upper Clay St. a one way street like several other towns do. After all of the changes that were done in Folsom I have not talked to anyone that likes it. That saw it before the remodel. They have the buildings with a lot of new concrete. People like to come to Historic Hangtown not a replica. It was the Gold Rush with a lot of History. I have seen some of the older towns in the Bay Area that were updated. Livermore and Niles. They look the same to me. Just place to go out and eat. ER8-4

Another question. Parking continues to be removed and never replace. You never take into account there are senior citizens that like to shop down town that are not handy caped that find it difficult to walk long distances with our currant parking. A person I spoke to recently, who is from this area could not find parking at all, and ended up parking in a parking lot almost to Broadway. ER8-5

I spoke to some one a few days ago that had received a notice regarding up coming construct already.

If so it sounds like the comments are just a formality that has to be done. That all of this has been decided. Let the people vote on this project. ER8-6

Thank You,

Vicki Clark

Placerville

7.3.4.38 Response to Email ER8 Vicki Clark

ER8-1: The commenter believes that the project would not be positive. The City appreciates the comment. Please refer to Global Response 7. No revision to the REIR is necessary in response to this comment.

ER8-2: The commenter states remembering the historical advisory committee considering the historic district past Turner Street to the large gray house. The City appreciates the comment. Please refer to Global Response 7. No revision to the REIR is necessary in response to this comment.

ER8-3: The commenter is requesting that the City further evaluate alternatives to replacing the historic Clay Street Bridge, including preservation, rehabilitation, or widening options, given its reported structural condition and historical significance as a rare concrete arch bridge. The commenter also seeks clarification on project costs, potential impacts from future traffic and development, and how the proposed bridge design would fit with the narrow streets and transportation needs of the historic district.

Please refer to Global Response 1 for the existing bridge condition, Global Response 2 for discussion of bridge replacement vs. rehabilitation, Global Response 3 for information on the need for intersection realignment, and Global Response 5 for information on the historic status of the existing bridge. No revision to the environmental analysis of the REIR is necessary in response to this comment.

ER8-4: The commenter is requesting that the City consider alternatives to the current bridge design, such as making the bridge and upper Clay Street one-way, rather than relying solely on the existing traffic controls at the Cedar Ravine intersection.

The City considered an alternative that would retain a narrower or one-way configuration on Clay Street (refer to REIR Section 6.5.3 Clay Street Bridge Rehabilitation and Reclassification). Maintaining a one-way crossing would not fully address the existing operational, access, safety, and multimodal deficiencies or meet the purpose and need of the proposed project. The existing bridge provides approximately 17 feet of roadway width and effectively functions as a single-lane bottleneck between two-way roadway segments on either side of Hangtown Creek. The proposed two-lane bridge is intended to provide a continuous and predictable roadway configuration, improve access for emergency and service vehicles, and eliminate conflicts associated with vehicles entering the existing narrow bridge from opposing directions.

A one-way configuration would also require motorists traveling in the opposite direction to use alternative routes through the surrounding street network. This could redistribute traffic onto other neighborhood streets rather than eliminating those trips and could increase out-of-direction travel. Maintaining two-way access across Hangtown Creek provides more direct circulation between Main Street and areas north of the creek and avoids relying on surrounding neighborhood streets to accommodate traffic displaced by a one-way restriction.

Furthermore, this option is not supported by first responders or the Greater Placerville Wildfire Evacuation Preparedness, Community Safety, and Resilience Study (June 2024) by El Dorado County Transportation Commission (EDCTC).

Please refer to Global Response 4 for information on the historic bridge and preservation measures developed for the proposed project. No revision to the environmental analysis of the REIR is necessary in response to this comment.

ER8-5: The commenter expresses concerns for the loss of parking in the proposed project vicinity and how it is not being replaced.

The City acknowledges that the project would result in the removal and reconfiguration of existing parking spaces within the City-owned Ivy House parking lot adjacent to Clay Street Bridge. Please refer to Responses LR8-6 and ER1-1 regarding parking.

