
**APPENDIX A – NOTICE OF PREPARATION/
INITIAL STUDY AND
COMMENT LETTERS RECEIVED**



NOTICE OF PREPARATION

DATE: August 11, 2014

TO: Responsible Agencies, Organizations and Interested Parties

LEAD AGENCY: City of Placerville
Contact: Pierre Rivas
3101 Center St.
Placerville, CA 95667

SUBJECT: Environmental Impact Report for the Clay Street Bridge Replacement and Realignment Project

In discharging its duties under Section 15021 of the California Environmental Quality Act (CEQA) Guidelines, the City of Placerville (as Lead Agency) intends to prepare an Environmental Impact Report, consistent with Article 9 and Section 15161 of the CEQA Guidelines, for the Clay Street Bridge Replacement and Realignment Project. In accordance with Section 15082 of the CEQA Guidelines, the City of Placerville has prepared this Notice of Preparation to provide Responsible Agencies and other interested parties with sufficient information describing the proposal and its potential environmental effects.

The determination to prepare an Environmental Impact Report was made by the City of Placerville. An Initial Study has been prepared pursuant to CEQA Guidelines Section 15063, which identifies the anticipated environmental effects of the project.

As specified by the CEQA Guidelines, the Notice of Preparation will be circulated for a 30-day review period. The City of Placerville welcomes public input during this review. A scoping meeting will be held on Wednesday, August 27th from 5:00 p.m. to 8:00 p.m. at the Placerville Town Hall, 549 Main St, Placerville, CA. In the event that no response or request for additional time is received by any Responsible Agency by the end of the review period, the Lead Agency may presume that the Responsible Agency has no response.

Comments may be submitted in writing during the review period and addressed to:

City of Placerville
Attn.: Pierre Rivas
3101 Center Street
Placerville, CA 95667

The comment period closes on September 9, 2014.

ENVIRONMENTAL CHECKLIST FORM

1. **Project title:** Clay Street Bridge Replacement and Realignment Project
2. **Lead agency name and address:** City of Placerville
3101 Center Street
Placerville, CA
95667
3. **Contact person and phone number:** Pierre Rivas, Development Services
Department
(530) 642-5569
4. **Project location:** Intersection of Main Street and Cedar Ravine Street and the Clay Street Bridge in Placerville, California.
(see **Figures 1** and **2** for project vicinity and project location)

5. Description of Project:

The Clay Street Bridge Replacement and Realignment Project proposes to replace the Clay Street Bridge over Hangtown Creek, realign Clay Street with Cedar Ravine Road at Main Street, and improve the intersection of Main Street and Cedar Ravine Road. The project proposes the following improvements:

- Replace the bridge over Hangtown Creek at Clay Street with a single-span cast-in-place conventionally reinforced slab bridge structure of 32 feet in length and approximately 46 feet in width.
- Realign Clay Street between US 50 and Main Street.
- Reconstruct the intersection of Main Street, Cedar Ravine Road and Clay Street.

The realignment and widening of Clay Street will result in a loss of parking within the Ivy House lot. The existing Clay Street alignment will be converted to parking, and the Ivy House lot will be split into two separate lots. The net loss of parking is approximately 34 spaces; however, the City has identified several locations that can be developed to mitigate and result in a no net loss of parking spaces.

The intersection of Main Street and Cedar Ravine Road is currently a 3-way stop controlled intersection. Main Street is a two lane minor arterial that runs east-west and is frequently congested throughout the day. Cedar Ravine Road is a two lane minor arterial that runs north-south and terminates at Main Street at the north end. Clay Street is a local two lane two way road (one lane at the bridge) that runs north from Main Street, serves residences north of US 50 and crosses Hangtown Creek just south of US 50. The Clay Street bridge is approximately 32 feet long and 19 feet wide (17.5 feet clear), which is substandard, and is functionally obsolete. The City of Placerville adopted the Main Street Streetscape Design Development Plan (2005) which calls for reconstruction of the Main Street/Cedar Ravine intersection to include Clay Street.

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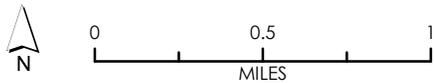
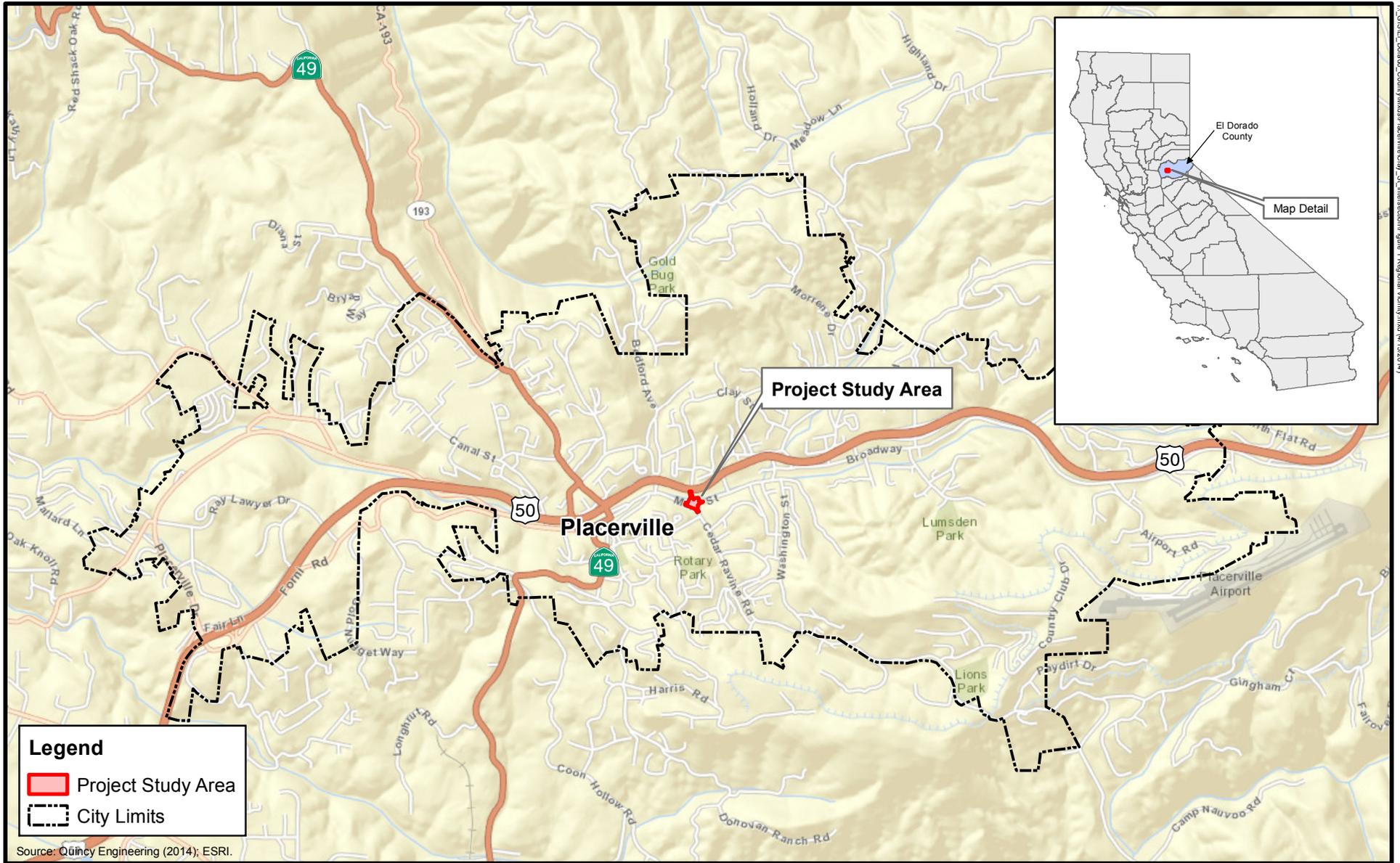
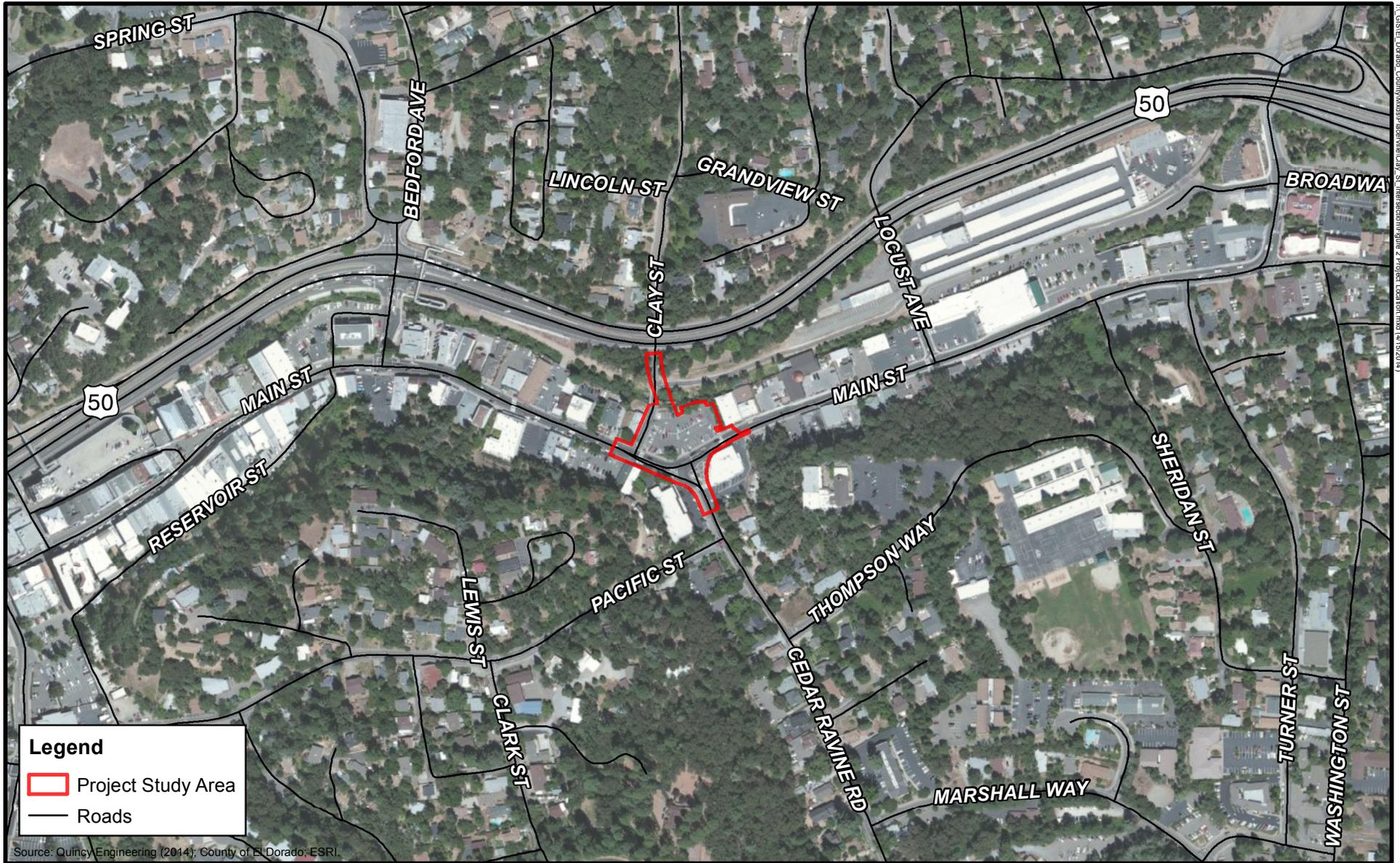


Figure 1
Regional Vicinity
PMC

T:\GIS\EL_Dorado_County\Map\Placerville\CI_V_S_Intersction\Figure 1 Regional Vicinity.mxd (4/15/2014)



T:\GIS\El_Dorado_County\MapServer\berwick\City_St_Intersection\Figure 2 Project Location.mxd (4/15/2014)



Figure 2
Project Location



The proposed project is necessary to improve roadway safety, reduce congestion, and meet current and future traffic needs.

Project Alternatives

The project alternatives discussed below are preliminary and are subject to change during the project development process. The City is currently working with Caltrans and other stakeholders to develop reasonable alternatives that would meet the project purpose and need while minimizing impacts to the community and environment.

Alternative 1 – Signalized Intersection

Alternative 2 will realign Clay Street, bringing it into the intersection at Main Street and Cedar Ravine Road, and provide a traffic signal at the reconstructed intersection. The realignment of Clay Street will bisect the Ivy House parking lot. See **Figure 3** for standard intersection design.

Alternative 2 – All-Way Stop Intersection

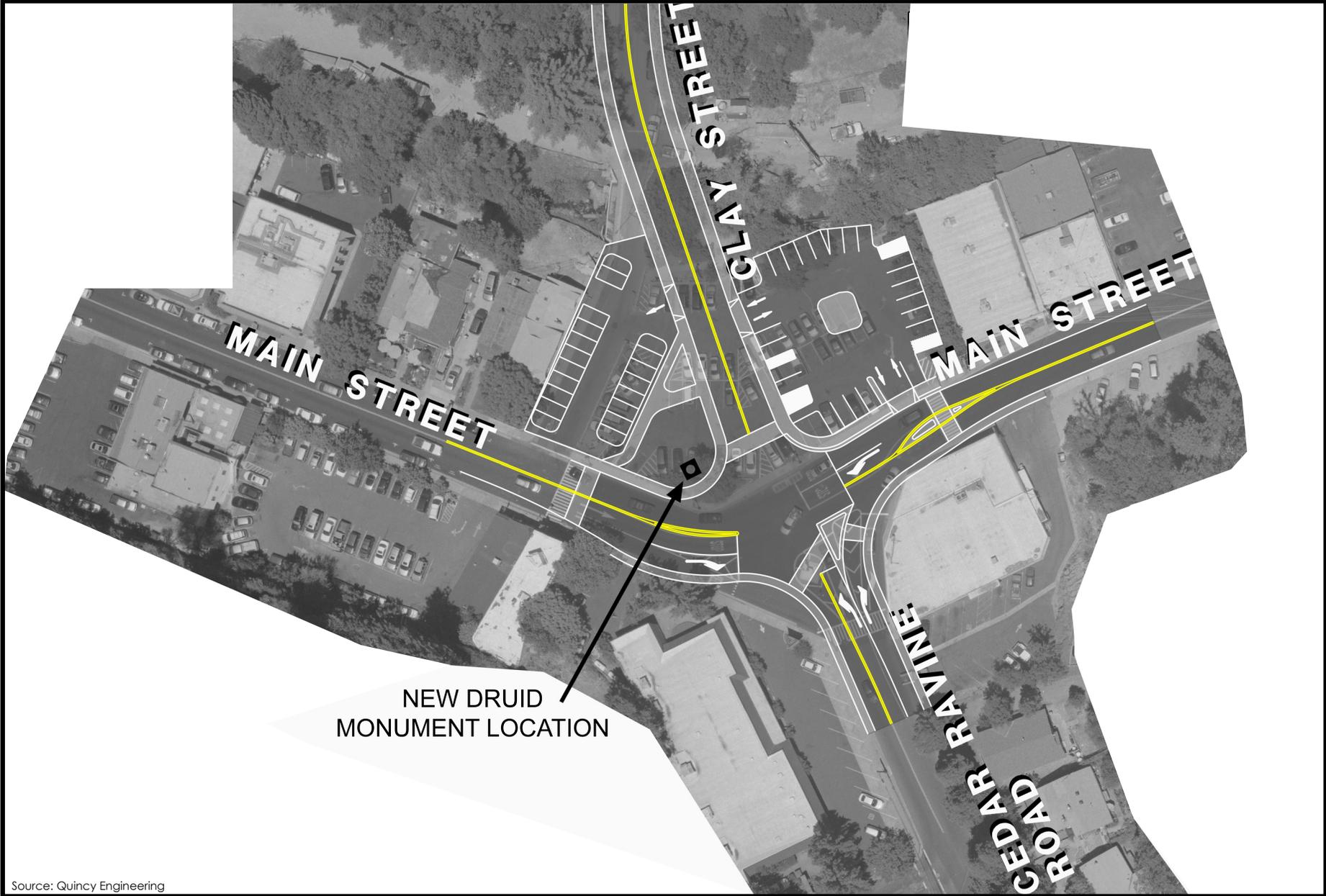
Alternative 3 will realign Clay Street, bringing it into the intersection at Main Street and Cedar Ravine Road, and provide an all-way stop at the reconstructed intersection. The realignment of Clay Street will bisect the Ivy House parking lot. See **Figure 3** for standard intersection design.

Alternative 3 – No Project Alternative

Alternative 4 is the No Project Alternative. Under this alternative, the intersections at Cedar Ravine Road and Clay Street would remain the same as existing conditions. The Clay Street Bridge would not be replaced. The number of parking spaces would remain the same with 72 spaces in the Ivy House parking lot. The No Project Alternative would not include any improvements to the project area other than routine maintenance of existing facilities and the potential for future upgrades to the existing bridge.

6. Surrounding land uses and setting: The project site is surrounded by commercial uses at the Main Street/Cedar Ravine Road intersection and Clay Street south of Hangtown Creek. Hangtown Creek flows beneath the Clay Street Bridge where the El Dorado Trail terminates. Areas zoned for single-family residential uses exist north of US 50 and adjacent to the commercial areas surrounding the project site.

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Source: Quincy Engineering

Not To Scale



Figure 3
Signal or All-Way Stop Build Alternative



7. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

- Caltrans (encroachment permit, NEPA clearance)
- El Dorado County Community Development Agency (Advisory);
- El Dorado County Air Quality Management District
- El Dorado County Resource Conservation District (Advisory)
- California Department of Fish and Wildlife
- Central Valley Regional Water Quality Control Board

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology/Soils |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities/Service Systems | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Pierre Rivas, Development Services Department

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion of Impacts

- a) *Less than Significant Impact.* The City of Placerville General Plan Background Report (1989) identifies the historic buildings in downtown Placerville and Hangtown Creek as the primary scenic resources in the project area. The proposed project involves reconstruction of an existing intersection, realignment of an existing road, replacement of an existing bridge facility, none of which would significantly alter the views of downtown Placerville or Hangtown Creek. Although this impact is considered less than significant, further discussion will be included in the EIR.
- b) *Less than Significant Impact.* The proposed project is located south of US 50, which is designated as a state scenic highway. The proposed project involves reconstruction of an existing intersection, realignment of an existing road, replacement of an existing bridge facility, none of which would significantly alter the views of downtown Placerville as seen from US 50. Views of downtown Placerville along the segment of US 50 of which the proposed project site is located are partially obstructed by a row of trees along the southern edge of the highway.
- c) *Less than Significant with Mitigation Incorporated.* The proposed project would alter the existing visual character of the project area. The realignment of Clay Street and reconstruction of the Main Street, Cedar Ravine Road, and Clay Street intersection will require relocation of the Druid Monument to the northwest corner of Main Street and Clay Street. Mitigation is available to reduce this impact to a less than significant level.
- d) *Less than Significant with Mitigation Incorporated.* The proposed project includes minor rearrangement of light fixtures to accommodate the reconstructed intersection, realigned roadway, and redesigned parking areas. Minor rearrangement of light fixtures will not significantly change the lighting of the project area; however, construction of the proposed project may include lighting that would temporarily affect day or nighttime views in the area. Mitigation will reduce this impact to a less than significant level.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 45260), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forestland or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) 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 forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Impacts

- a) *No Impact.* The proposed project site is located in an area designated as Urban and Built-Up Land and does not include any Prime or Unique Farmland or Farmland of Statewide Importance as identified by the California Department of Conservation (California Department of Conservation, 2011). Additionally, the project site is not currently used for agricultural resources, and is not adjacent to existing agricultural operations. Therefore, implementation of the proposed project would have no impact on agricultural resources. This issue will not be addressed further in the EIR.
- b) *No Impact.* Land surrounding the proposed project site is zoned Single-Family Residential and Commercial under the City of Placerville General Plan (1990). No Williamson Act contracts exist on the project site (California Department of Conservation, 2013). Furthermore, adjacent properties are not under a Williamson Act Contract. This issue will not be addressed further in the EIR.
- c) *No Impact.* The proposed project components will take place in areas zoned for commercial use. Although native trees exist in the project vicinity, the proposed project would not conflict with existing zoning for, or cause rezoning of forestland, timberland, or timberland zoned for Timberland Production. Therefore, this issue will not be addressed further in the EIR.

- d) *No Impact.* There are no designated forestlands within the project site or surrounding area. As a result, the proposed project would not cause any loss of forestland or the conversion of forestland to non-forest use. Therefore, this issue will not be addressed further in the EIR.

- e) *No Impact.* Refer to impacts a) through d). The proposed project does not involve any changes or alterations to the existing environment that could result in the conversion of Farmland to nonagricultural use or forestland to non-forest use, as no Farmland or forestland exists in the area surrounding the project site. Therefore, this issue will not be addressed further in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Impacts

a-c) *Potentially Significant Impact.* The proposed project lies within the Mountain Counties Air Basin in western El Dorado County. The basin is in non-attainment for ozone (California Air Resources Board, 2010). Construction of the proposed project would include activities that could result in air quality impacts. Stationary and mobile construction equipment as well as employee and delivery vehicles could result in increases in ozone precursors, carbon monoxide (CO), and particulate emissions. Additional vehicle emissions could occur if construction activities increase traffic congestion.

During project operation, existing traffic patterns would be altered, which could affect carbon monoxide levels in the project vicinity. However, alternatives 1 and 2 would improve traffic operations and congestion in the project area, which would reduce delays and vehicle idling times, and improving air quality through reduction of emissions.

