

*Final  
Environmental Impact Report*

***Silva Valley Parkway Interchange***

*with*

***U. S. Highway 50***



*Lead Agency:*

***El Dorado County  
Department of Transportation***

*Submitted by:*

***Jones & Stokes Associates, Inc.***

*February 1990  
SCH #88050215*

**ATTACHMENT M**

22-2252 C 1 of 24

NOTICE OF DETERMINATION

FILE NO. Silva Valley Interchange



TO: COUNTY CLERK  
County of El Dorado  
330 Fair Lane  
Placerville, CA 95667

FROM: EL DORADO COUNTY PLANNING DEPT.  
360 Fair Lane  
Placerville, CA 95667

SUBJECT: Filing of NOTICE OF DETERMINATION in compliance with Section 21108 or 21152 of the Public Resources Code.

NAME OF APPLICANT: El Dorado County Department of Transportation

ASSESSOR'S PARCEL NO. \_\_\_\_\_ SCH NO. \_\_\_\_\_

AREA PLAN: El Dorado Hills/Salmon Falls SECTION: \_\_\_\_\_ TOWNSHIP: \_\_\_\_\_ RANGE: \_\_\_\_\_

NEAREST COUNTY ROAD INTERSECTION: \_\_\_\_\_

GENERAL PLAN AMENDMENT  REZONING: FROM: \_\_\_\_\_ TO: \_\_\_\_\_

TENTATIVE PARCEL MAP  SUBDIVISIONS TO SPLIT \_\_\_\_\_ ACRES INTO \_\_\_\_\_ LOTS

SUBDIVISION (NAME) \_\_\_\_\_

SPECIAL USE PERMIT TO ALLOW: \_\_\_\_\_

OTHER: Location of the Silva Valley Interchange with U. S. Highway 50 - Ridge Design

The EL DORADO COUNTY Board of Supervisors has  approved  disapproved this project on 2-20-90, and made the following determinations:  
(date)

- 1) Project  will  will not, have a significant effect on the environment.
- 2)  An Environmental Impact Report was prepared pursuant to provisions of CEQA.  
 A Negative Declaration was prepared pursuant to provisions of CEQA.
- 3) Mitigation Measures  were  were not, adopted for this project.  
A Statement of Overriding Considerations  was  was not, adopted.

\*The Environmental Impact Report or Negative Declaration and Record of Project Approval may be reviewed at the EL DORADO COUNTY PLANNING DEPT.

Margaret E. Moody  
Prepared by

2-20-90  
Date

Public Resources Code Section 21152(A) requires local agencies to submit this information to the County Clerk. The filing of the Notice starts a 30-day Statute of Limitations on court challenges to the approval of the project under Public Resources Code Section 21167. Failure to file the Notice results in the Statute of Limitations being extended to 180 days.

FOR USE BY COUNTY CLERK

2-20-90  
Margaret E. Moody

FINAL  
ENVIRONMENTAL IMPACT REPORT  
FOR THE  
SILVA VALLEY PARKWAY/  
U.S. HIGHWAY 50 INTERCHANGE

County of El Dorado, California

State Clearinghouse Number 88050215

Lead Agency:

County of El Dorado  
Department of Transportation  
2441 Headington Road  
Placerville, CA 95667  
Contact: Scott Chadd/Bill Pearson  
916/626-2347

Technical assistance provided by:

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Sacramento, CA 95816  
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Peak & Associates, Inc.

February 1990

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## **CHAPTER 1. Purpose and Format of the Final EIR**

Under the California Environmental Quality Act (CEQA), El Dorado County as lead agency is required after completion of a Draft Environmental Impact Report (EIR) to:

1. consult with and obtain comments from public agencies having jurisdiction by law with respect to the proposed project, and
2. provide the general public with opportunities to comment on the Draft EIR.

El Dorado County also is required to respond to significant environmental points raised in the review and consultation process.