As discussed in Section 4.10.7 of the REIR, the proposed project site includes the Ivy House parking lot, which currently contains 72 parking spaces. The City currently provides leased parking spaces to businesses for employee use at the Ivy House parking lot. Of the 72 parking spaces, 37 spaces are allocated for leased parking, and there are currently 30 leased parking space permits. (For further clarification, there is a total of 72 parking spaces. Of those 72, 37 are reserved for leased parking. Of the 37 reserved for lease parking, 30 are currently occupied by leased permits. Therefore, of the 72 parking spaces, 35 are reserved for public use.) There is also on-street parking and two other public lots within one-quarter mile of the proposed project that includes over 80 other parking spaces. To determine the proposed project's effect on parking supply, a survey of area parking facilities was conducted in March and September 2014 within approximately one-quarter mile of the proposed project site. For the typical midweek day (Wednesday) surveyed, the Ivy House parking lot had a maximum of 42 of the total 72 spaces occupied. All the parking areas surveyed had less than 75 percent peak occupancy during the afternoon/evening period.

In 2014, the City acquired a parking lot on Locust Avenue adjacent to the El Dorado Trail for public parking with the purpose of offsetting the loss of spaces at the Ivy House parking lot due to the proposed project. The Locust Avenue parking lot is located approximately 400 feet northeast of the Ivy House parking lot, provides close parking spaces for businesses in the 600-700 block of Main Street, currently provides informal parking (approximately 25 spaces), and reduces parking demand at the Ivy House parking lot.

Furthermore, in approximately 2009, the California Natural Resources Agency approved revisions to the CEQA Guidelines, deleting the CEQA Appendix G checklist question regarding parking availability. The loss of parking spaces is not, by itself, considered a significant physical environmental impact. Physical impacts to the environment from a project as a result of parking changes are analyzed under CEQA in the appropriate resources section, for example consistency with City policies regarding parking, or air quality impacts during project operation.

Accordingly, while the City recognizes that the loss or relocation of convenient parking may be an important concern to residents, businesses, and visitors, inconvenience or a

reduction in parking supply does not constitute a significant environmental impact under CEQA absent evidence that it would result in a significant physical effect on the environment. The REIR does not identify such a significant secondary physical effect from the proposed parking changes. No revision to the REIR is necessary in response to this comment.

ER8-6: The commenter expresses they were notified of upcoming construction and expresses that their comments are a formality, and they believe the decision of project approval has already been decided.

The REIR, under Section 3.4.8 Construction Activities, references project construction commencement in either 2025 or 2026 and would last approximately 9 to 12 months. CEQA requires the City, as lead agency, to complete its environmental review and consider the environmental information contained in the EIR before deciding whether to approve the project. Please see Section 2.4 Decision-Making Process of the REIR for a full description on the environmental review process. The proposed project and REIR is anticipated to be heard by the City Council in October 2026. The City Council at that time will consider project approval, certification of the REIR, and adoption of the REIR Findings of Fact and Statement of Overriding Considerations. Based on this, the REIR has been updated in the following manner on page 56, first sentence under Section 3.4.8:

Construction is expected to begin in Spring 2029 and take approximately 9 to 12 months to complete.

7.3.4.39 Comment Email ER9: Bret, Nancy, Ryan and Alex Stone

Email Response 9

From: Melissa McConnell
To: Howry, Jennifer
Subject: Fwd: Clay Street Bridge Replacement EIR
Date: Tuesday, March 12, 2024 7:24:55 PM

[CAUTION] External Email. DO NOT click links or open attachments unless expected. Please use the "Phish Alert" button to report all suspicious emails.

Another one that had the wrong email address! I guess it's a common mistake.

Melissa McConnell, P.E.
Interim City Engineer
City of Placerville
3101 Center Street
Placerville, CA 95667
(530) 642-5250
mmcconnell@cityofplacerville.org

---------- Forwarded message ---------
From: **Nancy** <blazingatrailtravel@gmail.com>
Date: Tue, Mar 12, 2024 at 7:22 PM
Subject: Fwd: Clay Street Bridge Replacement EIR
To: mmcconnell@cityofplacerville.org <mmcconnell@cityofplacerville.org>

---------- Forwarded message ---------
From: **Nancy** <blazingatrailtravel@gmail.com>
Date: Tue, Mar 12, 2024 at 1:12 PM
Subject: Clay Street Bridge Replacement EIR
To: <mcconnell@cityofplacerville.org>