El Dorado County has established significance thresholds for air quality (El Dorado County Air Quality Management District, 2002). Emissions generated during construction and emissions from vehicles traveling through the project site during operation have the potential to exceed the significance thresholds established by the El Dorado County Air Quality Management District. This issue will be discussed further in the EIR.

d) *Less than Significant Impact with Mitigation Incorporated.* The proposed project would result in short-term construction related air pollutant emissions, including particulate matter,

carbon dioxide, carbon monoxide, methane, nitrogen oxides, and ozone precursors. The proposed project is located within one-quarter mile of an elementary school and residential communities. Pollutant emissions resulting from the proposed project could potentially expose these sensitive receptors to pollutants; however, incorporation of mitigation measures will reduce this impact to less than significant. Therefore, this impact is considered less than significant with mitigation incorporated and will be discussed further in the EIR.

- e) *Less than Significant Impact.* Construction activities could temporarily create objectionable odors that could impact sensitive receptors in the project vicinity. Operation of the proposed project is not expected to emit objectionable odors. This impact is considered less than significant and will be discussed further in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Impacts

- a) *Potentially Significant Impact.* The project site is located within an area of El Dorado County that is known to have state and federally protected special-status species. A Natural Environment Study (NES) is being prepared by Sycamore Environmental for proposed project. Preliminary findings of the NES indicate that the project will have no effect on federal-listed species or critical habitat. Species of special concern include, but are not limited to California red-legged frog, Foothill yellow-legged frog, Northwestern pond turtle, Pleasant Valley mariposa-lily, Red Hills soaproot, and Brandegees clarkia. A biological site assessment must be completed to determine if the project site contains suitable habitat for any state or federally listed species under existing conditions. Preparation of the EIR will include an evaluation of the existing biological habitat type at

the project site, and will address the potential for the proposed project to result in impacts to protected plant and animal species. These issues will be discussed further in the EIR.

- b) *Potentially Significant Impact.* Please see discussion of issue a). The proposed project would replace the Clay Street Bridge over Hangtown Creek, a perennial creek which may support riparian habitat and other natural communities. The analysis in the EIR will include an evaluation of the potential for wetlands or other federally protected waters of the US within the project area that may be affected by implementation of the proposed project. Impact to these habitats would be considered potentially significant, and will be discussed further in the EIR.
- c) *Potentially Significant Impact.* Please see discussions of issues a) and b). The proposed Clay Street Bridge replacement over Hangtown Creek and Clay Street realignment would likely result in impacts to waters of the US. This impact is considered potentially significant, and will be discussed further in the EIR.
- d) *Less than Significant Impact.* The proposed project consists of reconstruction of the Main Street/Cedar Ravine Road intersection, realignment of Clay Street, and replacement of the Clay Street Bridge over Hangtown Creek. The proposed project would not place any structures within these areas that would impede wildlife movement. Pre-construction surveys will be conducted for the proposed project for birds of prey and birds listed under the Migratory Bird Treaty Act. This impact is considered less than significant and will be discussed further in the EIR.
- e) *No Impact.* Although the City of Placerville has a tree preservation policy and ordinance in place, the ordinance would not apply to this project. The proposed project will be in compliance with local policies or ordinances protecting biological resources. This issue will not be discussed further in the EIR.
- f) *No Impact.* El Dorado County's Integrated Natural Resources Management Plan is a county-wide habitat conservation plan/natural community conservation plan. The project site is located within the Integrated Natural Resources Management Plan planning area; however this plan has not been adopted to date. Furthermore, the proposed project is located in a previously disturbed, urban, built-up area. As a result, no conflict with an adopted habitat conservation plan or natural community conservation plan will occur. This issue will not be discussed further in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion of Impacts

a-d) *Potentially Significant Impact.* Archaeological and historic investigations for the Clay Street Bridge Replacement and Realignment Project were conducted by Tremaine & Associates in 2009. These investigations included a records search of the National Register of Historic Places, California Register of Historic Resources, California Department of Transportation Bridge Inventory, California State Historic Landmarks, California Inventory of Historic Resources, Points of Historical Interest, the US Geological Survey Placerville Sheet and Placerville Quadrangle; a sacred lands search conducted by the Native American Heritage Commission (NAHC); and consultation with the Native American community (Tremaine & Associates 2009). These investigations identified the Druid Monument as a historic feature, but no prehistoric cultural resources were identified during the survey. Additionally, the investigations identified a high potential for the presence of subsurface historic period cultural materials within the project area. The Caltrans Historic Bridges Inventory Update for Concrete Arch Bridges (October 2004) identifies the bridge over Hangtown Creek at Clay Street as a bridge facility that does not appear to meet the criteria for listing in the National Register (Caltrans 2004). During construction, there is potential for unrecorded historical resources, archaeological resources, paleontological resources, and human remains to be discovered. These impacts would be considered potential significant, and will be discussed further in the EIR.

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

Discussion of Impacts

- a)
 - i. *Less than Significant Impact.* There are no known faults crossing through the project site or in the immediate vicinity of the project site. The site is not located within an Alquist-Priolo earthquake hazard zone (California Department of Conservation, 2007). The City's General Plan Background Report (1989) does not indicate any significant seismic hazards in the vicinity of the site. Furthermore, the proposed project will not result in the development of habitable structures or other development that would typically cause an increase in population that

- could be adversely affected by rupture of an earthquake fault. This impact will be discussed further in the EIR.
- ii. *Less than Significant Impact.* The project area is considered to be an area of low risk for seismic ground shaking. However, in California there is the risk that a seismic event could occur at anytime. The proposed project will not result in the development of habitable structures or other development that would typically cause an increase in population that could be adversely affected by seismic ground shaking. Furthermore, the proposed project would be designed in accordance with the requirements of the Uniform Building Code and the City of Placerville Standard Construction Specifications. As a result, the risk of adverse effects from ground shaking is minimal and is considered to be less than significant. This impact will not be discussed further in the EIR.
 - iii. *Less than Significant Impact.* Soils at the project site are classified as Placer diggings composed of alluvium derived from mixed sources as a result of more than 100 years of disturbance from urban development (Natural Resources Conservation Service, 2013). A Preliminary Foundation Report prepared by Taber Consultants for the proposed project found that soils surrounding the Clay Street Bridge appear adequately stable and capable of providing support for the proposed bridge replacement. Furthermore, the proposed project will not result in the development of habitable structures or other development that would typically cause an increase in population that could be adversely affected by seismic-related ground failure, including liquefaction. Therefore, the proposed development would have a less than significant impact related to soil stability, seismic-related ground failure, or liquefaction. This impact will be discussed further in the EIR.
 - iv. *Less than Significant Impact.* The project site is relatively flat, and does not include slopes greater than 20 percent. Based on the topography of the project site and the surrounding area, the potential for landslides to occur on the project site is quite low. This impact is considered less than significant and will be discussed further in the EIR.
- b) *Potentially Significant Impact.* Construction of the proposed project may result in temporary increases in soil erosion. The proposed project will require a construction-related Storm Water Pollution Prevention Plan (SWPPP), consistent with section 402 of the Clean Water Act. Construction activities will include implementation of Best Management Practices (BMPs) for stormwater runoff identified in the SWPPP. The potential for soil erosion resulting from the proposed project is considered a potentially significant impact, and will be discussed further in the EIR.
 - c) *Less than Significant Impact.* As discussed in a) iii, the proposed project site is underlain by soils classified as Placer diggings composed of alluvium derived from mixed sources as a result of more than 100 years of disturbance from urban development. Soils surrounding the Clay Street Bridge have been identified as adequately stable and capable of providing support for the proposed bridge replacement. The topography of the site is relatively flat, and it is unlikely any hazards associated with landslides, lateral-spreading, subsidence, liquefaction, or collapse would occur. This impact is considered less than significant. This issue will be discussed further in the EIR.

- d) *Less than Significant Impact.* Generally, soils in western El Dorado County have a low to moderate shrink-swell potential. According to the Natural Resources Conservation Service, the project site is underlain by soils classified as Placer diggings composed of alluvium derived from mixed sources due to more than 100 years of disturbance from urban development. This impact is considered less than significant, and will be discussed further in the EIR.

- e) *No Impact.* The proposed project would include reconstruction of the Main Street/Cedar Ravine Road intersection, realignment of Clay Street, and replacement of the Clay Street Bridge. The proposed project would not include features that would require the use of a septic system or other alternative wastewater system. This issue will not be discussed further in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Impacts

- a) *Less than Significant Impact.* The proposed project would generate construction-related greenhouse gas (GHG) emissions, which could adversely affect global climate. During construction, GHGs would be emitted through operation of construction related equipment and from worker and vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Methane is also emitted during the fueling of heavy equipment. GHG emissions associated with the project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust. However, the proposed project will not include the provision of new permanent stationary or mobile sources of emissions. Therefore, the proposed project will not generate quantifiable GHG emissions from project operations. This impact is considered less than significant; however, the EIR will include a more detailed discussion of GHG emissions and climate change.

- b) *Less than Significant Impact.* The City of Placerville is subject to compliance with the Global Warming Solutions Act (Assembly Bill 32), which calls for a reduction in GHG emissions. The proposed project would reconstruct the intersection of Main Street and Cedar Ravine Road, realign Clay Street, and replace the Clay Street Bridge over Hangtown Creek. The proposed project is not expected to conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. This will be discussed further in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Impacts

- a) *Less than Significant Impact.* The proposed project would not include the routine transportation, use, or disposal of hazardous materials that could create a significant hazard to the public. Small amounts of hazardous materials (such as oil, fuel, and solvents) would be used during construction activities for minor equipment maintenance. All equipment fueling and major maintenance activities will be performed off-site. Any use of

hazardous materials would be in compliance with all applicable local, state, and federal standards associated with the handling of hazardous materials. This impact is considered less than significant, and will be discussed further in the EIR.

- b) *Less than Significant Impact.* Once construction of the proposed project is finished, the project would not create a significant hazard to the public or the environment. No refueling or major maintenance of construction equipment will be performed at the project site. The use and handling of hazardous materials during construction activities would occur in accordance with applicable federal, state, and local laws, including California Occupational Health and Safety Administration (Cal/OSHA) requirements. These actions would minimize the potential and extent of any minor spill, and impacts would be less than significant. This issue will be discussed further in the EIR.
- c) *Less than Significant Impact.* The project site is located within one-quarter mile of Sierra Elementary School. As discussed in a) and b) above, the project is not anticipated to result in the accidental release or routine use or transport of hazardous materials. Therefore, this impact is considered less than significant. This issue will be discussed further in the EIR.
- d) *Less than Significant Impact.* The site is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (California Department of Toxic Substances Control, 2007). Additionally, there are no known historical uses of the project site that would indicate the potential for a previously undiscovered hazard, such as buried fuel tanks or contamination from industrial operations. This impact is considered less than significant and will be further discussed in the EIR.
- e) *No Impact.* Although the proposed project site is located within two miles of a public use airport (Placerville Airport), the site is located outside the Airport Safety Zones as shown on the El Dorado County Airport Land Use Compatibility Plan (April 2013). Therefore, the project would not result in any safety hazards to those working in the project area during construction. No impact is anticipated and this issue will not be discussed further in the EIR.
- f) *No Impact.* The project site is not within the vicinity of a private airstrip, and therefore would not result in a safety hazard for people residing or working in the project area. No impact is anticipated and no further analysis of this issue is required in the EIR.
- g) *Less than Significant with Mitigation Incorporated.* During construction, there may be temporary impacts to emergency services due to lane closures or other construction activities. All construction activities would be coordinated with the El Dorado County Fire Protection District and the City of Placerville Police Department to ensure that emergency service would be maintained. This impact would be less than significant with mitigation incorporated, and this issue will be discussed further in the EIR.
- h) *Less than Significant Impact.* The proposed project is located in an urbanized area adjacent to areas covered by clusters of various types of trees and vegetation. The proposed project consists of the reconstruction of the Main Street/Cedar Ravine Road intersection, realignment of Clay Street, and replacement of the Clay Street Bridge and will not result in new development which would induce population growth in the area. Emergency access will be maintained throughout construction and in the event of a fire, the El Dorado County Fire Protection District would provide fire and emergency services to the project area. This impact is considered less than significant, and will be discussed further in the EIR.

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

Discussion of Impacts

- a) *Potentially Significant Impact.* Construction-related activities could expose soil to erosion during storm events, causing degradation of water quality. Construction of the proposed

- bridge replacement could also impact Hangtown Creek. These impacts are considered potentially significant and will be discussed further in the EIR.
- b) *No Impact.* The proposed project would not create the need for water supply other than temporary construction-related water needs. Therefore, there would be no impact and this issue will not be discussed further in the EIR.
 - c) *Less Than Significant Impact with Mitigation Measures Incorporated.* Reconstruction of the Main Street/Cedar Ravine Road intersection and the realignment of Clay Street are not expected to significantly alter drainage patterns in the project area. Construction for the Clay Street Bridge replacement may result in erosion into Hangtown Creek without erosion control measures in place. Therefore, the proposed project will require a construction-related Storm Water Pollution Prevention Plan (SWPPP), consistent with section 402 of the Clean Water Act. Construction activities will include implementation of Best Management Practices (BMPs) for stormwater runoff identified in the SWPPP. This impact is considered less than significant with the incorporation of mitigation measures and will be discussed further in the EIR.
 - d) *Less Than Significant Impact with Mitigation Measures Incorporated.* Please see the discussion in c). This would be considered a less than significant impact with the incorporation of mitigation measures and will be discussed further in the EIR.
 - e) *Less Than Significant Impact with Mitigation Measures Incorporated.* Please see the discussion in c). The increase of impervious surfaces primarily from an increased bridge width and increased width to Clay Street is insignificant. This impact will be discussed further in the EIR.
 - f) *Less Than Significant Impact with Mitigation Measures Incorporated.* The increase in impervious surfaces due to a wider Clay Street Bridge and realignment of Clay Street would be minimal. Vehicles traveling through the project site could introduce pollutants that would impact water quality. This impact is considered less than significant with the incorporation of mitigation measures and will be discussed further in the EIR.
 - g) *No Impact.* The project site is partially located within a 100-year flood zone. However, the proposed project will not result in the development of habitable structures or other development that would typically cause an increase in population that could be adversely affected. This issue will not be discussed further in the EIR.
 - h) *Less than Significant Impact.* The proposed project is partially located within a 100-year flood zone. The project components are not anticipated to impede or redirect flood flows. This impact is considered less than significant and will be discussed further in the EIR.
 - i) *No Impact.* The proposed project is not located within the vicinity of a levee or dam and does not include the development of habitable structures or other development that would typically cause an increase in population that would be exposed to dangers involving flooding. This impact will not be discussed further in the EIR.
 - j) *No Impact.* The project site is not located near the Pacific Ocean, nor is it near a large body of water or an area that would be affected by a seiche, tsunami, or mudflow. Implementation of the proposed project would result in no impact. This issue will not be discussed further in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Impacts

- a) *No Impact.* The proposed project involves the reconstruction of the Main Street/Cedar Ravine Road intersection, realignment of Clay Street, and replacement of the Clay Street Bridge over Hangtown Creek. The proposed project would not divide an established community. This issue will not be discussed further in the EIR.
- b) *Less than Significant Impact.* The proposed project would not conflict with any applicable land use plans, policies, or regulations of an agency with jurisdiction over the project. The City is prepared to mitigate loss of parking spaces resulting from the proposed project and has identified several locations that can be developed for no net loss of parking. The City of Placerville adopted the Main Street Streetscape Design Development Plan (2005) which calls for reconstruction of the Main Street/Cedar Ravine intersection to include Clay Street. This impact is less than significant and will be discussed further in the EIR.
- c) *No Impact.* El Dorado County’s Integrated Natural Resources Management Plan is a county-wide habitat conservation plan/natural community conservation plan. The project site is located within the Integrated Natural Resources Management Plan planning area; however this plan has not been adopted to date. As a result no conflict with an adopted habitat conservation plan or natural community conservation plan will occur. This issue will not be discussed further in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Impacts

a-b) No Impact. The project site is located in an urban, built-up area, which is not identified as having any mineral resources or significant deposits of a quality worth retaining. Therefore, development of the area would not impact any valued mineral resource in the region or locally important mineral resource. This impact will not be discussed further in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Impacts

- a) *Potentially Significant Impact.* The proposed project involves reconstruction of the Main Street/Cedar Ravine Road intersection, realignment of Clay Street, and replacement of the Clay Street Bridge over Hangtown Creek. Commercial land uses surround the project site and residential land uses exist within one-quarter mile of the project site. Construction of the proposed project could increase noise levels in the area, limited to the times of construction. This impact would be considered potentially significant and this issue will be discussed further in the EIR.
- b) *Potentially Significant Impact.* Please see discussion a) above. The construction activities may result in a temporary increase in groundborne vibration or noise in the project area. This is considered a potentially significant impact. Therefore, this impact will be further addressed in the EIR.
- c) *Less than Significant Impact.* The proposed project is not anticipated to increase the permanent ambient noise levels during operation as it involves the reconstruction of an existing intersection, realignment of an existing road, and replacement of an existing

bridge facility. The realignment of roadways will shift traffic closer to some land uses. This impact is considered less than significant and will be discussed further in the EIR.

- d) *Potentially Significant Impact.* A temporary or periodic increase in ambient noise levels is likely to occur during the construction phase of the proposed project. This is considered a potentially significant impact. Therefore, this impact will be addressed in the EIR.
- e) *No Impact.* The proposed project will not result in the development of habitable structures or other development that would typically cause an increase in population that could be adversely affected. The proposed project will not subject people to excessive noise caused by an airport. There would be no impact, and this issue will not be discussed further in the EIR.
- f) *No Impact.* The project site is not within the vicinity of a private airstrip, and therefore would not result in adverse noise levels to people residing or working in the project area. No impact is anticipated and no further analysis of this issue is required in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING. Would the project:				
a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Impacts

- a) *No Impact.* The proposed project does not include the construction of new homes or businesses, nor does it include the construction of new roadways which could induce growth. Given that the proposed project involves reconstruction of an existing intersection, realignment of an existing road, and replacement of an existing bridge facility, the project is not anticipated to induce growth. Therefore, this impact will not be discussed further in the EIR.
- b) *No Impact.* No residential structures would be displaced as a result of the proposed project as the project involves reconstruction of an existing intersection, and realignment of an existing road. This impact will not be readdressed in the EIR.
- c) *No Impact.* See Response b) above. No impacts are expected and this impact will not be readdressed in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. 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:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion of Impacts

a-b) *Less than Significant Impact.* The proposed project would reconstruct the Main Street/Cedar Ravine Road intersection, realign Clay Street, and replace the bridge over Hangtown Creek at Clay Street. The proposed project would not include residential or commercial components that would increase human presence in the area. During construction, there may be temporary impacts to emergency services due to lane closures or other construction activities. All construction activities would be coordinated with the El Dorado County Fire Protection District and the City of Placerville Police Department to ensure that emergency service would be maintained. Impacts to fire and police protection services would be less than significant and will be discussed further in the EIR.

c-d) *No Impact.* The proposed project does not include new development for habitation nor does it include development of new businesses. Therefore the proposed project would not induce population growth and furthermore, does not include any components that would result in an increased demand for schools or parks. Establishment of additional schools and park facilities to maintain acceptable service ratios for the public would not be necessary. Therefore, this issue will not be further addressed in the EIR.

e) *Less than Significant with Mitigation Incorporated.* The proposed project involves the realignment of Clay Street between US 50 and Main Street, which will result in a loss of parking within the Ivy House parking lot. The existing Clay Street alignment will be converted to parking, and the Ivy House parking lot will be split into two separate lots, with a net loss of parking of approximately 30 spaces. The proposed relocation for the Druid monument at the northwest corner of the reconstructed intersection at Clay Street and Main Street may further reduce the number of parking spaces in the Ivy House parking lot. The City of Placerville has identified various locations that can be developed to mitigate loss of parking and result in a no net loss of parking. Mitigation will reduce impacts to parking to a less than significant level. This issue will be discussed further in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Impacts

- a) *No Impact.* The project does not include a residential or commercial component that would increase demand for parks or recreation services or facilities. Therefore, there would be no need for additional facilities to maintain acceptable service ratios for parks and recreation services. This issue will not be discussed further in the EIR.
- b) *No Impact.* The proposed project involves the reconstruction of the Main Street/Cedar Ravine Road intersection, realignment of Clay Street, and replacement of the Clay Street Bridge over Hangtown Creek. This project does not involve any expansion of recreational facilities. This issue will not be discussed further in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Impacts

- a) *Less than Significant Impact.* The proposed project consists of reconstruction of an existing intersection, realignment of an existing roadway, and replacement of an existing bridge facility. The proposed project is anticipated to improve congestion within the project vicinity and would not conflict with any plan or program establishing measures of effectiveness for the performance of the circulation system or other standards established by the EL Dorado County Transportation Commission. During construction, there may be temporary impacts due to lane closures or other construction activities. Impacts are considered less than significant. This issue will be discussed further in the EIR.
- b) *No Impact.* The proposed project would improve traffic operations and reduce congestion in the project area with the realignment of Clay Street and reconstruction of

the intersection of Cedar Ravine Road, Clay Street, and Main Street. Funding for design and construction of the proposed project has been programmed from multiple federal, state, and local sources including El Dorado County Transportation Commission. The proposed project will not conflict with an applicable congestion management program. This issue will not be discussed further in the EIR.