This Final EIR has been prepared to respond to the public agency comments received on the Draft EIR for the Silva Valley Parkway/U. S. Highway 50 Interchange project, which was circulated for public review from June through September 1989. The Draft EIR was reviewed by the El Dorado County Planning Commission on September 21, 1989. The EIR also was reviewed before the El Dorado County Board of Supervisors on December 13, 1989.

As set forth in Section 15132 of the State CEQA Guidelines, the Final EIR consists of:

- (a) the Draft EIR,
- (b) comments and recommendations received on the Draft EIR either verbatim or in summary,
- (c) a list of persons, organizations, and public agencies commenting on the Draft EIR,
- (d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process, and
- (e) any other information added by the Lead Agency.

This document has been prepared in the form of an attachment or addendum to the Draft EIR and incorporates the Draft EIR by this reference. Copies of the Draft EIR are available for review at the El Dorado County Department of Transportation and the El Dorado County Community Development Department, Planning Division.

El Dorado County received both written and oral comments on the Draft EIR. Written comments are included verbatim in Appendix A. Oral comments have been summarized from the public hearing before the El Dorado County Planning Commission

and public hearing before the Board of Supervisors. A list of persons, organizations, and agencies commenting on the Draft EIR also is included in Appendix A.

The responses to significant environmental comments raised during the Draft EIR review process are arranged by chapter corresponding to the Draft EIR outline. Some comments have been paraphrased, and similar responses are occasionally cross-referenced to other responses to avoid duplication. Appendix A contains each comment numbered to correspond with the response.

## **CHAPTER 2. Responses to Comments**

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### **MISCELLANEOUS COMMENTS**

#### **MC-1 Comment: Sierra Planning Organization**

The Sierra Planning Organization (SPO), as the areawide clearinghouse for Nevada, Placer, El Dorado, and Sierra Counties, has received your Draft EIR entitled Silva Valley Parkway/U. S. Highway 50 Interchange.

SPO is concerned with the regional impacts of projects and their conformance to local planning needs and objectives. Based on these policies, it has been determined that this project will have no regional impact. In accordance with areawide review procedures, your report will be assigned Environmental Document Number ED89-03.

**Response:** Comment noted. No response necessary.

#### **MC-2 Comment: Sacramento Valley Chapter**

We are disappointed that the preparers of the Draft EIR chose to disregard our comments on the Notice of Preparation. That letter, reproduced on Draft EIR page B-7, is hereby incorporated by reference in these comments.

**Response:** The comment letter on the Notice of Preparation of the Draft EIR included the following points:

1. The distribution list should include the Environmental Protection Agency (EPA), Region IX, because of the substantial air pollution and air pollution planning issues raised and EPA's involvement in air pollution planning in the metropolitan Sacramento region.
2. The project is likely to have a substantial impact on air quality, regional traffic patterns, and land use. The cumulative impacts in these areas of development potentially served by this project should be evaluated in the Draft EIR. The basis for evaluation of impacts is the existing land uses in the area; to the extent that the interchange is a prerequisite to additional urban development, finding 8 of the checklist should be "yes" rather than "no." Mitigation measures that should be considered include transit system expansion, shuttle bus system, or other measures to reduce single-occupant vehicle trips.



3. The interchange poses major air pollution planning issues. The Draft EIR should examine the issue of consistency of the interchange and development to be served by the interchange with the existing Air Quality Plan for El Dorado County and current transportation plans.

**Response to Item 1.** Comment noted. EPA was not originally sent a copy of the Draft EIR because, from the Lead Agency's perspective, EPA has no jurisdiction over the project and has expressed no interest in it. After due consideration, however, EPA was forwarded a copy of the Draft EIR for review. EPA has responded that it will not review the Draft EIR pursuant to the National Environmental Policy Act (NEPA) since there is no federal action in the project as described. A copy of the EPA letter is included in Appendix A.