Hi Melissa,
Bret & I are submitting this letter on behalf of our business Main Street Melters in the Victorian building located at 589 Main Street, in the historic section of the Clay Street Bridge. We have looked over the proposed project and feel it will affect us so much that we will likely not make enough money to continue serving our delicious sandwich to our local community and travelers from all over northern california & beyond.
It's important to Bret & I, our son's, daughter-in-laws, & employees that the City respects the history that surrounds the downtown areas of placerville. Why not refurbish the bridge instead of replacing it. ER9-1
Based on our personal knowledge, observing the day to day traffic, the only problem we see is that drivers speed down Clay Street. The speeding issue can be resolved by placing a rumble strip or speed bump in the southbound lane before the bridge. We feel that the bridge replacement plan will likely speed up traffic and endanger the pedestrian & bike traffic trying to make it to Main Street Melters. Also, mentioned we would have 16 less parking spots, that's ER9-2

revenue we can't afford to lose.
We were here for the recent storms, and the flood water did not threaten to overflow the bridge or any buildings in this area.

ER9-2

If the City of Placerville wants to spend money on the Clay Street Bridge Project why not build a Pedestrian,bicycle, wheelchair access adjacent to the historic bridge, maybe even a sitting area that attaches to the existing park below, with additional parking where farmers market was a few years ago. I believe less money can be spent without interfering too much with our business.
I know you and other City employees have spent many hours trying to figure this out, hopefully you will take into consideration some of our ideas.

ER9-3

Best Regards,
Bret, Nancy, Ryan, & Alex Stone

7.3.4.40 Response to Email ER9 Bret, Nancy, Ryan and Alex Stone

ER9-1: The commenter, as a business owner in the vicinity of the proposed project, is concerned that the project will economically hurt their business. The commenter asks why the existing bridge cannot be refurbished rather than replaced.

The City evaluated retaining and rehabilitating the existing bridge. See Global Response 3 for a detailed description on bridge replacement vs. rehabilitation. No revision to the environmental analysis of the REIR is necessary in response to this comment.

ER9-2: The commenter is concerned about vehicles speeding on Clay Street and the commenter feels like a wider bridge will promote greater vehicle speeds endangering pedestrians and bicyclists. The commenter is also concerned about the loss of parking due to project implementation which the commenter feels could affect their business. The commenter also references recent storms where they did not see overflow of water from the creek over the existing bridge and nearby buildings.

Please refer to Responses ER5-2 and ER7-1 for further discussion on speed reduction and ER4-1 for a discussion on pedestrian and bicycle safety. Regarding parking, please refer to response to Response ER8-5.

Regarding flooding during storms, a new Preliminary Hydraulic Study and Scour Analysis (Domenichelli 2025) was developed for the proposed project. Based on the model, the existing bridge is predicted to nearly overtop during both the 50-year and 100-year event with no clearance at the top soffit at the bridge arch under existing conditions. Please refer to Section 4.7 Hydrology and Water Quality, Section 4.7.2.3 Flooding, for updates to flooding information.

The new bridge deck would have 2.29 feet of clearance between the bridge soffit and the modeled 50-year water surface elevation and approximately 1.53 feet of clearance above the modeled 100-year water surface elevation. The proposed bridge therefore exceeds the minimum 2-foot freeboard criterion for the 50-year event and conveys the 100-year event without pressure flow. (see page 235, Section 4.7 Hydrology and Water Quality, Threshold F). No revision to the environmental analysis of the REIR is necessary in response to this comment.

ER9-3: The commenter suggests building pedestrian, bicyclists and wheelchair access adjacent to the existing bridge rather than bridge replacement as part of the project implementation.

The City acknowledges the commenter's suggested approach. Please refer to Global Responses 1 and 2 regarding the existing condition and deficiencies of the Clay Street Bridge, the purpose and objectives of the proposed project, and the feasibility of rehabilitating and retaining the existing bridge. The project is intended to address not only pedestrian and bicycle accessibility, but also the structural and functional deficiencies of the existing bridge, roadway geometry, two-way vehicular circulation,

emergency access, hydraulic performance, and other project objectives. Accordingly, providing separate pedestrian, bicycle, and ADA-accessible facilities while otherwise retaining the existing bridge would not address all of the proposed project objectives.