- c) *No Impact.* This proposed project is located within two miles of Placerville Airport; however, project components are limited to public transportation facilities, which will not result in a change in air traffic levels. The proposed project would have no impact. This issue will not be discussed further in the EIR.
- d) *Less than Significant Impact.* The City of Placerville adopted the Main Street Streetscape Design Development Plan (2005) which calls for reconfiguration of the Main Street/Cedar Ravine Road intersection to include Clay Street. The proposed project does not include any design features that would be anticipated to increase hazards in the project area, nor does the proposed project include any incompatible uses. Furthermore, the proposed project would replace the bridge over Hangtown Creek at Clay Street, which is currently considered functionally obsolete. Impacts are considered less than significant and will be discussed further in the EIR.
- e) *Less than Significant Impact.* The proposed project involves the reconstruction of an existing intersection, realignment of an existing roadway, and the replacement of an existing bridge facility. During construction, there may be temporary impacts to emergency services due to lane closures or other construction activities. All construction activities would be coordinated with the El Dorado County Fire Protection District and the City of Placerville Police Department to ensure that emergency service would be maintained. This impact will be discussed further in the EIR.
- f) *Less than Significant Impact.* The City of Placerville Non-Motorized Transportation Plan (NMTP), adopted in 2005 and updated in 2010, sets forth goals, policies, strategies, and proposed improvements to existing facilities to address non-motorized transportation issues in the City. Map 4 in the NMTP identifies proposed Class III bike routes on Main Street, Cedar Ravine Road, and Clay Street. Although the proposed project does not include Class III bike routes along Main Street, Cedar Ravine Road, and Clay Street within the project area, the project would not prevent the establishment of Class III routes in the future. The City of Placerville Pedestrian Circulation Plan, adopted in 2007, expanded the sidewalk inventory of the NMTP. Within the project area, the Pedestrian Circulation Plan proposes new sidewalks along the east side of Cedar Ravine Road between Main Street and Thompson Way (City of Placerville 2007). The proposed project would not preclude the construction of the proposed sidewalks within the Pedestrian Circulation Plan. Impacts would be considered less than significant. This issue will be discussed further in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Impacts

- a) *No Impact.* The proposed project consists of reconstruction of an existing intersection, realignment of an existing roadway, and replacement of an existing bridge facility, and would not result in the need for wastewater treatment. Therefore, the project would not exceed any wastewater treatment requirements of the Regional Water Quality Control Board. This issue will not be discussed further in the EIR.
- b) *No Impact.* The proposed project will result in the placement of a new sewer line from the manhole on Main Street to a manhole on the south side of the creek near the northeast corner of the Ivy House parking lot. However, the proposed project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities. This issue will not be discussed further in the EIR.

- c) *No Impact.* Within the Hangtown Creek channel, a storm water drainage facility crosses under the Clay Street Bridge. The proposed project would not result in the construction of new storm water drainage facilities or expansion of existing facilities. This issue will not be discussed further in the EIR.
- d) *Less than Significant Impact.* Project water demand is limited to temporary construction needs and landscaping irrigation needs. These water requirements are not expected to result in the need for expanded entitlements, and the impact would be considered less than significant. This issue will not be discussed further in the EIR.
- e) *No Impact.* The proposed project will result in the placement of a new sewer line from the manhole on Main Street to a manhole on the south side of the creek near the northeast corner of the Ivy House parking lot. However, the proposed project would not require or result in the construction of wastewater treatment facilities or expansion of existing facilities. This issue will not be further discussed in the EIR.
- f) *Less than Significant Impact.* Solid waste generation would be limited to construction debris. The proposed project involves the reconstruction of the Main Street/Cedar Ravine Road intersection, realignment of Clay Street, and replacement of the Clay Street Bridge. The amount of waste material generated during construction of the proposed project is not anticipated to exceed the available landfill capacity, and impacts would be less than significant. This issue will not be discussed further in the EIR.
- g) *Less than Significant Impact.* The proposed project involves the reconstruction of the Main Street/Cedar Ravine Road intersection, realignment of Clay Street, and replacement of the Clay Street Bridge. Solid waste generation would be limited to construction debris and would be transferred to a landfill or other disposal center as required by local, state, and federal law. This impact would be less than significant, and this issue will not be discussed further in the EIR.

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

Discussion of Impacts

- a) *Potentially Significant Impact.* Implementation of the project could result in adverse impacts to plant and animal habitats, endangered species, and prehistoric resources. A detailed analysis of these potentially significant impacts will be included and discussed in the EIR.
- b) *Potentially Significant Impact.* The proposed project, along with other planned, proposed or approved projects may result in adverse cumulative impacts. An analysis will be included in the EIR discussing the project's cumulative contribution to environmental impacts in El Dorado County and the City of Placerville.
- c) *Potentially Significant Impact.* The EIR for the project will identify and analyze all potentially adverse environmental impacts resulting from project implementation. Additionally, the EIR will identify appropriate mitigation to reduce substantial impacts to less than significant levels where feasible.

REFERENCES

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- El Dorado County Transportation Commission. June 28, 2012. *El Dorado County Airport Land Use Compatibility Plan*. <http://www.edctc.org/2/Airports.html>
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- Sycamore Environmental Consultants. 2009. *Natural Environment Study and Jurisdictional Delineation Report (NES) for the Clay Street at Main Street/Cedar Ravine Realignment and Clay Street Bridge (25C-0117) at Hangtown Creek Replacement Project*".
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Edmund G. Brown Jr.
Governor

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



Ken Alex
Director

Notice of Preparation

August 11, 2014

To: Reviewing Agencies

Re: Clay Street Bridge Replacement and Realignment Project
SCH# 2014082024

Attached for your review and comment is the Notice of Preparation (NOP) for the Clay Street Bridge Replacement and Realignment Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Pierre Rivas
City of Placerville
3101 Center Street
Placerville, CA 95667

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

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AUG 14 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

**Document Details Report
State Clearinghouse Data Base**

SCH# 2014082024
Project Title Clay Street Bridge Replacement and Realignment Project
Lead Agency Placerville, City of

Type NOP Notice of Preparation
Description The Clay Street Bridge Replacement and Realignment Project proposes to replace the Clay Street over Hangtown Creek, realign Clay Street with Cedar Ravine Road at Main Street, and improve the intersection of Main Street and Cedar Ravine Road. The project proposes the following improvements: Replace the bridge over Hangtown Creek at Clay Street with a single-span cast-in-place conventionally reinforced slab bridge structure of 32 feet in length and approximately 46 feet in width. Realign Clay Street between US 50 and Main Street. Reconstruction the intersection of Main Street, Cedar Ravine Road and Clay Street.

Lead Agency Contact

Name Pierre Rivas
Agency City of Placerville
Phone 530 642 5569 **Fax**
email
Address 3101 Center Street
City Placerville **State** CA **Zip** 95667

Project Location

County El Dorado
City Placerville
Region
Cross Streets Clay Street/Main Street/Cedar Ravine Street
Lat / Long 38° 43' 44" N / 120° 47' 46" W
Parcel No. Multiple
Township 11N **Range** 11E **Section** 7/8 **Base** MDB&M

Proximity to:

Highways Hwy 50 & 49
Airports Placerville
Railways
Waterways Hangtown Creek, Weber Creek
Schools Sierra ES, El Dorado
Land Use Commercial Business District

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Department of Fish and Wildlife, Region 2; Native American Heritage Commission; Caltrans, Division of Transportation Planning; California Highway Patrol; Caltrans, District 3 S; Air Resources Board; Air Resources Board, Transportation Projects; Regional Water Quality Control Bd., Region 5 (Sacramento)

Date Received 08/11/2014 **Start of Review** 08/11/2014 **End of Review** 09/09/2014

Notice of Completion & Environmental Document Transmittal

2014082024

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Clay Street Bridge Replacement and Realignment Project

Lead Agency: City of Placerville

Contact Person: Pierre Rivas

Mailing Address: 3101 Center Street

Phone: 530-642-5569

City: Placerville

Zip: 95667

County: Placer

Project Location: County: El Dorado City/Nearest Community: Placerville

Cross Streets: Clay Street/Main Street/Cedar Ravine Street Zip Code: 95667

Longitude/Latitude (degrees, minutes and seconds): 38 ° 43 ' 44 " N / -120 ° 47 ' 46 " W Total Acres: _____

Assessor's Parcel No.: Multiple Section: 7 & 8 Twp.: 11N Range: 11E Base: MDB&M

Within 2 Miles: State Hwy #: 50 & 49 Waterways: Hangtown Creek, Weber Creek

Airports: Placerville Airport Railways: N/A Schools: Sierra Elementary, El Dorado

Document Type:

- CEQA: NOP Draft EIR Supplement/Subsequent EIR (Prior SCH No.) Mit Neg Dec
- NEPA: NOI EA Draft EIS FONSI
- Other: Joint Document Final Document Other: _____

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Local Action Type:

- General Plan Update Specific Plan Rezone Annexation
- General Plan Amendment Master Plan Prezone Redevelopment
- General Plan Element Planned Unit Development Use Permit Coastal Permit
- Community Plan Site Plan Land Division (Subdivision, etc.) Other: _____

STATE CLEARING HOUSE

Development Type:

- Residential: Units _____ Acres _____
- Office: Sq.ft. _____ Acres _____ Employees _____
- Commercial: Sq.ft. _____ Acres _____ Employees _____
- Industrial: Sq.ft. _____ Acres _____ Employees _____
- Educational: _____
- Recreational: _____
- Water Facilities: Type _____ MGD _____
- Transportation: Type Bridge Replacement/Realignment
- Mining: Mineral _____
- Power: Type _____ MW _____
- Waste Treatment: Type _____ MGD _____
- Hazardous Waste: Type _____
- Other: _____

Project Issues Discussed in Document:

- Aesthetic/Visual Fiscal Recreation/Parks Vegetation
- Agricultural Land Flood Plain/Flooding Schools/Universities Water Quality
- Air Quality Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
- Archeological/Historical Geologic/Seismic Sewer Capacity Wetland/Riparian
- Biological Resources Minerals Soil Erosion/Compaction/Grading Growth Inducement
- Coastal Zone Noise Solid Waste Land Use
- Drainage/Absorption Population/Housing Balance Toxic/Hazardous Cumulative Effects
- Economic/Jobs Public Services/Facilities Traffic/Circulation Other: _____

Present Land Use/Zoning/General Plan Designation:

Commercial Business District

Project Description: (please use a separate page if necessary)

The Clay Street Bridge Replacement and Realignment Project proposes to replace the Clay Street Bridge over Hangtown Creek, realign Clay Street with Cedar Ravine Road at Main Street, and improve the intersection of Main Street and Cedar Ravine Road. The project proposes the following improvements:

Replace the bridge over Hangtown Creek at Clay Street with a single-span cast-in-place conventionally reinforced slab bridge structure of 32 feet in length and approximately 46 feet in width.

Realign Clay Street between US 50 and Main Street.

Reconstruct the intersection of Main Street, Cedar Ravine Road and Clay Street



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

2 September 2014

Pierre Rivas
City of Placerville
3101 Center Street
Placerville, CA 95667

CERTIFIED MAIL
7014 1200 0000 7154 2468

COMMENTS TO NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, CLAY STREET BRIDGE REPLACEMENT AND REALIGNMENT PROJECT, SCH NO. 2014082024, EL DORADO COUNTY

Pursuant to the State Clearinghouse's 11 August 2014 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Notice of Preparation for the Draft Environmental Impact Report* for the Clay Street Bridge Replacement and Realignment Project, located in El Dorado County.

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

Construction Storm Water General Permit

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

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

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SEP 03 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

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

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

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

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

Clean Water Act Section 404 Permit

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

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

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

Clean Water Act Section 401 Permit – Water Quality Certification

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

Waste Discharge Requirements

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

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Low or 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 *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

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/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

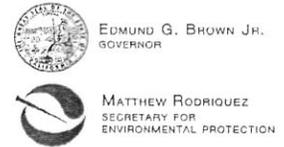
http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

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

A handwritten signature in black ink, appearing to read "Trevor Cleak". The signature is written in a cursive, flowing style.

Trevor Cleak
Environmental Scientist

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



Central Valley Regional Water Quality Control Board

RECEIVED

19 August 2014

AUG 21 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

Pierre Rivas
Development Services Department
City of Placerville
3101 Center Drive
Placerville, CA 95667

CERTIFIED MAIL

7013 1710 0002 3644 7204

**COMMENTS TO NOTICE OF PREPERATION TO THE ENVIRONMENTAL IMPACT REPORT,
CLAY STREET BRIDGE REPLACEMENT AND REALIGNMENT PROJECT, EL DORADO
COUNTY**

Pursuant to the City of Placerville, Development Services Department's 11 August 2014 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Notice of Preparation for the Environmental Impact Report* for the Clay Street Bridge Replacement and Realignment 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.

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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/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

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

A handwritten signature in cursive script, appearing to read "Trevor Cleak". The signature is written in dark ink and is positioned above the printed name and title.

Trevor Cleak
Environmental Scientist

**Native American Contacts
El Dorado County, California
August 13, 2014**

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This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed Clay Street Bridge Replacement and Realignment Project; located in the city of Placerville; El Dorado County, California.

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El Dorado County, California
August 13, 2014**

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Colfax , CA 95713 Konkow
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**Native American Contacts
El Dorado County, California
August 13, 2014**

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Maidu

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This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed Clay Street Bridge Replacement and Realignment Project; located in the city of Placerville; El Dorado County, California.

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

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov



October 14, 2010

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

- sent via email and United States Postal Services -

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

Dear Mr. Pesses:

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

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

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

Randy Pesses
Page 2

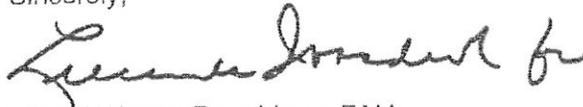
We strongly advise the City to properly evaluate the potential significance of the bridge and adopt feasible mitigation measures which avoid or reduce all adverse impacts to the potential historical resource.

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

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

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

Sincerely,



Milford Wayne Donaldson, FAIA
State Historic Preservation Officer



August 14, 2014

City of Placerville
Attn.: Pierre Rivas
3101 Center Street
Placerville, CA 95667

Response to Notice of Preparation of Environmental Impact Report (EIR) for the Clay Street Bridge Replacement and Realignment Project

Dear Mr. Rivas;

El Dorado Transit appreciates the opportunity to review and comment on the Notice of Preparation of an Environmental Impact Report for the Clay Street Bridge Replacement and Realignment Project released on August 11, 2014.

After review of the Environmental Impact Report (EIR) for the Clay Street Bridge Replacement and Realignment Project it should be noted that, under sections XIV PUBLIC SERVICES and XVI TRANSPORTATION/TRAFFIC, it is stated that there may be temporary impacts due to lane closures or other construction activities. Impacts are considered less than significant.

While the effects may be less than significant due to duration, they may create significant service delays to El Dorado Transit. There are currently four (4) weekday routes (Placerville East/West and Pollock Pines East/West) and one (1) weekend route (Saturday Express) which operate on one or more of the effected roadways.

Based on the potential service delays, El Dorado Transit requests to be included for mandatory notification of lane closures or construction activities. This pre-activity notification is essential for the ongoing daily operations of local public transit services.

El Dorado Transit thanks you for your attention in this matter. Should you have any questions regarding this response, please feel free to contact me at 530-642-5383 x 201 or via email at rvanvalkenburgh@eldoradotransit.com.

Sincerely,

Robin Van Valkenburgh
Planning and Marketing Manager
El Dorado County Transit Authority

Cc: Mindy Jackson

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AUG 18 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

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SEP 9 2014 LH H

Vicki Clark

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

2640 Morrene

Dr

Placerville, CA 95667

City of Placerville,

Pierre Rivas,

Clay Street Bridge Replacement and Realignment Project:

I have been against this project from day one. For reasons that have been repeated many times over the past few years.

It will ruin the historic nature and small town feel of Placerville's Historic District. I have spoken to many of our local residents over the years. The public is not properly notified of upcoming projects. Once the council approves something it then comes up years later and there are people that do not agree with the decisions made many years ago.

When future growth of the city, tax revenue, and economic development are discussed the city residents, the ones that just like to live as a resident in a small town, need to be taken into consideration. The only things that seem to be considered are projects that will bring in tax revenue. The amount of residents is much larger than the businesses in the City limits. Business and development put a lot of money and time into what they would like to see here, for their profit. They have the time, full time. Residents are not able to spend that sort of time or money, they have jobs, families, and other household responsibilities.

When will the need for more and more tax revenue come to an end? The more development the more revenue for schools, roads, streets, police, fire dept, and city services in general. Does it stop when every inch of vacant land is full? What about the quality of life and the health of the citizens?

I continue to find projects that seem to come out of nowhere. Examples; Roundabouts, Streetscapes, Placerville Drive projects. When public hearings are done so long ago you will find people who disagree with plans made years prior by other City Councils. I feel a public hearing in 2005 was much too long ago for current residents to have a say in what will happen to the city they live in.

There are people that have moved here within that time frame. Prior to the planned Roundabouts, Streetscape and Placerville Drive projects and the public hearings for these projects.

There are individuals that were not old enough to vote, that grew up in Placerville, or were aware of the proposed changes when all of these plans were made. All of these projects should be on the cities web page. (A designated location). There needs to be a revisit of each major project if the public hearing is more than three years old. The city has an ongoing list of planned future projects for residential and commercial buildings on the Cities web page.

Our Historic District continues to get smaller, from both ends of the Historic District. The Roundabout at Clay and Cedar Ravine will bring in massive amounts of traffic to Main St. It is difficult to drive down Main Street in the late morning or early afternoon. Let alone on a Sunday afternoon. Now we want to route more cars through that area? The pollution from the additional traffic will be an issue along with noise the erosion of the small town atmosphere of Placerville

Placerville's History cannot be replaced once it is gone.

I would also like the city to do their own research on the safety of roundabouts. I have found several articles stating that they are not as safe as some think they are.

Thank you,
Vicki Clark

Susan A. Rodman
3187 Big Cut Road
Placerville, CA 95667

September 3, 2014

City of Placerville
ATTN: Pierre Rivas
3101 Center Street
Placerville, CA 95667

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SEP 03 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

Subject: Comments on the Notice of Preparation for:
EIR for the Clay St. Bridge Replacement and Realignment Project

The project proposal and its accompanying Notice of Preparation, Project Description, and Environmental Checklist disclosure are incomplete and do not meet the legal requirements for CEQA compliance.

As a side note: on page 7 it would improve clarity for the Alternative descriptions numbers to match their headings. Heading Alternative 1 description begins "Alternative 2 will" etc. for the rest.

The range of alternatives addresses only 3 alternatives and does not include several alternatives that have been brought forward by the public during public discussion at City Council meetings or Community Chats sponsored by the City of Placerville. These alternatives have not been included for analysis or explained as to rationale for dismissal for further analysis. This fails to meet CEQA regulations for analysis of a full range of reasonable alternatives or disclosure to the public for dismissal of alternatives for consideration and full analysis. Some of these alternatives are:

- Retain the existing Clay St. alignment, allow only a right-hand turn onto Main St. from Clay St, and place a No Left Turn sign at the Main-Clay St intersection to prevent left-hand turns onto Clay from Main St. This would relieve the traffic congestion at Main & Clay St, improve pedestrian safety, and reduce air pollution from engine exhaust from vehicles tying up traffic waiting to turn left. There is adequate egress from the Cottonwood subdivision and adjacent areas provided by the new, improved Clay Street that connects to Mosquito Road at the bus terminal with access either to Main St or to US 50. This Alternative could be done without bridge replacement, and would be at significantly lower cost to the City and taxpayers.
- Same as above, but with bridge replacement to meet current standards for 100 year flows, on the current alignment, etc. While this alternative would impact Clay St. traffic during construction, the impacts to the Hangtown Creek and adjacent riparian areas are likely to be reduced.

- Close Clay St to 2-way traffic, make it a one-way street, with no left turn from Main St. Traffic can have adequate access from Mosquito Road, as described above. This would allow a much smaller bridge replacement, at a much reduced cost to the City & taxpayers.
- Close Clay St. to all automobile traffic, leave it for bicycle and foot traffic only. Access for autos would be from Mosquito Rd, no need for any realignment or bridge replacement. Lowest cost alternative. This would also improve bicycle and pedestrian safety, even given the railing height.

Project Description & Environmental Checklist: The project description and environmental checklist are incomplete and inadequate to disclose the full scope or effects of the project. This also violates CEQA regulations. Some of the items not disclosed include:

- The Cedar Ravine Creek culvert/tunnel runs directly under the proposed realignment, and this culvert/tunnel starts from an open creek at the Judge Thompson House South of Pacific St, runs under Pacific St. at the Junction with Cedar Ravine Rd, continues under Main St, across the current Ivy House parking lot (on the proposed realignment) to a confluence with Hangtown Creek built into, and part of, the Clay St. bridge. This culvert/tunnel is essentially an extensive bridge over Cedar Ravine Creek that extends through the entire project area, but it is never mentioned in the project description or the environmental checklist. If the Clay St bridge is “substandard and functionally obsolete”, it would logically follow that the Cedar Ravine structure of hand-stacked stone and timbers does not meet current design or safety standards. The potential for failure of this structure over Cedar Ravine Creek is clearly illustrated by sinking pavement at the entrance to the Ivy House Parking Lot, Main St. at the intersection, and in Pacific St. at the Junction with Cedar Ravine Rd. This clearly connected stream and bridge structure is ignored in the entire NOP, out of compliance with CEQA.
- This reconstructed intersection would be the largest single intersection in all of Placerville. No mention of this is made, although it will significantly change the look and aesthetics of this area of the City, to the detriment of historical aesthetics. While not all of the buildings and structures in this area are historic, the atmosphere of history is still maintained under current conditions. This intersection would be yet another blow to maintaining a historic atmosphere as the “Welcome to Old Hangtown” experienced at this intersection where people exiting from Mosquito Road/Broadway US 50 exit enter what appears currently to be the beginning of “Old Hangtown” coming from East to West. This existing intersection changes the character of the travel way and alerts travelers that they are at a transition point in the City. It alerts people to look for places to exit their vehicles and enjoy the historic atmosphere of Placerville.
- The project description and environmental checklist fail to disclose the scope of change in proportions of constructed structures from the existing condition. A road within a historic setting should maintain the setting and be in proportion with other existing structures. This much larger (aprox. 2 ½ wider) bridge and widened street will be glaringly out of proportion to

the surrounding buildings and have a significant negative impact to the existing visual character and setting. The fact the Aesthetics are not considered a potentially affected for consideration in the Environmental Checklist shows a lack of adequate analysis and is a blatant disregard of citizen input in this entire project. It is all about Aesthetics!