**Response to Item 2.** As stated in Chapter 1 of the Draft EIR (page 1), the approach to the EIR is to use the previous EIR for the El Dorado Hills Specific Plan (State Clearinghouse Number 86122912) as the prior EIR that discusses many of the broad environmental issues of developing the El Dorado Hills Specific Plan area. The cumulative impacts on air quality, regional traffic patterns, and land use are evaluated in that document.

The interchange is not considered a prerequisite to additional urban development. As stated in Chapter 1 of the Draft EIR (page 2), development of the El Dorado Hills area to the densities allowed by current zoning would require a new interchange or would result in significant and unavoidable traffic impacts at the El Dorado Hills/U.S. 50 interchange and the Bass Lake Road/U.S. 50 interchange. Urban development of the area could occur without the interchange.

El Dorado County is in the process of adopting and implementing a transportation system management (TSM) ordinance which would reduce single-occupant vehicle trips.

**Response to Item 3.** Neither specific land use development, the proposed interchange, nor other specific planned transportation projects are directly addressed in the adopted El Dorado County Air Quality Plan (El Dorado County 1982). In addition, there is no process in place to determine the consistency of land use development or transportation projects with the adopted Air Quality Plan (Thompson pers. comm.). As a result, it is not possible to include in the EIR a determination of the consistency of the proposed interchange and the Air Quality Plan.

El Dorado County is preparing an update of the Air Quality Plan. A work plan for the future air quality planning efforts has been submitted to the California Air Resources Board (Thompson pers. comm.).

**MC-3 Comment:** Jess Tong, Miriam Tong, Glory Tong, and Arthur Tong

We, the undersigned, wish to again request that the relocation of the site for the interchange at Highway 50 and Silva Valley Road be rejected.

To the new members of the now existing Planning Commission, we will present our reasons once again for keeping the interchange at the present location of the underpass:

1. The threat of loss of or damage to our water.
2. Added noise from traffic or onramp, east to the freeway.
3. Decreased ease of access to land north of the freeway.
4. Loss of trees on land south of freeway needed for onramp.
5. Disturbance of access to water for wild and domestic animals from spring-fed pond in Carson Creek.

The map as presented for the overpass site still has no solution for the access to the properties north of the freeway if they are no longer served by Tong Road.

In conclusion, we wish to state that the former Planning Commission has already once voted unanimously, on December 23, 1987, to move the interchange from the site of the overpass proposed in the first map, presented by El Dorado Hills Investors, a limited partnership. We have the minutes of that session that were taped in the Planning Commission office. It was very disturbing to be told by Scott Chadd at a meeting in the El Dorado County Department of Transportation office on the morning of the following regular meeting of the Planning Commission that I should be at the Planning Commission meeting, as the Planning Commission could vote to correct the minutes of that last meeting. Having made the appointment to, at the same time, discuss an alternate proposal for a more acceptable site with him, our attorney, and Mr. and Mrs. Art Byrum, and their attorney, none of the Tongs attended the Planning Commission meeting going on simultaneously.

Unexplainably, the Planning Commission did an about face, and corrected the minutes to read that they had not meant to physically move the site. Please consider this act, which Mrs. Tong later also taped from the proceedings of the Planning Commission on that day. I mean **THINK ABOUT IT!**

How can all five members have not known the meaning of a four letter word **MOVE?** Who changed their collective mind? Why is this discussion continuing?

We feel that the rejection of this first map has been already voted upon by the Planning Commission.

Response: Possible impacts to water on the Tong property are discussed in Chapter 7, "Hydrology and Water Quality," specifically see page 85 (spring on the Tong property), page 88 (access to the spring on the Tong property), page 89 (possible contamination of spring water), page 90 (possible alteration of the livestock value of the spring), page 92 (minimize activity in the spring area), and page 95 (provide an alternate water supply for livestock). See also Appendix C, Geohydrology Report on the Carson Creek Spring.

Added noise from traffic is discussed in Chapter 12, "Noise." Existing noise levels are described, as well as impacts of each alternative and mitigation measures for each alternative.