The commenter is also referred to Chapter 6 Project Alternatives of the REIR, which evaluates a reasonable range of alternatives to the proposed project, including alternatives involving retention or rehabilitation of the existing bridge. Section 6.5 evaluates alternatives considered but eliminated from further analysis, including construction of a new Clay Street bridge parallel to the existing bridge with the existing bridge retained for pedestrian and bicycle use, rehabilitation of the existing bridge, and rehabilitation and reclassification of the existing bridge. The REIR explains the reasons these alternatives were eliminated from further consideration, including their ability to meet the project objectives, engineering feasibility, and comparative environmental effects.

Please also refer to Responses LR7-7 and LR7-8, which address requests for additional alternatives involving rehabilitation or retention of the existing bridge combined with a separate pedestrian/bicycle bridge or facility.

Accordingly, the commenter's suggested approach does not identify a new alternative requiring additional analysis in the REIR. No revision to the environmental analysis of the REIR is necessary in response to this comment.

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8. Organizations and Persons Consulted

Federal Agencies

United States Fish and Wildlife Service

State Agencies

California Resource Agency

California Air Resources Board

Department of Water Resources

Department of Fish and Game

Department of Health Services

Native American Heritage Commission

Department of Transportation Districts 03

Department of Toxic Substances Control

Regional Water Quality Control Board / Central Valley Region Other Interested Consulting Parties

Section 106 Consulting Parties

United Ancient Order of the Druids, Grand Grove, Historic Monument Committee

Shingle Springs Band of MiWok Indians

Friends of Historic Hangtown

Friends of Clay Street

Wopumnes Nisenan MeWuk Indians (unregistered)

9. Report Preparers

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Wood Rodgers

Stacey Randall, P.E.	Project Engineer

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Appendices

Available on USB at the City of Placerville Engineering Department and online at https://www.cityofplacerville.org/clay-street-bridge

Appendix A. Notice of Preparation (NOP)/Initial Study (IS) and Comments

Appendix B. Peremptory Writ of Mandate

Appendix C: Clay Street Bridge Materials Testing Report

Appendix D: Air Quality and GHG Modeling

Appendix E: Office of Historic Preservation (OHP) Correspondence

Appendix F. List of Technical Studies

The following technical studies were used in the preparation of this document are available upon request at City of Placerville Engineering Department. For copies of these documents, please contact:

Melissa McConnell
Project Manager
(530) 642-5250
mmcconnell@cityofplacerville.org

Please note that any studies documenting known and potential cultural resources in the proposed project area will not be made available to the public to protect Native American tribal rights and interests.

- Clay Street Realignment and Bridge Replacement Project Natural Environment Study. Drake Haglan & Associates. 2016.

- California Register of Historical Resources Evaluation and DPR 523 Forms for the Clay Street Bridge. Michael Baker International. Nayyar, Margo. 2020.

- Historic Property Survey Report for Clay Street Realignment and Bridge (25C-0117) Replacement Project, Placerville, El Dorado County, California. Approved by Caltrans District 3 Office of Environmental Management. PAR (PAR Environmental Services, Inc.). 2019.

- Historical Resources Evaluation Report, Clay Street Realignment and Bridge (25C-0117) Replacement Project, Placerville, El Dorado County, California. Approved by Caltrans District 3 Office of Environmental Management. PAR 2019

- Archaeological Survey Report, Clay Street Realignment and Bridge (25C-0117) Replacement Project, Placerville, El Dorado County, California. Approved by Caltrans District 3 Office of Environmental Management. PAR 2019 (Confidential Report: available to Professional Archaeologists who meet the Secretary of the Interior Standards for Archaeology).

- Extended Phase 1 Report for the Clay Street Realignment and Bridge (25C-0117) Replacement Project, Placerville, El Dorado County, California. Approved by Caltrans District 3 Office of Environmental Management. PAR 2019. (Confidential Report: available to Professional Archaeologists who meet the Secretary of the Interior Standards for Archaeology).

- Finding of Adverse Effect (FOAE) for the Clay Street Bridge (25C-0117) Replacement Project, City of Placerville, California. Federal Project Number: BRCMLO-5015 (011). Approved by Caltrans District 3 Office of Environmental Management, PAR 2021.

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- Clay Street Realignment and Bridge Replacement Project Initial Site Assessment (ISA) Drake Haglan & Associates 2016.

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