- Biological Resources: There are trout in Hangtown Creek, and frog habitat is clearly evident. However, adequate construction mitigations are available to bring effects to less than significant. I see no problems evident in this section.
- Cultural Resources: relocation of the Druid Monument could be a positive effect IF it has protection from vandalism and greater accessibility – two-edged sword here, and vandalism protection is not mentioned. Relocation of the Druid Monument would also provide easier access for emergency vehicles and trucks going onto Cedar Ravine Rd. This is a consideration for the major access route to Marshall Hospital.
- Public Services & Utilities: No mention is made of the effects to water and sewer connections that would be affected by the project. Disclosure of these facilities and their treatment by this project must be included. There are also storm drains in proximity to the Clay St. Bridge, and no mention of their treatment is given either. The NOP is inadequate in disclosure for public services.
- Greenhouse Gas & Air Quality: I lumped these as related, and comments would be the same for both. Let's get real here. With US 50 in such close proximity, and prevailing west-to-east winds bringing Sacramento smog to Placerville, there is no measurable impact from ANY alternative of this project. Any reduction of emissions at this intersection would only transfer to the Bedford/Main St and Pacific/Cedar Ravine intersections. Instead of potentially significant impacts. these impacts would only be a slight location shift.
- However, Land Use Planning and Population/Housing are not on the checklist. This project does have an effect, a potentially significant effect, for what CEQA calls "Growth Inducing Effects". This is also not disclosed in any part of the NOP. Currently, there is vacant land North of US 50 that would have increased access from this project and become much more economically viable for housing development – which would certainly increase traffic, greenhouse gasses, and reduce air quality. This project has the potential to benefit these land owners with the use of taxpayer funds by this project. The small amount of funds held from the Cottonwood project are not in any way sufficient to offset the costs of the project.
- Hydrology/Water Quality is inadequately addressed, most glaringly due to the omission of any discussion of Cedar Ravine Creek, its confluence with Hangtown Creek or its bridge/culvert/tunnel structure directly in the project area. This is a major failing of the NOP. The hydrology impact analysis must address both watersheds, and address the connectivity of these watersheds. Both watersheds have inadequate bridge structures all along their stream courses upstream of the project area, and in the case of Hangtown Creek, there are structures

Comments in response to NOP for Clay St. Bridge Replacement & Realignment Project
From Susan A. Rodman

inadequate for 100 year storm flows downstream as well. If the Clay St. Bridge is inadequate to pass a 100 year storm event, so are all of the upstream bridges and over-stream structures from at least Mosquito Road; including: the bridge over mosquito road, the bridge behind Main St. Auto, the Bridge at Locust St., the culvert/tunnel/bridge at the Mid-Town Mall, and the Independent building. Most, if not all, of these have greater debris piles and less clearance than the Clay St. Bridge.

In Summary, the NOP fails to comply with CEQA regulations and fails to address several potentially significant negative effects. The comments submitted are my own, from personal knowledge of potential environmental effects and observation of the project site. I find this NOP inadequate and generic, it fails to address a number effects that would be expected for this project at this site. It fails the CEQA criteria to address site-specific concerns and effects. In addition, no mention is made of the fact that this project would use Federal funds, and as such, is also subject to NEPA. There must be a corresponding NEPA document, which is referenced only as part of a Caltrans "encroachment permit, NEPA clearance". The CEQA analysis must include the NEPA findings and where those can be found by the public.

A handwritten signature in cursive script that reads "Susan A. Rodman". The signature is written in black ink and is positioned above the typed name.

Susan A. Rodman, Placerville Resident

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SEP 08 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

Stanley W. Morris
Historic Cary House Hotel
300 Main Street
Placerville, Ca 95667

September 8, 2014

City of Placerville
Attn.: Pierre Rivas
3101 Center Street
Placerville, CA 95667

Subject: Environmental Impact Report, Clay Street Bridge Replacement/Realignment Project

Dear Mr. Rivas,

Please accept my comment below regarding the NOP that has been issued for the proposed Clay Street Bridge R&R project. This submission is framed in a journalistic style that attempts to portray the character and ambience found within and near the project's boundaries and to explain why there appears to be increasing resistance to the proposal. These observations are based on my informal survey, over several years, of the historical and cultural assets to be found and appreciated, by locals as well as our many tourists, upon exploring this heritage site:

When for the first time you happen upon the intersection of Main Street and Cedar Ravine Road, you are soon struck by the feeling that you have entered a place of special significance, a place like no other, a location of historical worth, an area rich in community... and thriving.

Formed over 150 years ago at an acute bend in the road leading to the City of Placerville's central business district, and located at the confluence of Cedar Ravine and Hangtown Creeks, this is where, in 1849, California Gold Rush miners panned the first million dollars worth of gold at a small mining camp then known as Dry Diggings.

Standing boldly in the middle of this crossroads, nearly 30 feet high and 10 feet wide, resembling a torch of ages, is the Druidic monument honoring P.N.G.A. (Past National Grand Arch) Frederick Sieg. In 1858, California Grove No. 1 of Druids was established in Placerville under the leadership of its founder Sieg. The Druid Monument was dedicated in 1926 at the intersection of Cedar Ravine and Main Street. On the side of the stone pillar is an emblem which is a 'flaming pyre' surmounted by a crossed spear and long-handled sickle, oaks, mistletoe, a daffodil and the all-seeing eye in a triangle. And atop the tall, stone column, glowing as a beacon through the night, stands an ornate, stained glass flame, never to be extinguished 'till dawn.

I must ask myself, over and over again, is it possible that the monument's "placement," in the middle of the crossroads, is even more significant than the monument itself?

Lacking the monotonous modernization you might find in most other cities, this unusual intersection of three streets pulls-you-in and captures your curiosity. This is a uniqueness not found just anywhere. A few yards to the west enters original Clay Street, interrupting it is the Clay Street Bridge spanning two merging creeks, nearby is the site of the Historic Ivy House, another monument of stone commemorates the location. And behind it all, set adjacent to Hangtown Creek, you will find a small park with the only handicap-accessible access for close-up viewing of the rocky bed of waters running along Main Street, once so rich in precious metals and centered within the largest migration in the world, *the California Gold Rush*.

For all its charm and complexity, this odd intersection of three historic roads actually works. Traffic studies will bear-out that few serious collisions have occurred at the intersection, the traffic flow is normally light, and it provides easy crossing for pedestrians, who on Saturday mornings in the summer visit the local Farmer's Market. Set-up in the adjacent Ivy House parking lot, a corner lot, the market has a prime location, the envy of any business. Will the market, delivering our local farmer's produce, be able to sustain its present sales status, if it is relocated?

People gather at the surrounding cafes and restaurants, one of which is housed in the 1859 stone building of John Pearson's Soda Works, others in pre-1930s wood structures, also of historical significance. All-in-all, this is a quiet, peaceful location, a heritage site so rich in Placerville's history, community and diversity!

Main Street and Cedar Ravine, Placerville, California.

Thank you Mr. Rivas for this opportunity to submit commentary on the 'Clay Street Bridge Replacement and Realignment Project.' As you have always been willing to listen and consider my comments on proposals and projects in the past, I have trust that you will again give the same attention and consideration to this instance.

Sincerely,

Stanley W. Morris
Independent Journalism
Historical and Cultural Preservation

Sept. 8, 2014
Page 1 of 3

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CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

From: Robyn Rawers
Seasons Bed & Breakfast (530) 626-4420
2934 Bedford Ave., Placerville, Calif. 95667

To: Pierre Rivas
City of Placerville
3101 Center St., Placerville, Calif. 95667

Re: Clay St. Bridge project

The following objections have been stated by me numerous times at City Council meetings since 2006 with regards specifically to Clay Street Bridge. The current proposed project of enlarging the bridge would have an increased negative effect to Bedford Ave. where I reside and have a business that depends on tranquility.

The negative effects to my property are:

1. Increasing traffic from Hwy 50 to Clay to Bedford to Hwy 49 which cars from the east use as a "SHORT CUT"

2. Increased traffic increases noise especially on weekends where my business of holding weddings on the property is negatively effected.

3. Bedford, Lincoln, Coleman Streets were not designed to handle increased short cut traffic especially during weddings when the streets are packed with parked cars. These are tiny residential streets and not designed for volume. Guests are walking on Bedford Ave. in the street as there are no sidewalks and there have been close-calls with volume "short cut cars" and guests in the streets going to weddings. Shakespeare Club also has weddings. Both businesses have up to 100-200 guests visiting the properties on Friday, Saturday, and Sundays for events.

4. The streets are not being repaired from present over volume traffic especially where Coleman meets Bedford.

A 30-plus year resident Bart Quigley who lives across from me at the Seasons B&B has watched and verified that when Hwy 50 is backed up, a non-stop stream of cars use Clay Street to Bedford to Spring to get to Hwy 49. This has been going on for years. Obviously making Clay Bridge larger and adding Cedar Ravine traffic to get to Hwy 49 using Bedford only aggravates an already awful situation.

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CITY OF PLACERVILLE
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Page 2 of 3
Robyn Rawers

There cannot be an accurate traffic study unless a car count is done when Hwy 50 from Tahoe is backed up. This is not a study conducted by saying every weekend a count will be done from 3-6pm. Hwy 50 backs up during accidents, during Apple Hill events during the week, Christmas tree sell outs, Passport weekend events, winery events during the week, construction events, when boats are loaded and unloaded during spring and late fall at Tahoe (many cars which use Bedford Ave. as a short cut trailer boats behind), during holiday events, just a few examples. One time my mom and I were sitting on my porch and counted 35 non-stop cars from Coleman to Bedford in one 15 minute sitting. That day over 250 cars passed by my property and went to Spring St. which I can view from my porch. By the way, cars getting off the Bedford exit go directly to Spring without using Bedford Ave. The volume of cars counted that day came from Clay to Coleman (and Lincoln) to Bedford.

The other objections I have to the proposed project are:

1. That it was verbally promised to residents and business owners that just repairing the bridge would be discussed and not the present project. So far this discussion has not been done. More than 800 residents who signed the petition against the roundabout were also against realignment of Clay and enlarging of the bridge. The City Council is ignoring this connection and these signers were against the project IN TOTAL. It is well known to those that signed that they were against the project in total and easy for the City Council to take a survey to verify this. Instead of spending thousands of dollars in consultants, just survey those 800 signers to discover if indeed the majority are against the project in total including the enlarging of Clay St. bridge and realignment with Cedar Ravine. I suggest the City Council spend a small amount of money doing this.

2. That the verbal and in writing historical significance of the bridge as presented by our historical committee headed by Charlene Macasline has been ignored. This bridge is not dangerous and there has been no effort by the City to remove tree/shrub growth under the bridge to remedy any concerns of water flow. As was stated by the City, they are only interested in getting (in their words) "free money". This sentiment goes against the best interests of the business community who wants to maintain the historical nature of the bridge and it's "smallness" consistent with an old town feel. There are more pressing dangerous projects which should

Page 3 of 3
Robyn Rawers

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CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

be addressed that aren't because there is no "free money" attached. I verbally challenged the City about the use of the words "free money" and stated that it is our tax dollars which are not free.

3. That the farmers market would be negatively affected and is a great source of revenue and a featured attraction to visitors to Placerville.
4. That the parking spaces removed by this project has a negative effect to visitors who wish to shop and also visit the museum on Main Street.
5. That there might be a conflict of interest as this project increases value to property held by members of City Council and that is in part the push for the project over the objections of business owners and residents. Most of the previous voting moving this project forward was voted on by the previous Mayor who was convicted of a felony related to this project. Without that push by the previous Mayor, this project would not be before us today.
6. Construction on this project (however short) would severely and perhaps permanently damage the businesses surrounding the project.

In conclusion, I request that the City stop this project of enlarging Clay St. Bridge and the realignment with Cedar Ravine. I ask that a proper objective survey of the 800 plus resident signers of the anti-roundabout petition be done and results included in any report. That a proper traffic study be conducted if at all possible, that would include the variety of situations when Hwy 50 is backed up and Clay is used as the short cut and the projected increase of noise, traffic, dust, road damage be accounted for and financially calculated.

Thank you for your time to this most critical matter.



Robyn Rawers
owner of Seasons B&B

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PROVENCHER & FLATT, LLP
823 Sonoma Ave. Santa Rosa, CA 95404
Phone: 707-284.2380 Fax: 707-284.2387

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

ATTORNEYS AT LAW
Douglas B. Provencher
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OF COUNSEL
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Roz Bateman Smith

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Phone: (530) 622-2144
Fax: (530) 622-6601
Email: szito@cityofplacerville.org

Via US Fax and Email

Sept 8, 2014

RE: Initial Study for the Clay Street Bridge Replacement and Realignment Project

Dear Mr. Rivas,

On behalf of Friends of Historic Hangtown, a public benefit unincorporated association of numerous Placerville business owners and residents, formed for the purpose of protecting Placerville's environmental resources, thank you for the opportunity to comment on the Initial Study prepared for the "Clay Street Bridge Replacement and Realignment Project." ("Project" hereafter.)

This Project is subject to the Order, Judgment and Writ issued by Judge Nelson K. Brooks on February 14, 2012 for the El Dorado Superior Court Case, *Friends of Historic Hangtown v. City of Placerville*, Case No. 20110145, in which the Court ruled in favor of Friends of Historic Hangtown regarding the lack of adequate environmental review conducted for the "Clay Street/ Cedar Ravine Realignment and Clay Street Bridge at Hangtown Creek Replacement Project." (Attached as Exhibits A-C: Decision, Judgment, and Writ.)

The Court required the City to rescind its project approvals and prepare an EIR that would review several specific environmental impacts, prior to any consideration of future projects. (Exhibit A-C.) The proposed Project, which includes the installation of a 4-way stop instead of a roundabout, constitutes a revision of the project considered in 2011 and is therefore subject to the 2012 Order, Judgment and Writ. The Project proposes the realignment of Clay Street and Cedar Ravine, removal of the Clay Street Bridge and relocation of the Druid Monument, just as the prior roundabout project did.

The potential impacts of the revised Project, with the exception of the roundabout's safety impacts, are substantially similar to those: (1) expounded in the letters and comments submitted to the City during the consideration of the previous

Letter to City of Placerville from Friends of Historic Hangtown re Initial Study prepared for the Clay Street Bridge Replacement and Realignment Project
September 9, 2014

project; (2) outlined in Petitioner's briefs that were submitted to the court during the superior court litigation; and (3) explicated in the Order, Judgment and Writ. (Included here by reference.)

The court found that the City must prepare an EIR that adequately considers the following impacts: "Traffic, Parking, Urban Decay, Biological, Cultural Resource, Toxic, Aesthetic, Growth Inducing, and Inconsistencies with Area Plans and Policies.

Whereas, in the current Initial Study (IS), the City's list of impacts does not include all of the impact areas required by the Court. The IS impact list consists of the following: Biological Resources, GHG, Cultural Resources, Hazards & Hazardous Materials, Air Quality, Geology/Soils, Hydrology/Water Quality, Noise, and Mandatory Findings of Significance. The IS fails to consider Aesthetics, Inconsistencies with Land Use and Planning Plans and Policies, Transportation and Traffic, Parking (as it relates to traffic impacts and urban decay), all historic resources proximate to the Project, and the secondary but foreseeable impacts of potential Urban Decay. The Initial Study must therefore be revised and circulated for publication, consistent with the Order, Judgment and Writ.

Furthermore, the City may not base their new analysis on any of the studies relied upon in the old mitigated negative declaration that supported a finding of no impact for the roundabout project; the City must prepare new studies that adequately take into account every issue in which a fair argument of impacts was supported, pursuant to the Judgment and Writ, outlined above.

At the outset, the City has not sufficiently explained what problem they are trying to solve with the installation of the four-way stop, realignment of streets, removal of the historic clay street bridge and relocation of the historic Druid monument. The City claims in the project description that the project will "improve" this intersection, and that Main Street is "frequently congested." Resident Dale Pierce notes in his recent letter to the City, "As someone who uses this intersection multiple times every day, I do not find this to be true." Past studies also fail to reflect the economic changes that have reduced projected traffic growth in the downtown area. The City cites to no recent traffic studies to support their assertion that Main Street is frequently congested. The "No Project" alternative analysis will therefore be particularly relevant to the discussion and should be fully vetted.

Aesthetic Impacts

Pursuant to the Court's decision, the IS must be amended to include impacts to visual resources. These impact include review of the removal of the overlook, trees and shrubs, and historic bridge, and consideration of impacts to views from scenic Highway 50 as well as the view from El Dorado Trail.

Traffic

Pursuant to the Court's decision, the EIR must perform a full traffic study and analysis. The IS claims that this project has no traffic impacts outside the project area, as it is only a reconstruction and realignment of an existing intersection. However, it is specifically

designed to increase the capacity of Clay Street, and as such will bring increased traffic to Main Street and increased impacts at Main and Bedford. Again, there is a lack of recent traffic studies that include this and other proximate intersections. The Pacific Street at Cedar Ravine are already above capacity and unable to accommodate increased traffic. The Evaluation of Environmental Impacts requires consideration of off-site, cumulative, indirect and operational impacts.

Parking

Pursuant to the Court's decision, the City must analyze the loss and replacement locations of City parking. The City has acknowledged that traffic impacts due to the demolition of the downtown Ivy House lot is considered a significant environmental impact requiring mitigation. As noted, the EIR should discuss this impact in relation to traffic and urban decay impacts, propose appropriate mitigation and review Alternatives to the Project that substantially lessen these impacts.

Growth Inducing Impacts

Pursuant to the Court's decision the EIR must analyze growth inducing impacts. The City has made statements in the record that similarly proposed projects will stimulate increased growth to facilitate service to the undeveloped parcels adjacent to Clay Street. The City must analyze the growth inducing impacts of increasing the capacity of Clay Street for the benefit of those properties.

Urban Decay

Pursuant to the Court's decision, the IS must be amended to consider direct and indirect impacts of urban decay caused by the proposed Project. Here, economic and social effects result from a physical change in the environment *via* 1) construction activities of the road realignment and new bridge, and demolition of the Hangtown bridge that shut down or limit access to the downtown area; removal of prime parking in the downtown; locating replacement parking locations further away from downtown; and, interrupting the historic character of adjacent historic commercial and residential districts. The City has acknowledged the serious potential impacts on area traffic due to the extended period of time it will take to demolish the existing roadways and bridge, construct the realignment, and the proposed bridge. Area residents, business owners, City staff, City Councilmembers, the City Mayor, and the El Dorado Chamber of Commerce all recounted their experience that very severe traffic impacts occurred during the last road construction project, the Main Street Overlay Project and the Highway 50 Improvement Project, severely impeding downtown business. The EIR must discuss these issues and propose appropriate mitigation and review Alternatives to the Project that substantially lessen these impacts, pursuant to the Court's decision.

Historic Impacts

Impacts to all of Placerville's historic resources proximate to the Project must be considered in the EIR, pursuant to the Court's decision. Aside from the Druid Monument these include the Hangtown Bridge, a portion of the Lincoln Highway, the 1905 Hangtown Creek Retaining Wall, and new construction adjacent to known historic buildings in the downtown area.

Milford Wayne Donaldson, State Preservation Officer for the California Office of Historic Preservation, wrote to the City stating there is no indication in that the possible significance of the bridge has been addressed. Jennifer M. Gates, Field Services Director, California Preservation Foundation in partnership with the National Trust for Historic Preservation, concurred. Gates recommended that a study be undertaken to provide factual evidence determining the eligibility of the bridge at a local level by a qualified historian. Donaldson stated, "We strongly advise the City to properly evaluate the potential significance of the bridge and adopt feasible mitigation measures which avoid or reduce all adverse impact to the potential historical resource."

Resident, Sharlene McCaslin, has submitted extensive evidence, post dating the Caltrans study, and establishing the bridge's local significance. The Clay Street Bridge is characterized as "functionally obsolete," simply due to one factor, the narrowness of the structure, and is not considered "structurally deficient." A functionally obsolete bridge is one that was built to standards that are not used today. These bridges are not automatically rated as structurally deficient, nor are they inherently unsafe. Functionally obsolete bridges are those that do not have adequate lane widths, shoulder widths, or vertical clearances to serve current traffic demand, or those that may be occasionally flooded. This does not render them unfit for adaptive reuse, such as restoring the bridge as a pedestrian footbridge.

Numerous longtime local business owners and community members also attested to the bridge's local significance.