The third comment is basically that implementation of the Ridge Design would result in decreased ease of access to land north of the freeway. We disagree. Implementation of either design is contingent on development of the El Dorado Hills area. The design of the Ridge Design basically would allow two connections from the southern portion of the Tong property to the northern portion of the property. One connection would be the interchange design, the other connection would be the existing undercrossing. The Undercrossing Design, on the other hand, would have only one north-south crossing.

Loss of trees on land south of the freeway is an impact associated with either design. As described in Chapter 8, "Vegetation, Wildlife, and Aquatic Resources," implementation of either design would result in the elimination of blue oaks, interior live oak trees, and riparian shrubs. The Ridge Design would eliminate 59 blue oaks versus the 20 blue oaks eliminated by the Undercrossing Design. If tree removal were the only measure of impact, the Undercrossing Design would be the superior alternative; however, other resources, specifically wetlands, are considered more valuable than trees. Therefore, the Ridge Design is considered the superior alternative.

Disturbance of access to water for wild and domestic animals from the spring-fed pond in Carson Creek is discussed in Chapter 7, "Hydrology and Water Quality." This impact is common to both alternatives and is considered potentially significant (page 90). To reduce this impact to a less-than-significant level, provide an alternate water supply for livestock. The details of this mitigation measure are provided on page 95 of the Draft EIR.

**MC-4 Comment: Public Hearing (Planning Commission)**

We offer very strong objection to move the Draft EIR forward without concurrent analysis of land uses. We have been involved in the Specific Plan analysis since Day 1. The Planning Commission forwarded recommended land uses to the Board of Supervisors. The Board discussed land uses and adopted the Specific Plan, except for the area shown on page 53 of the Draft EIR. We are not talking legalities, we are talking fairness.

**Response:** Comment noted. The Planning Commission discussed land uses in detail during the Specific Plan process. The Board of Supervisors decided to retain the current land uses and zoning for the area affected by the location of the interchange pending determination of the interchange location. The location of the interchange cannot be determined until such time as the county and the California Department of Transportation (Caltrans) approve the project location. Until such time, it is the county's position that the land use designations for the area affected by the location of the interchange should remain "as is."

MC-5 Comment: Public Hearing (Planning Commission)

Out of the two alternatives, we concur that the Ridge Alternative has less environmental impact. As to both alternatives, the road realignment (Tong Road); we don't want to be tied to an alignment. The land use analysis should dictate the alignment.

Response: Comment noted. Several other individuals and agencies recommended the Ridge Design for similar reasons. The land use analysis should review any proposed road realignment.

MC-6 Comment: Public Hearing (Planning Commission)

I own a 5-acre piece of property in the black hole area. I have a house, barn, a couple of wells, and a hay shed. I think the Board of Supervisors wanted to select the interchange location and study the land uses at the same time. Our noise levels would be very high with either design. I want to know our zoning now.

Response: Comment noted. See also Miscellaneous Comment-4. Existing noise levels for property adjacent to the freeway are shown on page 199 of the Draft EIR. Structures on the north side of the freeway in the black hole area are currently exposed to peak hour Leq noise levels of 55.5 to 70.5 decibels (see page 194 of the Draft EIR). Implementation of either design would increase those noise levels. This impact is considered significant because, according to the El Dorado County General Plan Noise Element guidelines, noise levels in excess of 60 dBA would be incompatible with residential land uses shown for the vicinity of the project site. To reduce this impact to a less-than-significant level, reduce traffic noise by either implementing land use measures or constructing noise barriers.

The county's position is that the land use designations for the area affected by the location of the interchange should remain "as is" until such time as the precise location of the interchange is selected.

MC-7 Comment: Public Hearing (Board of Supervisors)

I would like to note that both designs eliminate the Dolder property. The Byrams do not oppose the Ridge Design; there is no significant difference in "take" between the two designs. We support the Ridge Design and support the staff recommendation. If the decision is made to select the Ridge Design, the county should proceed posthaste into resolving the land use issues.

Response: Comment noted. The El Dorado County Community Development Department has been working with the El Dorado County Department of Transportation in identifying the appropriate land uses for the "black hole" area.

MC-8 Comment: Public Hearing (Board of Supervisors)

As the representative of the Tong Family, I would like to again express my displeasure with the project and the Ridge Design. Not enough detail has been

provided about the access roads to the north and the access road to Clarksville. It is essential that Carson Creek be bridged to protect the creek. The bridge at Clarksville can just barely carry the floodwaters now. Also, this project will impact us so bad we will need to rezone our property.

**Response:** Comment noted. The county is working on providing more details on the local road needed to provide access to properties north of U.S. 50. The environmental document included preliminary design drawings, dated August 1988, which indicated a bridge crossing of Carson Creek north of U.S. 50 for the Ridge Design. Also, these same drawings indicate that a portion of the existing White Rock Road south of U.S. 50 would be removed but the bridge across Carson Creek would be retained.

Impacts to the Tong property are identified throughout the report. It is acknowledged that these impacts may be perceived as justification for a request to change land use designations.

## **CHAPTER 1. INTRODUCTION**

1-1 **Comment:** Office of Planning and Research

The State Clearinghouse has submitted the Draft EIR to selected state agencies for review. The review period is now closed and the comments from the responding agencies are enclosed. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to CEQA.

**Response:** Comment noted. No response necessary.

## **CHAPTER 2. PROJECT DESCRIPTION**

No comments were received on this chapter.

## **CHAPTER 3. SUMMARY OF FINDINGS**

No comments were received on this chapter.

## **CHAPTER 4. LAND USE**

No comments were received on this chapter.

## CHAPTER 5. AESTHETICS

No comments were received on this chapter.

## CHAPTER 6. GEOLOGY AND SOILS

No comments were received on this chapter.

## CHAPTER 7. HYDROLOGY AND WATER QUALITY

### 7-1 Comment: Public Hearing (Planning Commission)

On pages 94 and 95 of the Draft EIR it is recommended that we implement a water quality monitoring program. This program should be expanded to monitor chemicals also.

**Response:** Comment noted. The monitoring program was developed in part to be consistent with the monitoring program to be implemented as part of the El Dorado Hill Specific Plan project. No additional monitoring is recommended.

## CHAPTER 8. VEGETATION, WILDLIFE, AND AQUATIC RESOURCES

### 8-1 Comment: California Department of Fish and Game

The California Department of Fish and Game (DFG) has the following comments and recommendations:

1. The Ridge Design would result in less direct loss of important habitat types (freshwater marsh, purple needlegrass grassland) and, thus, require less extensive mitigation measures. This design should be selected as the preferred alternative.
2. Mitigation measures, as outlined on pages 110-113 of the Draft EIR, should be fully implemented.
3. In order to comply with Public Resources Code Section 21081.6, a monitoring program must be developed not only for wetlands but for

all imposed mitigation conditions. The monitoring program should include the following:

- a. Specific criteria should be established that would be used to measure the effectiveness of mitigation success.
- b. Annual monitoring should be in effect for a minimum of 5 years. Annual written reports should be prepared and submitted to El Dorado County and the DFG.
- c. Each annual monitoring report should include corrective recommendations that shall be implemented in order to assure that mitigation efforts will be successful.

**Response:** Comments noted. The Ridge Design is identified in the Draft EIR as the environmentally superior alternative.

8-2 **Comment:** U.S. Fish and Wildlife Service

Under the Fish and Wildlife Coordination Act, the U.S. Fish and Wildlife Service (Service) advises the U. S. Army Corps of Engineers (Corps) on projects involving dredge and fill activities in waters and wetlands of the United States. We encourage all efforts to protect, improve, and restore fish, wildlife, and naturally functioning aquatic and wetland ecosystems of our nation. It is also our responsibility to provide recommendations to protect and restore populations of threatened and endangered species.