- Resident Robyn Rawers stated, "This project will destroy the last historic bridge over Hangtown Creek.... The bridge is now 70 years old and it should be considered priceless." "... I really take offense at seeing a bridge be called functionally obsolete. This is a historic bridge. It's one of a kind. It adds to the quaintness of the City." Rawer noted that Blair House is located right there next to the bridge. James and Erla Blair were living there in the home, he built it for his wife, on Clay Street around—shortly after the Clay Street bridge was built."
- Resident Sue Taylor stated, "I've come before [you] here about the Placerville's heritage assets. You know, I keep saying, this is your goldmine. The Placerville people come here because of the historic assets that you have and a roundabout doesn't, in my mind, fit into that heritage asset."
- Resident Cierra Baumunk asked, "Why remove a 70-year old bridge if it has purpose? I would tell you that obsolete is another word for old fashioned and I agree with that. Isn't that why locals and tourists love our town, because it is old fashioned?"
- Resident David Price said "...we're going to destroy the character of Placerville ..."
- Resident Lisa Collins stated "You know Placerville is such a charming historical town and I really would hate to see us lose that integrity."

Lincoln Highway

The City has acknowledged that the Lincoln Highway/Central Overland Stage/Pony Express routes followed the portion of Main Street within the current

Letter to City of Placerville from Friends of Historic Hangtown re Initial Study prepared for the Clay Street Bridge Replacement and Realignment Project
September 9, 2014

project area. The Lincoln Highway was constructed as a 12-foot wide concrete road and portions of the concrete underlay Main Street. This historic resource must be included in the EIR's review.

1905 Hangtown Creek Retaining Wall

There is a 1905 historic retaining wall in Hangtown Creek at the location proposed for the new bridge. It was recently acknowledged in the Draft EIR prepared for the Placerville Redevelopment project. The location of the retaining wall is not known, and it has yet to be evaluated in relationship to this Project. This historic resource must be included in the EIR's review.

Druid Monument

The California Preservation Foundation recommended the City incorporate mitigation measures into the construction specifications to ensure the National Register eligible Druid monument retains its historic significance during the relocation.

Consistency with Area Plans and Policies

Pursuant to the Court's decision, the Project's consistency with area plans and policies must be discussed in the EIR. The Main Street Streetscape Design Development, adopted in 2006, and the Placerville General Plan, adopted in 2004 are two such plans that must be discussed in the EIR. Some relevant plan provisions are as follows:

- Main Street Streetscape Design Development, January 2006. This plan focuses on three primary objectives as it provides detail for implementation of the Community's vision of the streetscape improvements: 1. Preserve and enhance the historical character and assets of Downtown; 2. Improve the pedestrian shopping experience; 3. Develop a plan that is aesthetically cohesive and economically viable, a plan that can be implemented through a multi-phase and multi-year effort.
- The Main Street Streetscape Design Development plan also provides "Placerville is surrounded by significant California history. The Gold Rush is chief among the prominent historic events and it offers an excellent opportunity to blend the streetscape concept with the historic flavor that will create a 'Placerville History Walk' along Main Street."
- General Plan-Land Use, Goal F: To provide for a land use pattern that protects and enhances Placerville's natural, open space, cultural, and scenic resources. (General Plan, pg. 25.)
 - Section VII — Community Design. Community design provides a strong, pleasant "sense of place" and local identity through harmonious composition of physical elements such as its foothill environment, small-town rural atmosphere, vistas, focal points of interest, landmarks, historic downtown, streetscapes, and many residential neighborhoods each of which has a character of its own.
- The overall goal of the policies of this section is to preserve and enhance the existing community character and sense of place by developing projects and programs that build upon positive design features, emphasizing the historical heritage of the Gold Rush. Hangtown, the historical name of Placerville, gives meaning to the historical image of the city. (General Plan, pg. 79.)

- Downtown: Main Street's historic buildings define the overall character of the downtown area and its historic nature contributes to its aesthetic values as well as providing economic benefit from tourist trade. (General Plan, pg. 80.)
 - Goal B: To protect and upgrade the visual and historical character of downtown.
 - Goal C: To protect and enhance to the visual quality and neighborhood integrity of residential areas.
 - Goal D: To upgrade the visual qualities and functional efficiency of Placerville's local streets.
 - The City shall ensure that new street projects are designed to minimize impact on terrain and natural vegetation.
 - Goal I: To promote architectural quality throughout Placerville.
- The City shall encourage the restoration and reuse of older structures, which contribute to Placerville's character and sense of historical and cultural identity. (General Plan, pg. 87.)

Alternatives

Pursuant to the Court's Order, the City must prepare a legally adequate EIR. Therefore, the IS must include a full range of feasible alternatives. Retention and Adaptive Reuse Alternatives should be considered in the EIR's alternatives analysis. Community members have suggested adaptive reuse alternatives that could avoid the demolition of the Clay Street Bridge altogether.

- Resident Sharlene McCaslin laid out adaptive reuse retention alternatives to the Project that should have been considered to avoid historic impacts, such as: rehabilitation of bridge, retention of the bridge as a monument or pedestrian/bicycle bridge and erection of a bypass, or maintained as one half of a traffic pair, with one-way traffic. Analysis should be done to consider a making Clay Street one way, or to make the stop at Main Street a right turn only, instead of realignment and bridge replacement.
- Commissioner Les Russell stated, "If the bridge is truly historic, I'd like to see somehow some of it preserved or all of preserved or whatever. There was a letter that outlined a couple of options and I think that they deserve being looked at, if this project goes ahead."
- Resident David Price noted that \$65,000 was collected 20 years ago to improve or rebuild the bridge, not to demolish it.
- Resident Robyn Rower stated that there are alternatives to demolishing the bridge. Rower noted that other buildings in the area were not above the 100-year stream flow levels. Rower stated another option would be to dig out underneath the bridge to accommodate 100-year stream flow years.

For the foregoing reasons, the Initial Study must be revised and circulated for publication, consistent with the Court's Order, Judgment and Writ.

Sincerely,
 Rachel Mansfield-Howlett
 Attorney for Friends of Historic Hangtown



Letter to City of Placerville from Friends of Historic Hangtown re Initial Study prepared for the Clay Street Bridge Replacement and Realignment Project
 September 9, 2014

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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
~~IN AND FOR THE COUNTY OF EL DORADO~~

FRIENDS OF HISTORIC HANGTOWN,
Petitioner,
vs.
CITY OF PLACERVILLE, et al.,
Respondent.

Case No.: PC20110145

ORDER GRANTING PETITION
FOR WRIT OF MANDATE

CITY OF PLACERVILLE, et al.,
Real Party in Interest.

This matter came on regularly for hearing on September 2, 2011 in Department 9 of this Court, located at 3321 Cameron Park Drive, Cameron Park, California. RACHEL MANSFIELD-HOWLETT of Provencher & Flatt, LLP appeared on behalf of Petitioner, FRIENDS OF HISTORIC HANGTOWN, and SABRINA TELLER of Remy, Thomas, Moose & Manley, LLP appeared on behalf of Respondents, CITY OF PLACERVILLE et al., and Real Party in Interest, CITY OF PLACERVILLE, et al.

The Court having reviewed the briefs submitted by counsel and

EXHIBIT A

1 heard the arguments of counsel at the hearing, ruled at the
2 conclusion of the Hearing that the CITY OF PLACERVILLE's approval of
3 the Clay Street/Cedar Ravine Realignment and Clay Street Bridge at
4 the Hangtown Creek Replacement project failed to comply with the
5 provisions of the California Environmental Quality Act in so far as
6 the City of Placerville had abused its discretion and failed to
7 proceed in the manner required by law when it approved the project
8 and adopted a mitigated negative declaration which did not consider
9 fair arguments that the Court found could be made regarding certain
10 potential impacts of the proposed project. These potential impacts
11 include:

- 12 a. Traffic Impacts
- 13 b. Parking Impacts
- 14 c. Urban Decay Impacts
- 15 d. Biological Impacts
- 16 e. Cultural Resource Impacts
- 17 f. Toxic Impacts
- 18 g. Aesthetic Impacts
- 19 h. Growth Inducing Impacts; and,
- 20 i. Inconsistency with Area Plans and Policies

21 IT IS THEREFORE ORDERED THAT:

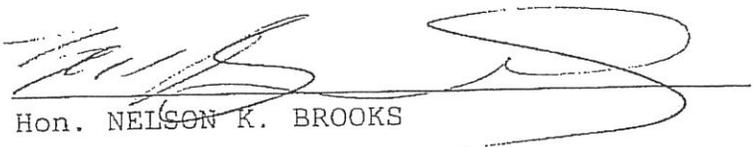
- 22 1. Judgment be entered in favor of Petitioner in this
23 proceeding.
- 24 2. A peremptory writ of mandate directed to Respondent be
25 issued under seal of this Court, ordered respondent to prepare an
26 Environmental Impact Report addressing the following areas:
 - 27 a. Traffic Impacts
 - 28 b. Parking Impacts

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- c. Urban Decay Impacts
- d. Biological Impacts
- e. Cultural Resource Impacts
- f. Toxic Impacts
- g. Aesthetic Impacts
- h. Growth Inducing Impacts
- i. Inconsistency with Area Plans and Policies.

Petitioner FRIENDS OF HISTORY HANGTOWN shall prepare a proposed form of Judgment and Writ consistent with this Order and circulate same among all counsel for approval before submitting the Judgment and Writ for the Court's review and signature.

DATED: February 14, 2012


Hon. NELSON K. BROOKS

CERTIFICATE OF MAILING

I, Sherry Howe , Deputy Clerk of the Superior Court of the County of El Dorado, State of California, do hereby certify that I am a citizen of the United States and employed in the County of El Dorado; I am over the age of eighteen years and not a party to the within action; my business address is Superior Court of the State of California, County of El Dorado, 3321 Cameron Park Drive, Cameron Park, California 95682; and that on February 14, 2012, I delivered a copy of the attached ORDER GRANTING PETITION FOR WRIT OF MANDATE, by placing a copy in an envelope addressed to each of the following:

Rachel Mansfield-Howlett, Esq., Provencher & Flatt, LLP, 823 Sonoma Avenue, Santa Rosa, CA 95404

Sabrina V. Teller, Esq.,/Jennifer Holman, Esq., Remy, Moose, Manley, LLP, 455 Capitol Mall, Ste. 210, Sacramento, CA 95814

John Driscoll, Esq. City of Placerville, 310 Center Street, Placerville, CA 95667

I am familiar with the business practice of El Dorado County Superior Court with regard to collection and processing of documents for mailing. The documents described above were then sealed and deposited in the United States mail (with postage fully prepaid) and/or in the El Dorado County inter-departmental mail or courthouse attorney box at Cameron Park, California.

Executed on February 14, 2012, at Cameron Park, California



Sherry Howe
Deputy Clerk

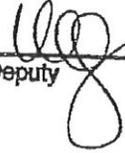
1 Rachel Mansfield-Howlett/SBN 248809
2 PROVENCHER & FLATT, LLP
3 823 Sonoma Avenue
4 Santa Rosa, CA 95404
5 707.284.2380, fax 707.284.2387
6 Rhowlettlaw@gmail.com

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FILED OCT 24 2012

BY

Deputy



Attorney for Petitioner

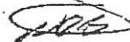
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF EL DORADO

11 FRIENDS OF HISTORIC HANGTOWN,

Case No. PC-20110145

12 Petitioner;

13 v.


14 **[PROPOSED] JUDGMENT**
15 **GRANTING PETITION**
16 **FOR WRIT OF MANDATE**

17 CITY OF PLACERVILLE *et al.*,

18 Respondents;

California Environmental Quality Act
[CEQA]

19 CITY OF PLACERVILLE *et al.*,

20 Real Party in Interest.

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28 Judgment Granting Peremptory Writ of Mandate
Case No. PC-20110145

EXHIBIT B

1 This matter came on regularly for hearing on September 2, 2011 in Department 9
2 of this Court, Judge Nelson Keith Brooks, presiding. Rachel Mansfield-Howlett,
3 Provencher & Flatt, LLP, appeared for Petitioner, Friends of Historic Hangtown;
4 Sabrina Teller, Remy, Thomas, Moose & Manley, LLP, appeared for Respondents and
5 Real Parties in Interest, City of Placerville, *et al.*

6 The Court having reviewed the record of proceedings in this matter, the briefs
7 submitted by counsel, and the arguments of counsel ruled in favor of granting the
8 Petition. On February 14, 2012 the Court issued an Order Granting Petition for Writ of
9 Mandate. The Order is attached and incorporated by reference as Exhibit A. The
10 Proposed Writ is attached as Exhibit B.

11 **IT IS ORDERED, ADJUDGED AND DECREED, that:**

- 12 1. The Petition for Writ of Mandamus is GRANTED.
- 13 2. Set aside all approvals of the Project and the MND. Respondents shall within 45
14 days set aside and void any and all approvals and findings of the Clay
15 Street/Cedar Ravine Realignment and Clay Street Bridge at Hangtown Creek
16 Replacement Project (hereafter, "Project"), the approval of the Mitigated
17 Negative Declaration (MND) and Mitigation Monitoring Program. Respondents
18 shall refrain from further approval of the Project unless and until Respondents
19 prepare an adequate Environmental Impact Report (EIR) that complies with the
20 laws of CEQA and this Judgment.
- 21 3. Violations of CEQA.
22 The City abused its discretion and failed to proceed in the manner required by
23 law when it approved the project and adopted a mitigated negative declaration
24 which did not consider fair argument that the Court found could be made
25 regarding certain potential impacts of the proposed project. These potential
26 impacts include:
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- i. Traffic Impacts
- ii. Parking Impacts
- iii. Urban Decay Impacts
- iv. Biological Impacts
- v. Cultural Resource Impacts
- vi. Toxic Impacts
- vii. Aesthetic Impacts
- viii. Growth Inducing Impacts; and
- ix. Inconsistency with Area Plans and Policies

(Order at 6.)

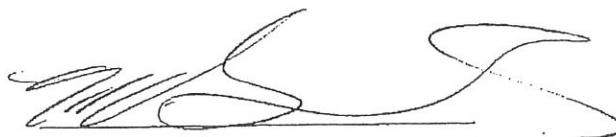
4. Peremptory Writ. A Peremptory Writ of Mandate shall issue in the form attached to this judgment as "Exhibit B".
5. Suspension of Activities Related to the Project. To suspend any and all activities or consideration of approvals related to the Project that could result in any change or alteration to the physical environment until Respondent has prepared an adequate Environmental Impact Report in compliance with CEQA and this Court's Judgment.
6. Return to Writ. A Return to the Writ shall be filed with the Court within 45 days after the writ is issued, reporting compliance with Paragraph 2, herein. Should Respondent, City of Placerville choose to further consider approval of the Roundabout Project, Respondent shall file a return updating the Court and reporting compliance with Paragraph 3 and 4, herein, and requesting a hearing date that is convenient to the Court and counsel.

- 1 7. Retention of Jurisdiction. Under section 21168.9 of the Public Resources Code,
2 this Court retains jurisdiction over this matter by way of a Return to the
3 Peremptory Writ of Mandate and any Objections to the Return. The Court
4 reserves jurisdiction over the issue of Petitioners' claim of entitlement to an
5 award of private attorney general fees and costs pursuant to Code of Civil
6 Procedure section 1021.5. Any motion for said fees and costs shall be filed and
7 served within 60 days of Petitioner's filing of the Notice of Entry of this
8 Judgment.
- 9 8. Costs. Statutory Costs shall be awarded to Petitioner according to proof.
- 10 9. Nothing in this Judgment directs the City to exercise its discretion in a particular
11 way upon compliance with law.

12 **ORDER**

13 Good cause appearing, **IT IS SO ORDERED** that the judgment be entered.

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15 DATED: ^{et} March 21, 2012

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18 **NELSON KEITH BROOKS**
19 Honorable Nelson K. Brooks
20 Judge of the Superior Court
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1 Rachel Mansfield-Howlett/SBN 248809
2 PROVENCHER & FLATT, LLP
3 823 Sonoma Avenue
4 Santa Rosa, CA 95404
5 707.284.2380, fax 707.284.2387
6 Rhowlettlaw@gmail.com

7 Attorney for Petitioner

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF EL DORADO

10
11 FRIENDS OF HISTORIC HANGTOWN,

Case No. PC-20110145

12 Petitioner;

13 v.

~~PROPOSED~~ PEREMPTORY WRIT
OF MANDATE

14 CITY OF PLACERVILLE *et al.*,

15 Respondents;

California Environmental Quality Act
[CEQA]

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18 CITY OF PLACERVILLE *et al.*,

19 Real Party in Interest.

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26 EXHIBIT B

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Peremptory Writ of Mandate
Case No. PC-20110145

EXHIBIT C

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TO THE CITY OF PLACERVILLE AND ITS COUNCIL:

Judgment having been entered in this action ordering that a Peremptory Writ of Mandate issue from this Court:

YOU ARE HEREBY COMMANDED:

1. To set aside and void any and all approvals and findings for the Clay Street/Cedar Ravine Realignment and Clay Street Bridge at Hangtown Creek Replacement Project (hereafter, "Project"), including the Mitigated Negative Declaration, and Mitigation Monitoring Plan, within 45 days of service of this Writ.
2. To suspend any and all activities or consideration of approvals related to the Project that could result in any change or alteration to the physical environment until Respondent has prepared an adequate Environmental Impact Report in compliance with CEQA and this Court's Judgment.
3. To make and file a return to this Writ not later than 45 days after the writ is issued, reporting compliance with Paragraph 1, herein. Should Respondents, City of Placerville choose to further consider approval of the Project, Respondents shall file a return updating the Court and reporting compliance with Paragraph 2, herein, and requesting a hearing date that is convenient to the Court and counsel.
4. Under section 21168.9 of the Public Resources Code, this Court retains jurisdiction over this matter by way of a Return to this Peremptory Writ of Mandate, any Objections to the Return, and the issue of Attorneys' Fees and Costs.

Nothing in this writ shall be construed to limit the discretion or control legally vested in the City of Placerville.

1 **DATED:** March ____, 2012

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_____, Clerk

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ATTN: PIERRE RIVAS

RECEIVED

Potential impacts re: Clay st realignment and bridge replacement project
NOP for the EIR.

SEP 09 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

There are virtually no plans to analyze. Therefore adequate QECA impacts can not be fully anticipated, nor adequately analyzed.

Action needed: Create minimum project renderings before proceeding with Draft EIR, and re-hold a scoping meeting.

No traffic study can be found on the City's website to analyze for potential flaws in analysis. The traffic study sub-contractor stated that he was not from around here, so had little knowledge of local traffic issues. (Bypasses in local neighborhoods.) Please increase project study area if necessary to study impacts to Bedford, & Pacific "bypasses."

Action needed: City must post any traffic studies on it's website before proceeding with Draft EIR, and re-hold a scoping meeting.

The proposed realignment will create traffic and growth inducing impacts. By improving the intersection, developable lands to the North will now have a brand new higher capacity roadway, which would allow for higher building densities and thereby higher traffic volumes.

Action needed: A rough count of current possible Dwelling Units that could be built to the North right now, by right.

Study all potential public safety aspects involving Clay st & the trail. With an improved traffic flow & speeds, comes increased danger to pedestrians, bicycles, etc. Mitigate with protective measures.

There is no reason whatsoever, that the sole mature tree at the new intersection, should & could not be saved (Aesthetics). If the roadway needs to shift, so be it. PMC's Figure 3, shows the sidewalk going right through the trunk. There is no mitigating the loss of this possible rare cork oak. Save it.

Aesthetics. All a), b), c) & d) should be categorized "Less than significant with mitigation incorporated". Removing the bridge, removing the handicap creek viewing park, removing mature trees, removing quaint narrow roads and bridges, etc. All are significant impacts to the scenic vistas and landscapes, and will substantially damage senic resources. Mitigation is required.

Traffic studies should analyze the immediate areas traffic circulation around the proposed intersection. 1) Clay st/Main st North to Clay st/Mosquito rd & Hwy 50 interaction. 2) East to Main st/Broadway/Mosquito rd 3) South to Cedar Ravine/Washington 4) Main st/Turner to Washington/Cedar Ravine 5) Cedar Ravine/Pacific to Pacific/Hwy 49 6) North on Clay to Lincoln & Clay/Coleman.

Mitigation should consider making the short sections of Lincoln and Coleman to be one way only Eastbound. This is to stop the use of theses narrow residential streets from becoming "bypass routes" cutting through and using Bedford to travel West.

MICHAEL DROBESH

Marian Washburn
2831 Azalea Lane
Placerville CA 95667
530-622-4647
mewash@hotmail.com

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SEP 05 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

September 2, 2014

Pierre Rivas
Community Development and Planning Director
City of Placerville, CA

Re: Comments concerning Clay Street, Cedar Ravine Bridge and Realignment Project Proposal

- **Traffic Volumes**

A high volume of cars passes through the constricted space at Clay St. and Main every day. From what I understand, traffic counts were conducted at "peak hours". Because the study area is within a half mile of both a elementary school and a regional acute care hospital, this location's peak hour is not the normal 5:00 p.m. hour but more around 2:30 to 4:30 due to school hours and shift changes at the hospital. A traffic count reflecting true local conditions at the real peak hours for the study area needs to be conducted in order to accurately assess the degree of modification this intersection requires.

- **Traffic Patterns and the Realignment of Clay and Cedar Ravine**

Please note, locals exiting Clay Street from upper Clay and Coleman and points north of Coleman use the Ivy House Parking Lot as a de facto Roundabout when heading south to Cedar Ravine. The most effective way to go south on Cedar Ravine from Clay St. is by circling through the parking lot to exit, and then getting in the west bound on Main, then turning from the left hand turn lane onto Clay.