Because of our interest in the biological integrity of riparian and marsh habitats, we generally recommend against project development which would impact these valuable and increasingly scarce habitats. Only when the applicant has considered all the practicable alternatives to the project, and has demonstrated that the selected alternative is the least environmentally damaging, should mitigation for unavoidable fish and wildlife losses become an issue. If wetlands are adversely affected, full mitigation that leads to no net loss of wetland acres and value is recommended. Our mitigation goal for unavoidable impacts to uplands is to minimize habitat value losses. We maintain that the best way to mitigate for adverse biological impacts is to avoid them whenever possible.

**Response:** Comment noted. As discussed in Chapter 2 of the Draft EIR (pages 19, 25-28), various alternatives to the project were considered and rejected because of their infeasibility or inability to meet the project objectives. From the applicant's perspective, all practicable alternatives to the project have been considered.

8-3 **Comment:** U.S. Fish and Wildlife Service

Based upon information presented in the Draft Report and our knowledge of the area, wetland habitat will be directly impacted by the proposed project. The project may, therefore, require a Corps permit, thus triggering Service involvement pursuant

to the Coordination Act. The project proponent should contact the Corps to ascertain if a permit is required for the proposed project.

**Response:** Comment noted. On page 13 of the Draft EIR it is noted that acquisition of a Section 404 permit from the Corps may be necessary for placing box culverts in Carson Creek or other drainages, placing fill, or dredging the waterways.

8-4 **Comment:** U.S. Fish and Wildlife Service

If impacts to wetland habitat cannot be avoided, the Service concurs with the statement of page 32 of the Draft Report: "The (mitigation monitoring) program should, at a minimum, identify the following: what department is responsible for monitoring the mitigation, what is being monitored and how, what schedule is required to provide adequate monitoring, and what identifies the monitoring as complete." This program should be fully described in the Final Report.

**Response:** Comment noted. If the project is approved, El Dorado County will be required to prepare a mitigation monitoring program; however, the program will not be a part of the Final EIR.

8-5 **Comment:** U.S. Fish and Wildlife Service

The Service concurs that the least environmentally damaging alternative of the two proposed to date is the Ridge Design. As stated on page 36 of the Draft Report, 1.6 acres of freshwater marsh and 0.15 acre of purple needlegrass habitat would be eliminated by the Ridge Design, compared to 7.5 acres of freshwater marsh and 2.7 acres of purple needlegrass habitat eliminated by the Undercrossing Design. We recommend development of a third design which would avoid impacts to wetlands. If such an alternative is not feasible, the reasons why should be thoroughly documented in the Final document.

**Response:** Comment noted. As discussed in Chapter 2 of the Draft EIR (pages 19, 25-28), various alternatives to the project were considered and rejected because of their infeasibility or inability to meet the project objectives. From the applicant's perspective, all practicable alternatives to the project have been considered.

The decision as to which mitigation measures will be adopted or made a condition of project approval will be made by the Board of Supervisors and Caltrans.

8-6 **Comment:** U.S. Fish and Wildlife Service

The Service strongly recommends that the mitigation measures identified in the Draft Report to compensate for impacts to wetlands be implemented if wetland impacts are shown to be unavoidable.

On page 112, one measure identified for the loss of freshwater marshes and seeps is to, "Establish a wetland of equal acreage and value or enhance an existing degraded wetland." A site with suitable wetland hydrology and topography to create a new freshwater marsh is not identified nor is the procedure for establishing a



wetland outlined. These issues should be addressed in the Final Report, along with a detailed revegetation plan and monitoring scheme. Simply enhancing an existing degraded wetland will not help attain our goal of no net loss of wetland acres. New wetlands would have to be established in an area that is now upland.

**Response:** Comment noted. The issues involved in identifying an area to create a new freshwater marsh and establish a wetland will be addressed in the mitigation monitoring report, which will be a separate document from the Final EIR.