A similar situation ensues with heavy traffic conditions when one wants to head east on Main from either Cedar Ravine or making a U turn on Main at Cedar Ravine. The parking lot of C & H Auto parts is often used for a de facto Roundabout.

Widening the bridge and improving the Clay Street entrance was a mitigation and condition of approval for the Cottonwood subdivisions. A Councilmember noted at the time that if Clay Street improvements were not made, the result would be inappropriate increase in traffic, both east and west bound, in order to avoid the Clay and Main St. Intersection. This indeed, proved to be the case. Coleman is exceptionally narrow and steep. Site distance is virtually zero where Benson intersects Coleman. Therefore, an improved intersection at Clay and Main would relieve the neighborhood to the north of inappropriate traffic patterns inflicted by the Cottonwood projects and the as-yet uncompleted mitigation.

- **Design:**

It is clear that the citizens of Placerville place a great value on the appearance of the historic downtown area. Whatever bridge design is selected, it should be compatible and enhancing to the historic core. The Druid Monument should be incorporated in a manner that enhances both the monument itself, but also enhances the

immediate area as a totality. A newly designed bridge and intersection would be an opportunity to create a signature look that could possibly merge with an improved layout of the local Farmers Market. Citizens should have the opportunity, with Managers of the Farmers Market, to review the design for appearance and historic compatibility.

- **Creek High water flows:**

See attached photo showing high water one-half block east of the proposal. This photo illustrates the need to have additional clearance for water flow and higher railings to keep cars from plunging into the creek in extreme conditions.

- **Safety Conditions:**

The current proposals: a signalized intersection or an intersection with stop signs will deteriorate safety.

With each passing year, traffic increases due to tourism, an expanding hospital, an active downtown business climate and larger populations to the west visiting for business or pleasure. That means more cars through the Clay/Cedar Ravine Intersection. An improved and realigned intersection will induce more usage and more cars.

Either a stop sign approach or a signalization approach will lead to increased collisions from drivers disregarding the signs or lights. Despite the fact the Council voted to eliminate the Roundabout approach, it is clear the remaining proposals will result in more collisions and injuries over time with an expanded intersection. The Insurance Institute for Highway Safety, The Federal Highways Administration Office of Safety, and Cal Trans all have extensive studies and statistics confirming the incidence of collisions on the various modes. The E.I.R should recognize future increased traffic resulting from the project and the collision statistics that would result.

- **Air Quality**

An upgraded, wider intersection will ultimately be traffic inducing. The two alternatives: signalization or stop signs both necessitate cars stopping, idling and then accelerating. Because the project will induce higher usage, air pollution levels will increase.

Studies by the National Cooperative Highway Research Program in co-operation with the US Department of Transportation and the Federal Highway Commission show that roundabout traffic patterns substantially reduce car emissions and thus, pollution. By rejecting the Roundabout alternative, air pollution will increase as traffic usage increases.



ONE BLOCK EAST OF CLAY ST.

Dear Mr. Rivas,

I am writing this letter in response to the city council, wanting to realign Clay Street to Cedar Ravine. I am adamantly opposed to this realignment. I fought against the round-a-bout and will fight against realignment. I am a business owner at 585 Main St, the impact on my business for two years will be total devastation to me and my family, as well as the other businesses on Main street. We need every parking place we have down there. The parking lots, both of them, are full all the time, except maybe Sunday afternoon. I can't understand how you figure this is a good thing. Clay Street does not have the traffic to sustain such realignment. The money spent on this project is a total waste of money and resources. If you must do something make Clay Street a right turn only lane, that's fixes any of the problems you think there are. Right now the P.D.A. is looking at ways of finding more parking and you people are trying to decrease the much needed parking spots that are available, tell me how this makes any sense. Right now the P.D.A. is looking at making downtown a historical area, how does destroying an historical bridge make any sense? This whole thing makes no sense. Just because you have money from a Federal Grant, makes this right? You don't need to spend the federal money and a whole lot more of tax payer money, this makes no sense. So please abandon this foolish plan as you will have a fight on your hands

Sincerely,

A handwritten signature in cursive script that reads "Lou Andersen". The signature is written in black ink and is positioned below the word "Sincerely,".

RECEIVED

SEP 02 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

RECEIVED

SEP 09 2014

Keith Johnson

CITY OF PLACERVILLE
FINANCE DEPARTMENT

3129 Spanish Ravine Rd.
Placerville, California 95667
530.748.3569
ecoroads@comcast.net

9/9/14

Subject: Scoping Comments for Clay Street Bridge Widening and Realignment Project.

Dear Project Consultants,

I appreciate the opportunity to ask questions about this project and request answers in writing.

1. Would the EIR please consider "shading" the new parking lots? Is this feasible? There are 3 water meters, will these water meters be utilized in any landscaping planned? .
2. Are any watershed -friendly storm drains planned for this project? If so, please explain and describe any natural filtering systems and will there be any grassy filter strips?
3. Will the heritage redwood tree root line at the NW corner of the bridge be protected?
4. The original project description stated that the removal of the handicapped accessible creek overview area would be mitigated by completion of the trail between Clay and Bedford. The 8/11 NOP makes no mention of this in any of the project alternatives. Has this mitigation been eliminated? Is there no mitigation?
5. Has the City established creek setbacks? If not, why not? If so, what setbacks are to be used when the current overview is replaced by parking places? How will the covering of creek, removal of the creek landscape across from the wheelchair access be mitigated?
6. Will the cork oak at Cedar Ravine and Main be removed? How will this loss of shade and beauty be mitigated? It appears (?) that a new planter (with Druid Monument) will replace the existing planter. How will this new planter compare with the old Planter in size? Is there a planter in the middle of the new parking lot? What is its size?
7. Will the historic rock wall that currently connects Main Street to the bridge and surrounds the planter be removed? If so, will it be reconstructed elsewhere? If so, where? When? If not what mitigation is planned for the removal of this wall? Would a narrower roadway & bridge allow for more landscaping and avoid creating a massive intersection? Does this project fit the scale of our town? Can it be scaled back some?

Please reconsider the roundabout as the most viable traffic alternative for this intersection.
Thank you for your time & consideration,

Keith Johnson



To: City of Placerville
Attn.: Pierre Rivas
From: Kathi Lishman
Email: klishman@mac.com
Re: Scoping Comments for Initial Study for EIR for Clay Street Bridge Replacement and Realignment Project
Date: September 9, 2014

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1. **Aesthetics** This project is degrading the visual character of the project area, and needs to be better addressed. The loss of the raised stone planter is significant, as is the loss of the pocket park on the north edge of the parking lot. The raised planter along the sidewalk, softens the area, and makes for a buffer between the street and the parking lot, as well as providing shade. The raised stone planter and the stone walls add character to that area. What will mitigate that loss?
2. **Parking** There is currently only one parking lot with approximately 72 spaces. Two parking lots are being proposed onsite, with approximately half of the current parking spaces being lost, and needing to be located offsite. The loss of parking spaces is excessive. It appears we are getting massive asphalt, with wider streets. Having two parking lots, with fewer spaces onsite is confusing and chaotic. Where will the two parking lot entrances be? As vehicles look for a place to park, how do they know which parking lot to enter? If they enter one parking lot and it is full, they will have to exit one and enter the other. Parking lots need landscaping and shade trees. Is that being proposed? It also looks like parking will be right up against the creek. How will that be mitigated. And where will the additional offsite parking be? How will the parking be located so as not to infringe on existing neighborhoods?
3. **Transportation/Traffic** What traffic calming measures will be utilized? Can the streets and the new bridge be narrower, and in scale with the community? Can the Druid Monument be basically left where it is but adjusted a little? The existing bridge is 19' wide. Can it be much narrower than the 46' width proposed? Traffic will all be coming to a stop. What is the minimum width the streets and bridge can be? Can the bridge just have sidewalk on one side?
4. **Air Quality** With cars constantly stopping and going, please explain how this project will improve congestion and air quality.
5. **Hydrology & Water Quality** Will bioswales be incorporated into this project to provide for a natural filtering system to protect the creek and the storm drains?
6. **Hangtown Creek** What can this project do to improve and enhance Hangtown Creek?
7. **Community Design Element of the General Plan** Was this project checked for compatibility with the Community Design Element?

From Caltrans CEQA Guidelines: "It is important to analyze alternatives in an EIR in order to provide a reasonable range of alternatives, including, those which would attain most of the basic project objectives while avoiding or reducing the environmental effects of the project."

I see no good solution to this project. I am for making improvements, but I definitely think other alternatives need to be looked at. The roundabout should not have been removed from the EIR.

Besides the roundabout and the three alternatives in the projects, this EIR should add as an alternative: Replace the Bridge Only, and leave Clay Street where it is, with right turn only at the intersection on Main St. and Clay St. In addition the Ivy House Parking Lot exit onto Main St. could be closed, adding more parking, and preventing cars from using the parking lot as a short cut.

The garden in the raised stone planter at the Ivy House Lot was planted and is maintained by Community Pride, whose mission is, "*to improve the grace and charm of Placerville*". Where are the elements of this project that improve the grace and charm of Placerville?

The project needs to be in scale with the commercial area, the surrounding neighborhoods and historic Main St. The following is some information from the Local Government Commission website (www.lgc.org), a rich resource for good planning for livable communities.

"A 1998 study of 20,000 accidents over a 20-year period by Swift & Associates of Longmont, Colorado found a direct correlation between street width and accident rates. The safest streets were roughly 24 feet wide. As streets gained width the number of accidents (per mile, per year) increased. Therefore, higher traffic speeds that often result from wider streets may account for this rise in traffic accidents.

The traditional neighborhood street, however, is narrow and lined with trees that not only help calm traffic but also increase comfort for walkers and cyclists. Many residents and local officials are recognizing that these traditional streets help form more livable neighborhoods. As a result, efforts are underway to design or retrofit more streets to mirror these characteristics, including such measures as 'traffic calming.' The latter denotes a set of mostly physical treatments to roadways that help manage traffic flow and encourage safer, more civil driver behavior within districts and neighborhoods. Traffic speed, noise and volume are often reduced, and traffic distribution rebalanced, via such measures. The LGC has published a detailed guide to traffic calming that explains the technical and collaborative processes required for its implementation."

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September 4, 2014

SEP 05 2014

City of Placerville
Attn: Pierre Rivas
3101 Center St.
Placerville CA 95667

CITY OF PLACERVILLE
FINANCE DEPARTMENT

Re: Environmental Impact Report for the Clay Street
Bridge Replacement and Realignment Project (Clay St. Project)
Comments in Response to Notice of Preparation and Initial Study

Dear Mr. Rivas:

The following comments are submitted in response to the City of Placerville's Initial Study on the Clay St. Project. For ease of reference, comments are presented in the same order as in the Initial Study.

Page 1, 5. Description of Project.

The description of the City's plan to mitigate the loss of 34 parking places if the Clay Street bridge is realigned is inadequate. The Initial Study states: "[T]he City has identified several locations that can be developed to mitigate and result in no net loss of parking spaces." These locations are nowhere specifically identified in the Initial Study, making it impossible to comment on their safety or adequacy or to determine if they truly mitigate the substantial loss of parking which will result from realignment.

In contrast, the Mitigated Negative Declaration (prepared by the City prior to the 2012 court decision mandating an Environmental Impact Report) does identify three specific locations as "[r]eplacement parking options under consideration," two of which are on or adjacent to Locust Avenue. Assuming these are still among the "several [unspecified] locations" the City in the current Initial Study has "identified", these Locust locations are inadequate, pose substantial safety concerns, are not visible from Main Street, and do not help to mitigate the loss of 34 centrally-located parking places at the Clay/Main/Cedar Ravine intersection, an increasingly vibrant area of Placerville frequented by tourists and locals alike— both of whom need parking.

Page 7. Project Alternatives

The Initial Study states that the Clay St. Project alternatives "...are preliminary and are subject to change during the project development process." (The numerals of the alternatives and the numbers referred to in the descriptions of each in the Initial Study do not agree.)

Both alternatives 1 [2] and 2 [3] involve realigning Clay Street. Alternative 3 [4] is the "no project" alternative. I would like to propose another alternative for consideration in the Environmental Impact Report, which would precede the "no project" alternative:

Alternative 3—No Realignment/Right Turn Only Alternative

Alternative 3 would not realign Clay Street but would make upgrades to the existing bridge. Under this alternative, the intersections at Clay Street and Cedar Ravine Road would remain the same, except that only a right turn onto Main Street from Clay Street would be permitted.

Although environmental impact likely would be substantially less than that occasioned by realignment, a “no realignment” alternative should be analyzed as thoroughly in the Environmental Impact Report as the realignment options. This proposed alternative would permit compliance with whatever the City may have agreed to in the past regarding bridge improvement, whereas the “no project” alternative would not.

Page 10. Environmental Factors Potentially Affected

Although not checked, “Aesthetics” would be affected by the Clay Street project. The present Clay Street bridge, albeit structurally obsolete, blends well with the surrounding buildings and vegetation. Any new bridge should do the same. And the Druid Monument is not only a cultural resource, but also an aesthetic component of the present intersection.

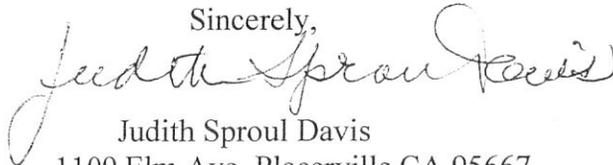
Justification for the realignment alternatives is “to improve roadway safety, reduce congestion, and meet current and future traffic needs.” Therefore, it is imperative that thorough traffic studies be conducted. These studies should include data on the number of vehicles entering/exiting Clay Street onto Mosquito Road as well as onto Main. Since air pollution from cars idling at the Clay/Main intersection waiting to turn left appears to be of great concern, it would be helpful to know what proportion of vehicles exiting Clay are instead making a relatively easy right. Comparison of the safety/congestion record of the Clay/Main/Cedar Ravine intersection with other major Placerville intersections (such as Main/Bedford or Broadway/Mosquito) would also be helpful.

Other Factors Affected Not Addressed by the Initial Study

Both realignment alternatives would eliminate the Farmer’s Market at its present location. As the Farmer’s Market likely is neither an “existing structure” nor a “recreational resource,” the Initial Study does not address this loss. But every Saturday from May through October, the Farmer’s Market at Clay/Cedar Ravine/Main provides an opportunity to purchase farm-fresh food direct from the producer while socializing with neighbors and building community. The Market is part of Placerville’s unique environment, even if CEQA (enacted in 1970, before the explosive growth of farmers’ markets or the “farm to fork” / locavore movement) does not require that it be studied.

Thank you for providing this opportunity to comment. I look forward to seeing the draft Environmental Impact Report. Please keep me advised of any public meetings on the Clay St. Project.

Sincerely,



Judith Sproul Davis
1109 Elm Ave. Placerville CA 95667
(530) 626-3036 jsprould@comcast.net

Joyce Bahnsen

2928 Bedford Avenue
Placerville, CA 95667
(530) 626-3429

September 7, 2014

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SEP 09 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

Pierre Rivas
City of Placerville
California

Re: Clay Street Bridge

Placerville is one of the few remaining cities to offer old time heritage. Citizens and visitors enjoy our old town atmosphere, created from the early days of the gold miners. Lets focus on this tradition.

DO NOT CHANGE OUR OMBIANCE for an unnecessary expensive project to just "enlarge" the Clay Street bridge!!. Don't we have better uses for our money?. Just look around and you will see how many of our local roads need improvement.

For example: When the Highway 50 Bedford Bridge was raised a few years ago, there was a promise to repave Bedford Street that tore up the road from the heavy truck traffic. This never happened, Why?

I am sure there are also many, many better ways to spend our local, state or federal tax payer money, if indeed this is the purpose.

Sincerely,


Joyce Bahnsen

City of Placerville
Attn.: Pierre Rivas
3101 Center Street
Placerville, CA 95667

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SEP 09 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

RE: Environmental Impact Report for the Clay Street Bridge
Replacement and Realignment Project

Dear City of Placerville,

I prefer Alternative 2 – All-Way Stop Intersection for the intersection at Main Street and Cedar Ravine. I use this intersection daily and believe this is the best option presented.

I have almost been hit twice riding my bicycle, making a left turn from Main Street onto Clay Street. Drivers coming out of Clay Street onto Main Street are rushed with a limited line of site. They are not able to be properly attentive while trying to jump into traffic with short windows of opportunity.

Additionally, the curbs all around this intersection are very difficult to manage a wheel chair. While pushing a friend in a wheelchair, I was forced into the street a couple times to be able to traverse from Sweetie Pies to the Cosmic Café to C&H Auto Parts. If construction of new curbs could be more conducive to navigating a wheel chair, this would be appreciated.

I am not in favor of a stop light. They are ugly and high maintenance. I would rather have a Roundabout than a stop light.

I am also in favor of moving the Farmer's Market alongside the trail to free up parking and reduce traffic Saturday mornings. I think you may have to think about the bathroom location more closely to reduce vandalism (thinking where the most eyes will be on it.) Bike traffic will likely need to be routed onto Main Street a block sooner. A sign to be placed on the trail during these times could help trail users on bicycles.

Lastly, I think the city should consider additional plaques on or around the druid monument explaining who the druids are and how they arrived in Placerville. It would add to the historical character of our town.

Sincerely,



Jackie Neau

1525 Sean Drive
Placerville, CA 95667
City of Placerville Resident

August 27, 2014

Mr. Pierre Rivas
City of Placerville
3101 Center St.
Placerville, CA 95667

Dear Mr. Rivas:

**NOP: ENVIRONMENTAL IMPACT REPORT FOR THE CLAY ST. BRIDGE
REPLACEMENT AND REALIGNMENT PROJECT**

HISTORIC RESOURCES: OVERVIEW

As represented by the Friends of Historic Hangtown in Case No. PC-20110145, historic resources lie within and surround the Project site. North and south of Highway 50 are locally designated residential historic districts, the Bedford Avenue Clay St. Residential Historic District and the Cedar Ravine Residential Historic District. To the south and west lie commercial historic properties. The Project adjoins two of the City's residential historic districts and the downtown historic district overlay zone, and would cause a potential impact by bisecting the historic areas of the City. The buildings located at the Main St. and Clay St. intersection are all housed in historic buildings, including Sweetie Pies Restaurant, Lofty Lou's Yarn Shoppe, Cozmic Care and Empress Clothing in the Pearson Soda Works Building. Historic bed and breakfast establishments are located on Clay St. and Cedar Ravine.

HISTORIC RESOURCE: CLAY ST. BRIDGE

It is important to note that bridges within or near historic districts have the potential to gain significance, beyond the significance level identified when considering the Clay St. Bridge alone, and to be a contributing element of the historic district and/or historic landscape.

The proposed 46' concrete slab Clay St. Bridge would in no way be historic looking, would introduce a "new intrusion" in this historic area of Placerville, and would no longer convey a sense of the historic environment. The new bridge constitutes a potential intrusion on the historic landscape.

The 74-year old Clay St. Bridge is the last remaining old bridge connecting the historic downtown area with the historic properties north of Highway 50. It is well beyond the 50-year age where most structures and properties fall into the historic category. It is not necessary for the Clay St. Bridge to be included in or eligible for the National and California registers to be considered an historic resource.

The City's August 2014 Clay St. Bridge Project NOP cites a 2004 Caltrans Historic Bridges Inventory which states that the Bridge "does not appear to meet the criteria for listing in the National Register." However, in an October 2010 letter (copy attached), the Office of Historic Preservation wrote:

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

"[T]he National Register criteria are not the appropriate regulatory framework to be applied when determining whether an historical resource is an historical resource for purposes of CEQA. The benchmark to be used for CEQA is the California Register of Historical Resources. A resource might not qualify for the National Register but still be eligible for the California Register. Thus an evaluation using the inappropriate criteria could lead to wrong results compromising CEQA findings by a Lead Agency."

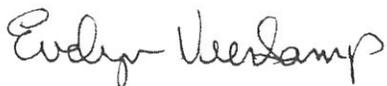
The Clay St. Bridge is characterized as "functionally obsolete" simply due to one factor: the narrowness of the structure. It is not considered "structurally deficient". A functionally obsolete bridge is one that was built to standards that are not used today. These bridges are not automatically rated as structurally deficient, nor are they inherently unsafe. Functionally obsolete bridges are those that do not have adequate lane widths, shoulder widths, or vertical clearances to serve current traffic demand, or those that may be occasionally flooded. This does not render them unfit for adaptive reuse, such as restoring the bridge as a pedestrian footbridge.

* * * * *

On October 22, 2013, when authorizing the PMC EIR contract for the Clay St. Bridge, City Council stipulated, in response to public concerns, that the contract would include two additional design workshops. Today's Scoping Meeting takes place without any such design workshops having been held. When are the workshops scheduled?

A closing question: What in the City's planning requires the more than doubling of the width of Clay St. Bridge – from 19' to 46'? This dramatic widening, taken together with the proposed realignment, suggests increased traffic flow and future traffic impacts. To what extent is the expansion of Marshall Hospital part of the equation? What other projects will benefit? Such information would help inform the public discussion.

Respectfully,



Evelyn Veerkamp
3047 Lewis St.
Placerville, CA 95667

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SEP 09 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

September 8, 2014

Mr. Pierre Rivas
Development Services Director
3101 Center Street
Placerville, Ca 95667

Re: Environmental Impact Scoping Meeting for Clay Street Bridge Replacement and Realignment Project

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

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

The Project is in Potential Serious Violation of the Court Judgment:

Segmentation of a project is not allowed under CEQA. The City separated out (segmented) the Trails portion of the previous version of this Project. The city then moved the Trails segment along without a full EIR review. The court's Judgment was that, if the city went forward with the Project, a full Environmental Impact Report be done. This aspect of Segmentation was brought to the city council's attention, the evening the Trails segment was voted upon to proceed. Council and the City Attorney did not seem to care and proceeded anyway. This is a serious violation of the Courts Judgment.

The Project is Misleading, Inaccurate and Incomplete:

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

The CEQA court decisions are unanimous in requiring a complete and accurate description of a "project".

The Project itself has been misleading as to the need and purpose of what is to be accomplished by doing the project itself or the claimed potential gains. From the very beginning the city had their plans as to what the project would be.

While the proposed "Project (s)" have always been considered a poor decision because of the impacts and the questions on a real need. The Public has not been given the opportunity to participate in the decisions on selecting the alternatives or other solutions to the perceived problems. The city provided a Chat Meeting in which 90% of the attendance spoke against the Clay Street bridge replacement, Clay Street realignment proposed and asked for other options to be considered. We were told that there would be other meetings to consider design and other alternatives. City granted two additional "community design" meetings at the Oct. 22, 2013 city council meeting. At the Aug. 27, 2014 scoping meeting, Pierre Rivas stated that the two additional design meetings would not be held. While this may not be covered under CEQA, it is a direct lie to the citizens of Placerville.

No alternative plans discussed by the public were ever given consideration after they were presented. In addition to the 36+ parking spots loss from the Ivy House parking, an 15-20 parking spots used daily will be loss from the underpass to Grandview Street. The daily usage is between 15 -20 cars using the street parking. Total loss of parking would be 55+ spots.

The proposed Project's potential to result in significant impacts or adverse effects on the visual resources of the areas in which those segments would be located. The Clay Street Bridge Replacement and Realignment Project in size and scale are not appropriate clay street and its modern features. *Potentially Significant Impact* City updates have been next to none. Right in the middle of the EIR process the city decided to pull the Roundabout out as a option. The Reference to the "Roundabout Project" always had been identified as 4 projects combined into one. The City Roundabout Project included, the Trail Project, the Bridge replacement, Realignment of Clay Street and the Roundabout.

To further complicate and confuse the purpose of the project, there are inconsistencies in the Streetscape Plan as to its precision in details and inaccuracies in the General Plan.

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

The project is intended to provide improved traffic conveyance in *downtown Placerville* and *enhanced recreational opportunities...* However, the first Clay Street Draft Project Report contradicts the purpose by stating "The purpose of this project is to *improve roadway safety, reduce congestion meet current and future traffic needs.*" The City justifies the need for the project to alleviate current traffic congestion and to provide for projected deterioration in levels of service. We submit the project, Instead, suggests future traffic intensification. This anticipated reduction in level of service has the cumulative effect of traffic intensification throughout the city.

Will the project will result in an increase in vehicle trips or traffic congestion, or a decrease in level of service." This is the very argument cited as the need for the project in the first place. So, which is it?

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

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

AESTHETIC IMPACT

The Project is in the Historic Area and would cause an adverse and significant impact on the environment, loss of historical, cultural identity and visual resources. The majority of the ambient atmosphere of a historic gold rush town with small town character would be permanently lost.

The proposed Project and cumulative development in the surrounding region would contribute to a shift in visual character and quality from open space to a more modern urbanized feel. This cumulative impact would be *significant and* Permanently alter the streetscape atmosphere, picturesque quality, to walkers, pedestrians and other viewer groups. Generally the residents, recreationist, leisure travelers and tourists would have the largest impact with viewer sensitivity. 3.3.23-2.

Mitigation to reduce substantial impacts levels are not feasible with current Project proposals. The City of Placerville General Plan Background Report (1989) identifies the historic buildings in downtown Placerville and Hangtown Creek as the primary scenic resources in the project area. The proposed project involves reconstruction of an existing intersection, realignment of an existing road, replacement of an existing bridge facility, all of which would significantly alter the views of downtown Placerville or Hangtown Creek, although this impact is considered less than significant by the city.

The project would significantly alter the views of downtown Placerville as seen from US 50, "California scenic corridor". Views of downtown Placerville along the segment of US 50 of which the proposed project site is located are partially obstructed by a row of trees along the southern edge of the highway. The Large matured Twin Redwood Tree has been planned to removed among other trees and Biological resources. The mitigation is inadequate to mitigate the aesthetic impact to city. The one design page shows the rare Cork Oak Tree across from the Cozmic Café that would be removed. This is unnecessary, the road should be shifted so as to save this unique and rare mature tree. Because the city has not adequately mitigated the Aesthetic Impacts we require the "No Project" option be adopted by the city council.

Air QUALITY

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

Because the city has not adequately mitigated the Biological Impacts we require the "No Project" Air Quality option be adopted by the city council.

BIOLOGICAL RESOURE IMPACTS

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

Because the city has not adequately mitigated the Biological Impacts we require the "No Project" option be adopted by the city council.

HISTORICAL and CULTURAL RESOURCES IMPACTS

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

The location of the project is adjoining two of the City's residential historic districts and the proposed downtown historic district overlay zone, and would only serve to bisect the historic areas of the City.

The businesses located at the Main Street and Clay Street intersection are all housed in historic buildings, including Sweetie Pies Restaurant, Lofty Lou's Yarn Shop, Bob Darling Photography, Cosmic Cafe and

Empress Clothing in the Pearson Soda Works Building. In fact, the original Area of Potential Effects (APE) was modified early in the process to eliminate portions of the APE located along Clay and Pacific Streets and the southwest corner of Main Street and Cedar Ravine Road "to avoid several historic period cultural resources." (Draft Archaeological Survey Report, Summary of Findings, page I, which shows intent to ignore the historical and cultural resources of the area adjacent to and surrounding the project area in violation of CEQA regulations.)

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

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

Historic Clay Street Bridge

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

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

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

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

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

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

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

The top of the left concrete rail has spalled along 25% of the length. There is a 75 mm (3") dip in the left sidewalk over Pier 2. It appears that the fill material between the arches has compressed because there are no indications of problems in the substructure. There are moderate size cracks at other locations on the sidewalk. The arches remain in good condition.

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

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

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

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

replacement. Shouldn't these options have been included "to satisfy alternatives analysis requirements under CEQA"?

The project has an obligation to avoid, minimize or mitigate any harm to historic resources, including the Clay Street Bridge. Rehabilitation of the bridge would make more sense in light of its location and the impact to the nearby historic districts and to the historic properties along Main Street. Perhaps the following alternatives might be considered: Leave the bridge in place, complete the recommended repairs and put up signs to notify traffic of a one-way bridge ahead, or erect a stop sign or a yield sign in one direction. The bridge could be left as a monument or pedestrian/bicycle bridge, and a bypass bridge could be designed. The Clay Street Bridge could be maintained as one-half of a traffic pair, with one-way traffic on each bridge. The bridge could be widened to two lanes, retaining the existing culvert, and repairing the side rails for pedestrian safety.

Why were none of these alternatives included in the Environmental Report "to satisfy alternatives analysis requirements under CEQA"? The above comments clearly provide a fair argument for the preservation of the historic Clay Street Bridge. It is in the public interest to do so; therefore, the bridge *must not* be demolished. Because the city has not adequately mitigated the Historical and Cultural Impacts, we require the "No Project" option be adopted by the city council.

HAZARDS and HAZARDOUS MATERIALS IMPACTS

Tabor found evidence of hazardous substances and or petroleum products within the project area during the ISA investigation that qualifies as recognized environmental conditions. A former gasoline service station is considered a REC and anticipated to be a source likely to affect the project area. Soils within the project area may contain naturally occurring asbestos. Hydrocarbon odors were also identified during geologic investigations, but no mitigation measures were offered. These conditions have the potential to cause significant negative impacts that must be adequately addressed the full and potential ramifications and associated costs. To continue with this project before identifying the actual extent of the hazardous and toxic material present is reckless and irresponsible. Several underground Oil or Gas Tanks may be buried under parking lot.

Because the city has not adequately mitigated the Hazards and Hazardous Impacts, we require the "No Project" option be adopted by the city council

LAND USE and PLANNING

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

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

dwindling list is likely due to the State's aggressive bridge replacement program. Because the city has not adequately mitigated the Land Use and Planning, we require the "No Project" option be adopted by the city council. Because the city has not adequately mitigated the Land Use and Planning Impacts, we require the "No Project" option be adopted by the city council.

INCONSISTENCY AREA PLANS and POLICIES

The project is not consistent with adopted local plans, project analysis is outdated and inaccurate. There is no indication of the real purpose of the project, no problem description of what the issues are to be resolved, why the project was proposed in the first place, and what benefits are expected from the completion of the project. Describing the projected Level of Service in the year 2025 is misleading in the extreme, because any traffic improvements in the immediate project area would only lead to congestion and delays in all areas adjacent to and just outside the project area. Because the city has not adequately mitigated the Inconsistency Area Plans and Policies, we require the "No Project" option be adopted by the city council.

NOISE IMPACTS

During construction noise would increase in the area and traffic would be affected for 2 years.

Businesses would suffer possibly causing possibly causing businesses to close.

Because the city has not adequately mitigated the Noise Impacts, we require the "No Project" option be adopted by the city council.

URBAN DECAY IMPACTS

Some businesses in the Project Area would close or suffer losses because of the length of time the construction project would take to complete. Some business would have permanent negative effects caused by egress and ingress into and exiting driveways that fall within the intersection boundaries. No consideration has been given to mitigate these permanent problems.

Because the city has not adequately mitigated the Urban Decay Impacts, we require the "No Project" option be adopted by the city council.

GROWTH INDUCING IMPACTS

The project *will* induce additional growth in the areas north of Clay Street, because post project Clay Street will be able to support additional traffic.

The Cottonwood Park Planned Development Phases 4 & 6 are already in progress involving unknown and the completion of the project will most certainly generate additional traffic. The Cottonwood project involves the "continuation of Constellation Drive between Clay Street and Poverty Hill Road/Roddan Court" and "The project also is designed to facilitate a future connection to an undeveloped parcel located to the east." (Community Development Department Planning Commission Staff Report, Cottonwood Park

Planned Development Phases 4 & 6, September 7, 2010.) In addition, the Cottonwood Development Plan includes a propane farm which will cause propane delivery trucks to utilize Clay Street for access. The EIR needs to measure and calculate the cumulative impacts that these future residential developments will create. To mitigate traffic on clay street traffic from Cottonwood phases 4 & 6 should have additional egress to Poverty Hill Road, Morrene Drive or both roads. Usage of Clay Street will be affected by the planned new construction of the Mosquito Road and Highway 50 exit and new on-ramp. The very nature of this "project" is Growth Inducing. Because the city has not adequately mitigated the Growth Inducing Impacts, we require the "No Project" option be adopted by the city council. Cumulative Effects and Growth Inducement

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

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

In fact, the realignment of Clay Street and the replacement of the Clay Street Bridge are for the express purpose of assisting residential developments north of and accessed by way of Clay Street, and will public infrastructure into an undeveloped area." While that statement may be technically correct, this project will by default support the extension of new roads into currently undeveloped areas, and will indirectly induce growth in the nearby neighborhoods.

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

The Cottonwood Park Planned Development Phases4 & 6 are already in progress involving 39 singlefamily residential parcels and the completion of the project will most certainly generate additional traffic. The Cottonwood project involves the "continuation of Constellation Drive between Clay Street and Poverty Hill Road/Roddan Court" and "The project also is designed to facilitate a future connection to an undeveloped parcel located to the east." (Community Development Department Planning addition, the Cottonwood Development Plan includes a propane farm which will cause propane delivery trucks to utilize Clay Street for access. The MND needs to measure and calculate the cumulative impacts that these future residential developments will create, and it has not done so

PARKING IMPACTS UTILITIES AESTHETIC IMPACT

Within the sphere of influence of the project, residents on clay street from the underpass to Coleman Street will only be able to park on one side of the street because of the width of the street required to

conform to roadway standards. Have the residents Clay Street been notified or had an opportunity to have public comment in the public meetings and scoping process.

In addition to the 36+ parking spots loss from the Ivy House parking, an 15-20 parking spots used daily will be loss from the underpass to Grandview Street. The daily usage is between 15 -20 cars using the street parking. Total loss of parking would be 55+ spots.

Proposed mitigated parking is further away from businesses with lack of lighting, walkways and has safety concerns. Because the city has not adequately mitigated the Parking and Utilities Impact, we require the "No Project" option be adopted by the city council.

Community Interaction

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

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

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

Potential Impacts : *other impacts are given within the body of this report.

1. Metal Covert Drain from Cedar Ravine Creek to Hangtown Creek running south and north is located under Main Street, Clay Street and Ivy House Parking Lot and is suspected of having old framed wooden areas that are now voids of space that could collapse or cause extensive rust and corrosion on the covert drain pipe. The condition of metal covert pipe interior and exterior is unknown.
2. Loss of Pocket Park adjoining the Ivy House parking lot. This is the only ADA access to Hangtown Creek for viewing in Placerville and would be removed by project plans.
3. The Project does not conform to the "small town" quality and feeling that is heavily shaped by the attributes, integrity, historical character and design scale of existing residential and commercial

neighborhoods within the sphere of influence of proposed project. The preservation, historic, architectural, cultural and/or aesthetic importance is essential in retaining this community character.

4. The scale of the overall project is too large for the area and would permanently change the historical and cultural presence of the project and surrounding area.

5. Only two projects alternatives are now being considered with a No Project alternative, no citizen project proposals were given any consideration. The citizens in this very controversial

6. The proposed project (s) are motivated by the grant money and not the needs or wishes of the residents.

The citizens of Placerville should not be required to pay for projects that do not maintain the historical and cultural resources of Placerville just because of State and Federal Government incentives and desired outcomes.

7. The project is growth and traffic inducing which will promote growth without consideration for the environment and character of our town.

8. Proposed mitigated parking too far away from the project to benefit the area which will be impacted.

9. Traffic analysis of roads is incomplete and needs to cover entire downtown and all areas within the sphere of influence of area.

10. Ivy House parking lot hazardous and petroleum waste testing underground is incomplete.

11. New egress and ingress in Ivy House parking lots, existing parking lots and business parking lots within the intersection boundaries that will cause delay in future traffic movement and could create safety hazards including vehicle and pedestrian hazards. Adding a parking lot requiring an exit in the same location as the Clay Street and Main Street intersection nullifies the purpose for moving clay street.

12. Growth inducing effects are accumulative and influence the intersection at Clay Street, Cedar Ravine. The entire Historic Main Street is approaching the maximum traffic threshold at peak hours. This project will increase traffic to intersections already operating at high traffic at peak hours which could cause traffic back up to the project intersection itself, creating increased gridlock.

CEQA compliance requires cumulative impacts to consider the effects of past projects, the effects of other current projects and the effects of probable future projects. Cumulative effects must be addressed due to this project creating and allowing for additional traffic capacity and more growth in the near future. In fact, the realignment of Clay Street and the placement of the Clay Street Bridge are for the express purpose of assisting residential developments north of and accessed by way of Clay Street, and will certainly contribute to increased growth. This project will by default support the extension of new roads into currently undeveloped areas, and will indirectly induce growth in the nearby neighborhoods.

13. Cottonwood 4 and 6 and other future planned development in Clay Street area will add new traffic to the project area. Other alternatives should be further explored as a ingress and egress from upper Clay Street and Enterprise Drive such as Poverty Hill Road and Morrene Drive off Roddan Court.

14. The Parking Loss estimated on Clay Street to be the 36+ parking spots loss from the Ivy House parking, and 15-20 parking spots on Clay Street used daily will be loss from the underpass to Grandview

Street from street parking. The daily usage is between 15 -20 cars using the street parking. Total loss of parking 55+ spots. This needs to be included to the impact of the project.

15. In many places Clay Street is too narrow for the two lane street and street parking with increased traffic. Some street parking may need to be eliminated in front of Clay street residential homes due to hazardous conditions caused by increased traffic.

16. The public involvement process or lack of involvement in choosing alternatives was denied by the city at the scoping meeting. The public was not allowed to participate in the selection of the alternatives for the "Project". The city council promised on Oct. 22, 2013 to have two additional community design meetings to show goodwill to the public. Then on Aug. 27 at the scoping meeting the public was told the alternatives were already determined and no public comment would be allowed in discussing alternatives. The city has now pulled out for a unknown reason the main featured part of their project, the "Roundabout". Now there are basically three choices, lights, stop signs or "do nothing". The first two are poor choices. The EIR should be stopped until the public has access to design workshops with the city to determine the best projects available before the people are asked to choose the "No Project" option. Of the three options the, the city decided to withdraw in July 2014 the "Roundabout Option" at the intersection.

17. The community will be impacted by the loss of Farmers Market and other events at the Ivy House parking lot.

18. *Federal and State Bridge Standards for Clay Street* - Two-lanes are required by current federal and state standards based on existing traffic volumes. What is the traffic volume that requires a two lane bridge on Clay Street? What is the traffic volume that would only requires a one lane bridge on Clay Street?

Summary

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

Throughout the project the public ahs recommended that the city build an additional public parking lot at the Locust Street south of Highway 50 location, complete the extension of the El Dorado Trail between Clay Street and Bedford, and perform the neglected maintenance on the streets, sidewalks, landscaping, parking lot and bridge rather than move forward with this project.

The people of Placerville would derive more benefit from this solution to a problem that doesn't exist than that proposed by the revised Clay Street Realignment and Bridge Replacement and signalized or stop signs at the Main Street/Cedar Ravine/Clay Street Project. We request that the City withdraw the present EIR from further processing at this time until the issues raised above have been satisfactorily resolved.

Respectfully,

A handwritten signature in black ink, appearing to read 'David Price', written over a horizontal line.

David Price
Friends of Historic Hangtown

David Cole
1302 Sourdough Lane
Placerville, Calif.95667

09/08/2014

Mr. Rivas
Development Services Director
3101 Center St.
Placerville Calif.

RECEIVED

SEP 08 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

Dear Mr. Rivas

The cost of the Clay St. Bridge and realignment project alone is reason to object to it. As per recent city chats and city council meetings it appears the citizens of Placerville want to see their tax dollars spent on more practical projects. I'm sure a majority of them would agree we lose far more than we gain by this project and I will lose an opportunity to bring the bike trail, Hang town creek and downtown together, and not divide it up unnecessarily with this realignment.

The location the city has chosen to mitigate the loss of parking spaces in no way offsets the convenience and proximity to downtown that the Ivy House lot provides.

The three alternatives are limited in scope and should include other choices. Why not consider a signaled control at Clay St. and Main St. or making Clay St. a right turn only onto Main St. Another alternative would be to simply widen Clay St. South of the bridge, set back the stone wall one row of parking spaces.

We should encourage the slowing down of traffic as it approaches the Clay Street Bridge, walking trail and Main St. There are many narrow streets in our town which could be designated as obsolete, why single out the Clay St. Bridge with its historical charm and intimacy with Hang town creek? This area will serve us better underdeveloped to help create a more walk able community, not a speedway with additional traffic to this section of Main St. I have traveled this intersection to and from work for over thirty years and have experienced no problems.

I object to moving the Druids monument, the possibility that this historic asset and nearby businesses may be damaged during the destruction and construction of this project. Consider the financial losses to the surrounding business.

A heritage cork oak and redwood tree are endangered by this project.

Fish and wildlife habitat will be destroyed.

This project eliminates the only wheelchair, and baby stroller access to hang town creek

This project encourages and unfairly favors, without a doubt, further development of property on upper Clay Street and Cottonwood 4 and 6, which is just waiting for the green light to proceed.

The backup of traffic from any signals here will surely block access to several existing business parking lots.

There are alternatives which will relieve any congestion perceived at this intersection and at the same time preserve our unique small town.

Sincerely yours, David Cole.

A handwritten signature in cursive script that reads "David Cole". The signature is written in dark ink and is positioned below the typed name.

City of Placerville
Scoping Meeting
August 27, 2014

RE: SCOPING MEETING FOR CLAY STREET BRIDGE REPLACEMENT AND REALIGNMENT PROJECT NOP

I would like to make brief comments for the Scoping Meeting. I have attached a detailed list of comments on the NOP.

First: While stating that the project will improve traffic and LOS, the City fails to provide current traffic and accident study data that would support the purpose and justifications put forth for this project.

Second: The NOP fails to consider off-site impacts of increasing the capacity of Clay Street. It will increase traffic and congestion at Bedford and Pacific Streets, and increased capacity will contribute to growth in parcels north of Highway 50.

Third: The NOP fails to include documents submitted for previous editions of this project. Examples include: the October 10, 2010 Letter from the California State Office of Historic Preservation, a December 29, 2009 Caltrans letter, and the Archaeological Survey Report and an Extended Phase 1 Report referenced in that letter.

Forth: Because this project has been previously presented and discussed in multiple public meetings, the NOP is deficient for not including letters and comments previously provided for earlier analyses. The City should not be entitled to rename the project and bring it forward without including the significant body of work already done by members of the public.

Fifth: This project will have impacts on businesses in the adjacent area. For example, the Farmer's Market is an important resource for residents County-wide and it's disruption is not adequately addressed. The benefits of this project are unclear but the costs of construction are high and focused on a small number of businesses.

The City states that this project will improve the intersection without documenting the conditions that require fixing. This unusual intersection is exactly the kind of artifact from earlier times that produces a historic city. To destroy this area in service of efficient traffic flow seems to contradict the City's policies to preserve historic areas. Without clear evidence of need the City should be committed to preserving our History, not bulldozing it.

Sincerely;

Dale R. Pierce, DDS
3171 Washington St.
Placerville, CA

Sent by email and hand delivery
Attachment: Specific comments on the NOP

August 26, 2014

City of Placerville
Mr. Pierre Rivas
Development Services
3101 Center Street
Placerville, CA 95667

RECEIVED
AUG 28 2014
CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

RE: CLAY STREET BRIDGE REPLACEMENT AND REALIGNMENT PROJECT NOP

Thank you for the opportunity to comment on the August 2014 Notice of Preparation (NOP) Initial Study. First are several global comments about the project, and then specific comments about Sections of the Initial Study.

Part 1: Project as a Whole

Comment 1:

The City claims in the project description that the project will “improve” this intersection, and that Main Street is “frequently congested”. As someone who uses this intersection multiple times every day I do not find this to be true. Any past studies fail to reflect the economic changes that have reduced projected traffic growth. The City cites no recent traffic studies to support this assertion.

Comment 2:

The NOP claims that this project has no traffic impacts outside the project area, as it is only a reconstruction and realignment of an existing intersection. However, it is specifically designed to increase the capacity of Clay Street, and as such will bring increased traffic to Main Street and increased impacts at Main and Bedford. Again there is a lack of recent traffic studies that would show that that intersection, and also Pacific Street at Cedar Ravine are already above capacity and unable to accommodate increased traffic. The Evaluation of Environmental Impacts requires consideration of off-site, cumulative, indirect and operational impacts.

Comment 3:

This project will stimulate increased growth. The City ignores it’s own documents and statements with regard to serving undeveloped parcels adjacent to Clay Street. The City should be required to include in this NOP those statements that it has previously cited to support earlier versions of this project since this project is intended to increase the capacity of Clay Street for the benefit of those properties.

Comment 4:

On Page 7 of the NOP the City claims that the “proposed project is necessary to improve roadway safety, reduce congestion and meet current and future traffic needs.” In their

consideration of Project Alternatives the City states it is “working with Caltrans and other stakeholders to develop reasonable alternatives to meet the project purpose and need while minimizing impacts to the community and environment.” The NOP lacks evidence from traffic studies, accident statistics or current traffic projections to support those assertions. There is no source list of supporting information provided to the public.

The City has been pursuing this project since the 2005 Streetscape project. During that time they have never clearly stated the need this project is intended to satisfy. At different times there have been different reasons for proceeding, while all the impacts remain. Without a clear statement of benefit it is not possible to analyze cost versus benefit. As such that lends overwhelming support to the No Project Alternative.

Comment 5:

Because this project has been previously presented and discussed in multiple public meetings, the Initial Study is deficient for not considering and including the letters and comments previously provided for earlier analyses. The City should not be entitled to rename the project and bring it forward without including the significant body of work already done by members of the public. The City has in its possession numerous letters and comments that are directly applicable to the current version of the project that need to be included and addressed. (See Section V Cultural Resources below)

Comment 6:

The Ivy House Farmer’s Market is an important public resource that is significantly impacted by both the construction and ultimate design of the project. This issue deserves consideration and review as an item of its own due to the difficulty of mitigating the destruction of this public space

Comment 7:

The City needs to consider the impact of construction on adjacent businesses. Construction over an extended period threatens to destroy or eliminate those businesses dependent on public access. In the absence of an evaluation of the intended benefit of the project it is impossible to evaluate a cost benefit for the city as a whole.

Comment 8:

This unusual intersection is an artifact from earlier times and the kind of detail that produces a historic city. To destroy this area in service of efficient traffic flow seems to contradict the City’s policies to preserve historic areas.

.Part 2 Specific Deficiencies

Section I Aesthetics: a) Scenic Vista –

The current alignment is the result of the history and previous buildings of that area, and a redesigned “modern” intersection that includes moving the Druid monument will significantly impact a unique streetscape that is a historic artifact.

Section III Air Quality a-c)

The City claims improved traffic and congestion in the project area without support. It fails to consider off-site impacts at adjacent intersections

Section V Cultural Resources a-d)

The City cites a Caltrans letter of 2004 regarding the historic significance of the Clay Street Bridge, but fails to include a December 29, 2009 Caltrans letter. In addition, that 2009 letter cites the Archaeological Survey Report and an Extended Phase 1 Report that were not included in the NOP. Additionally the City fails to include an October 10, 2010 letter from the California State Office of Historic Preservation that “strongly advise the City to properly evaluate the potential significance of the bridge and adopt feasible mitigation measures which avoid or reduce all adverse impacts to the potential historical resource”. They also pointed out that the City used inappropriate criteria to review the bridge. The City’s failure to include these documents is significant.

Section VII Greenhouse Gas Emissions a-b)

As previously noted, the City has failed to include traffic studies that would make it possible to evaluate the off-site increased congestion from increased traffic from Clay Street.

Section VIII Hazardous Materials:

There are previous studies and public comments that indicate hazardous materials (e.g. Fuel tank). These studies should be incorporated and reviewed.

Section X Land Use and Planning:

- a) There are historic areas and buildings to the South, the West and the North of the project. A large volume modern intersection in the center of those areas does divide the community.
- b) The parking spaces to be lost are inside a parking district and are funded by landowner fees and intended to benefit those businesses. Replacing those spaces with more distant spaces outside the parking district is a significant impact. Lack of parking is a major factor for downtown businesses and any impact that reduces parking is very significant.

Section XII Noise c)

The NOP fails to consider the cumulative impact of increased traffic in this area as a result of increased capacity and traffic from Clay Street.

Section XIII Population and Housing a)

The no impact finding fails to consider that one purpose of this project is to increase Clay Street capacity to service inbuilt parcels adjacent to it. The City has previously commented on those areas of growth and has failed to include their comments in the NOP.

Section XIV Public Services c-d)

The City fails to include that the project will remove an existing Park that provides the only wheelchair accessible park on Hangtown Creek, which is also the ONLY park on Hangtown Creek. As a partner in building the Ivy House Park, the City considered it an appropriate use of city funds at that time, and the need for public spaces has not decreased.

- e) The City should include impacts on the Parking District that was established to provide a public benefit.

Section XV Recreation a-b)

Impact of the removal of a public, wheelchair accessible Park should be considered; and for many people loss of the Farmer’s Market would impact their recreational values.

Section XVI Transportation/Traffic a-b)

See comments 1 and 2. The City's assertion of reduced congestion lacks support, fails to consider off-site impacts and fails to reference any congestion management study or plan.

Section XVII Utilities and Service Systems c)

Numerous storm water and drainage facilities and pipes are visible entering Hangtown Creek within the project area, and need to be considered. In addition see comment 3; this project has the potential to induce growth and those dwellings will require water supply.

References:

This section is incomplete and should include all the materials in the City's possession that are necessary for the public and agencies to comment.

Sincerely;

A handwritten signature in cursive script, appearing to read "Dale R. Piece".

Dale R Piece DDS
3171 Washington St
Placerville, CA 95667

City of Placerville
Mr. Pierre Rivas
Development Services
3101 Center Street
Placerville, CA 95667

September 9, 2014

RECEIVED

SEP 09 2014

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

Re: Clay Street Realignment Project NOP.

I have additional comments regarding the Clay Street Realignment Project EIR;

- 1) The list of alternatives has been restricted needlessly. A member of the public pointed out at the Scoping meeting that the bridge could be replaced with a historically compatible and functional bridge of only slightly greater size without requiring the complete destruction of the area. Making it a right-in, right-out only intersection would alleviate the traffic issues on Clay Street. This option should be considered for the project.
2. I point out again that the project lacks adequate traffic studies, and that the City has failed to consider and include documents that apply to this project, including
 - a. September 18, 2008 Memorandum from Randy Pesses to John Driscoll. Subject: Traffic Impact Mitigation Fee Program Presentation.
 - b. March 11, 2008 Traffic Impact Analysis for Marshall Medical Center Expansion, prepared by KDAnderson & Associates.Members of the City Council also are members of the Marshall Board and have access to these documents and the planning they reference.
3. Specifically, I point out that the traffic studies referenced in the public Scoping Meeting are too restricted in area to evaluate impacts thru this project or in adjacent areas affected by the project. There has been no consideration of the volume of traffic from upper Clay Street that currently exits that area thru Mosquito Road, nor is there information about the Cedar Ravine/Pacific Street intersection.
4. The expansion plans for Marshall Hospital and additional growth in the Clay Street area are significant impacts on Placerville and the growth inducing potential of this project should be considered.
5. The immediately adjacent Historic areas have been identified as deserving of Preservation and the construction and traffic impacts on those areas deserves consideration

Thank you for the opportunity to comment

Dale R Pierce DDS
3171 Washington St
Placerville, CA 95667

Sent by email and US Mail

Reyna Schenck

From: Kelly Jackson
Sent: Monday, March 09, 2015 10:21 AM
To: Reyna Schenck
Subject: FW: Clay Street Realignment Project

Follow Up Flag: Follow up
Flag Status: Completed

Kelly Jackson
NEPA Coordinator | Transportation Planning Services
PMC | 2729 Prospect Park Drive Suite 220, Rancho Cordova CA 95670
(916) 517-4404 (direct) | (916) 549-6516 (cell)

From: Pierre Rivas [mailto:privas@cityofplacerville.org]
Sent: Wednesday, February 11, 2015 2:43 PM
To: Kelly Jackson
Subject: Fwd: Clay Street Realignment Project

Kelly: FYI. -Pierre

----- Forwarded message -----

From: Lynne Hunter <lhunter@cityofplacerville.org>
Date: Fri, Jan 23, 2015 at 1:37 PM
Subject: Fwd: Clay Street Realignment Project
To: Pierre Rivas <privas@cityofplacerville.org>

----- Forwarded message -----

From: Beverley Pierce <dpierce@innercite.com>
Date: Fri, Jan 23, 2015 at 1:25 PM
Subject: Re: Clay Street Realignment Project
To: Lynne Hunter <lhunter@cityofplacerville.org>

Dear Ms Hunter;

I would like to comment on Agenda Item 12.2 for the 12/27/15 City Council Meeting, and I hope you can provide these comments to both the Council and to Mr. Rivas. I am resending my letter of 9/9/14 previously sent to Mr. Rivas about the NOP as I feel those comments are still germane.

With regards to the Clay Street Realignment, I feel that the list of alternatives has not been sufficiently considered. The justification for construction of this project has not been demonstrated, and I feel that much more minimally invasive alternatives should be considered- specifically a historically compatible bridge in the current location with turn restrictions to minimize traffic delays.

It seems premature to let the design contract before proper consideration of alternatives and the EIR.

Sincerely yours

Dale R Pierce, DDS
3171 Washington St.
Placerville, CA 95667

On Tue, Sep 9, 2014 at 1:44 PM, Dale Pierce <dpierce@innercite.com> wrote:

City of Placerville
Mr. Pierre Rivas
Development Services
3101 Center Street
Placerville, CA 95667

September 9, 2014

Re: Clay Street Realignment Project NOP.

I have comments regarding the Clay Street Realignment Project EIR;

1) The list of alternatives has been restricted needlessly. A member of the public pointed out at the Scoping meeting that the bridge could be replaced with a historically compatible and functional bridge of only slightly greater size without requiring the complete destruction of the area. Making it a right-in, right-out only intersection would alleviate the traffic issues on Clay Street. This option should be considered for the project.

2. I point out again that the project lacks adequate traffic studies, and that the City has failed to consider and include documents that apply to this project, including;

- a. September 18, 2008 Memorandum from Randy Pesses to John Driscoll. Subject: Traffic Impact Mitigation Fee Program Presentation.
- b. March 11, 2008 Traffic Impact Analysis for Marshall Medical Center Expansion, prepared by KDAnderson & Associates.

Members of the City Council also are members of the Marshall Board and have access to these documents and the planning they reference.

3. Specifically, I point out that the traffic studies referenced in the public Scoping Meeting are too restricted in area to evaluate impacts thru this project or in adjacent areas affected by the project. There has been no consideration of the volume of traffic from upper Clay Street that currently exits that area thru Mosquito Road, nor is there information about the Cedar Ravine/Pacific Street intersection.

4. The expansion plans for Marshall Hospital and additional growth in the Clay Street area are significant impacts on Placerville and the growth inducing potential of this project should be considered.

5. The immediately adjacent Historic areas have been identified as deserving of Preservation and the construction and traffic impacts on those areas deserves consideration

Thank you for the opportunity to comment

Dale R Pierce DDS

3171 Washington St
Placerville, CA 95667

--

Lynne M. Hunter, Administrative Secretary
City of Placerville Development Services Department
Planning [530.642.5252](tel:530.642.5252) - Building [530.642.5240](tel:530.642.5240) - Engineering [530.642-5250](tel:530.642-5250) - fx. [530.295.2510](tel:530.295.2510)
City Website : www.CityofPlacerville.org
Office Hours: Monday - Thursday 7:30 a.m. - 5:30 p.m.; Friday 8:00 a.m. - 3:00 p.m.

Dale R. Pierce
Inter-County Properties Co.
dpierce@innercite.com

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Lynne M. Hunter, Administrative Secretary
City of Placerville Development Services Department
Planning [530.642.5252](tel:530.642.5252) - Building [530.642.5240](tel:530.642.5240) - Engineering [530.642-5250](tel:530.642-5250) - fx. [530.295.2510](tel:530.295.2510)
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--

Pierre Rivas, Director
Development Services Department
City of Placerville
(530) 642-5569
privas@cityofplacerville.org

**TABLE A-1
SUMMARY OF COMMENTS ON NOP**

Topic Area and Comments	Where Addressed in Draft EIR
Project Description	
Need for project and project objectives should be clearly defined	See Section 2.0, Project Description.
Culvert replacement should be described and evaluated	See Section 2.0, Project Description, for all related project-proposed improvements. The portion of the Cedar Ravine drainage culvert between Main Street and the existing bridge is expected to be affected by the Clay Street realignment and parking lot reconstruction, and modification of the culvert may be required.
Should state there is federal funding and requires NEPA compliance	The National Environmental Policy Act (NEPA) is being addressed under a separate environmental review process. However, technical studies prepared for NEPA compliance are used in this Draft EIR.
Design and renderings needed so public can have opportunity to review	See Section 2.0, Project Description, for all related project-proposed improvements as well as the current conceptual renderings of the project based on the current design details.
Parking lot should have shade and landscaping	Details on the landscaping and shading will be provided as part of the final design.
Replacement parking locations should be identified	See Section 2.0, Project Description, for all related project-proposed improvements and proposed parking adjustments.
Aesthetics	
Loss of "small town" feel and character	See Section 4.1, Aesthetics, for analysis of project visual resources impacts.
Realigned intersection will be out of scale with surroundings	
Negative impact on visual character	
Compatibility of new bridge with historic downtown area; new bridge would not be "historic-looking"	
Druid Monument is important element of visual character	
Impacts related to loss of the overlook, trees and shrubs, bridge, and views from Highway 50 should be evaluated, and requires mitigation	
Cork oak and stone landscape planter are important visual elements and loss should be mitigated	
Tree planting plan inadequate because replacement trees will take a long time to mature and this will affect views and character	
Scenic vistas will be affected	
Loss of the park on Hangtown Creek is significant because it would remove the viewing area	See Section 4.1, Aesthetics, which evaluates potential impacts related to views.

**TABLE A-1
SUMMARY OF COMMENTS ON NOP**

Topic Area and Comments	Where Addressed in Draft EIR
<i>Air Quality</i>	
Emissions from idling would increase	See Section 4.2, Air Quality, for analysis of project air quality impacts.
Project would shift where emissions occur	
How will project improve air quality?	
<i>Biological Resources</i>	
Cork oak in the stone planter and redwood tree near the bridge should be preserved	See Section 4.1, Aesthetics, and Section 4.3, Biological Resources, for analysis of the project's impacts on trees.
Creek setbacks are needed	See Section 4.3, Biological Resources, for analysis of project impacts on Hangtown Creek.
Hangtown Creek should be protected	
<i>Cultural Resources</i>	
Loss of historic character	See Section 4.4, Cultural Resources, for impacts on historic resources in the project area.
Historical significance of Clay Street Bridge, retaining wall, Druid Monument, and Main Street requires evaluation	
Rock wall around planter is historic and its loss should be mitigated	
EIR should look at construction impacts on adjacent historic structures	
Records search should be performed and an archaeological survey conducted, if determined to be necessary; Native American resources should be determined and mitigation to protect resources identified	
Additional plaques should be placed around Druid Monument	
Project will bisect historic areas of city	
<i>Greenhouse Gas (GHG)</i>	
Project will have GHG emissions	See Section 4.5, Greenhouse Gas Emissions, for an analysis of GHG emissions associated with the project.
<i>Growth Inducement</i>	
Project will increase potential for development north of US 50 and vacant parcels downtown result in associated environmental impacts that should be studied	See Section 5.0, Other CEQA Considerations, for an analysis of growth inducement associated with project improvements.
<i>Hazardous Materials</i>	
Contamination from underground fuel tank at parking lot	See Section 4.6, Hazards and Hazardous Materials, for an analysis of potential contamination issues in the project area (including underground storage tanks).
<i>Hydrology (Flooding)</i>	
Analysis should evaluate flood problems elsewhere in Hangtown and Cedar Ravine creek watersheds	See Section 4.7, Hydrology and Water Quality, for an analysis of flooding impacts associated with the project.
High clearance bridge is needed to protect from flooding and guard rails to prevent vehicles from plunging into creek during extreme conditions	As described in Section 2.0, Project Description, the proposed replacement of the bridge structure would improve the

**TABLE A-1
SUMMARY OF COMMENTS ON NOP**

Topic Area and Comments	Where Addressed in Draft EIR
	operation and safety of the bridge and would include railings.
Land Use	
Effect on Farmers Market should be studied	See Section 4.8, Land Use, for an analysis of impacts to the Farmers Market and businesses in the project area.
Construction would have negative effects on business and access	
Loss of parking will negatively affect businesses	
Urban decay needs to be evaluated, businesses will lose money	
Consistency with Main Street Streetscape Design Development Plan and Placerville General Plan should be evaluated	See Section 4.8, Land Use, for an analysis of project consistency with all applicable plans.
Compatibility with General Plan Community Design Element	
Project will divide bike trail, creek, and downtown	See Section 4.8, Land Use, for an analysis of potential physical division of the community by the project.
Noise	
Additional traffic will increase noise	See Section 4.9, Noise, for an analysis traffic noise impacts from the project.
Traffic and Parking	
Will increase traffic flow and cause future impacts	See Section 4.10, Transportation and Circulation, for analysis of traffic impacts, including impacts to other intersections in the project area as well as cumulative traffic impact analysis.
Traffic counts should be done on weekend when US 50 is backed up	
Traffic peak-hour counts should account for when school is open and shift change at the hospital	
Traffic study should include other intersections not just Clay Street and also cumulative impacts with other projects	
Project will increase cut-through traffic in neighborhood north of US 50 when US 50 is congested	
How will project improve congestion?	
Traffic study is needed to justify proposed improvements	See Section 4.10, Transportation and Circulation, for the analysis of traffic impacts that is based on a traffic study.
Relocation of Druid Monument could improve intersection safety and easier to see	See Section 4.10, Transportation and Circulation, for the analysis of traffic impacts, including safety impacts.
Improved traffic flows will increase speeds and potential for accidents	
Realigned intersection will cause more collisions	
Left turn from Clay onto Main is dangerous and project would help alleviate hazards	
Traffic calming measures should be considered	
Access to/from two new parking lots needs to be described, could be confusing	See Section 4.10, Transportation and Circulation, for the analysis of traffic impacts, including impacts to project changes in parking.
Replacement parking locations should be clearly identified, some pose safety concerns because they are not visible from Main Street	
Loss of parking will negatively affect businesses	

**TABLE A-1
SUMMARY OF COMMENTS ON NOP**

Topic Area and Comments	Where Addressed in Draft EIR
Safety of existing Clay Street/Main Street intersection should be evaluated	See Section 4.10, Transportation and Circulation, for the analysis of traffic impacts, including safety impacts.
Curbs should be improved for accessibility (ADA)	See Section 2.0, Project Description, for proposed crossing improvements and ADA compliance.
Construction could cause transit delays as a result of lane closures	See Section 4.10, Transportation and Circulation, for the analysis of traffic impacts, including transit impacts.
Backup from a signal would block access to businesses	See Section 4.10, Transportation and Circulation, for the analysis of traffic impacts.
Utilities	
Utility relocations should be evaluated	See Section 2.0, Project Description, for information regarding potential utility relocations.
Water Quality	
Storm drains should be watershed-friendly	See Section 4.7, Hydrology and Water Quality, for an analysis of flooding and water quality impacts associated with the project.
Various state and federal permits pertaining to water quality may be required	Section 4.7, Hydrology and Water Quality, for information regarding water quality permits that would be applicable to the proposed project.
Alternatives to Project	
Two alternatives (stop sign and signal) aren't enough. More alternatives are needed and should have public review and input.	See Section 6.0, Alternatives, for an evaluation of project alternatives, including alternatives suggested during the NOP scoping process.
EIR should consider these alternatives: <ul style="list-style-type: none"> • Retain existing Clay Street alignment with bridge replacement • Widen Clay Street south of bridge only • Right turn only at Clay and no bridge replacement • No realignment, signal at Clay only • Roundabout (reconsider this as alternative) • Close the parking lot • Rehabilitate the bridge instead of replacing it • Close Clay Street to vehicle traffic and have pedestrian/bicycle only 	
Other Concerns	
Quality of life will be affected	Pursuant to CEQA Guidelines Section 15131(a), social and economic effects of a project are not treated as significant effects on the environmental. Thus, these issues are not addressed in the Draft EIR.
Cost-benefit analysis should be done	