The other comment states that the Service does not consider the enhancement of an existing degraded wetland as part of the adequate mitigation recommended for the elimination of wetlands including freshwater marsh habitat dominated by dense sedge. Comment noted. If the project requires a Section 404 Corps permit, thus triggering Service involvement pursuant to the Coordination Act, any mitigation plan would need to be coordinated with the Service.

**8-7 Comment: U.S. Fish and Wildlife Service**

On page 113, another mitigation measure identified is to, "Replant an area with Purple Needlegrass." Purple needlegrass is a poor competitor with non-native grassland species and requires a specific soil profile to grow. We recommend a detailed revegetation plan and monitoring scheme which addresses all factors affecting the survival of purple needlegrass be included in the Final Report if this species is used.

**Response:** Comment noted. Implementation of either design would result in the elimination of purple needlegrass grassland and the elimination of habitat for wildlife species associated with the purple needlegrass grassland. This impact is considered significant because it represents a remnant vestige of a once common habitat; the occurrence at the project area is the only one known for El Dorado County, and it is locally and regionally scarce. The recommended mitigation measure is to protect the purple needlegrass from construction impacts, and replant an area with purple needlegrass. The issues involved in replanting an area with purple needlegrass will be addressed in the mitigation monitoring report, which will be a separate document from the Final EIR.

**8-8 Comment: Public Hearing (Planning Commission)**

I think that the loss of blue oaks should be considered a significant and unavoidable impact. How long does it take to get a blue oak to grow to a 12-inch diameter at breast height?

**Response:** Comment noted. Depending on growing conditions, it requires approximately 10-20 years for a blue oak in the foothills to reach a 12-inch diameter. Of course some blue oaks may not reach that size in 50 years. Oaks and other trees are considered an important natural feature of El Dorado County.

## CHAPTER 9. PUBLIC SERVICES AND FACILITIES

No comments were received on this chapter.

## CHAPTER 10. TRANSPORTATION

### 10-1 Comment: California Department of Transportation

A summary of transportation impacts beginning on page 37 includes an improvement from LOS E (no-project) to LOS D during the p.m. peak hour at the Latrobe Road eastbound ramp intersection. Because this is considered a beneficial impact, it is not appropriate to list the reconstruction of the El Dorado Hills Boulevard interchange as mitigation within the scope of the Silva Valley project. This is also true of the reconstruction of the Bass Lake Road interchange, listed as a mitigation measure on this same page.

The document has adequately addressed the impacts associated with the construction of the Silva Valley Parkway interchange. We have no further comments other than those above.

**Response:** Comment noted. Even with construction of the Silva Valley Parkway interchange, reconstruction of the El Dorado Hills Boulevard interchange and improvement of the Latrobe Road/U.S. 50 eastbound ramps intersection would be required to improve the traffic situation to a less-than-significant level. The argument can be made that these mitigation measures are not required because the traffic situation improves; however, from the county's perspective these measures would still be required for long-range planning.

## CHAPTER 11. AIR QUALITY

### 11-1 Comment: Sacramento Valley Group

The **Draft EIR** is flawed in that it fails to quantitatively consider the impacts of the facility on ozone air pollution. The federal EPA has stated, concerning other freeway expansion projects, that a

"project must demonstrate that it does not conflict with the national Clean Air Act. To do this requires a thorough air quality analysis of the project and its associated impacts . . ."

Ozone is a major environmental problem in the Sacramento region. Traffic resulting from construction of the interchange will increase emissions of ozone precursors. This is a significant environmental impact of the project.

**Response:** Comment noted. As stated in Chapter 1 of the Draft EIR (page 1), the approach to the EIR is to use the previous EIR for the El Dorado Hills Specific Plan (State Clearinghouse Number 86122912) as the prior EIR that discusses many of the broad environmental issues of developing the El Dorado Hills Specific Plan area. And, as stated in Chapter 11 of the Draft EIR (page 180), a substantial portion of traffic using the interchange would be oriented toward land use development in the El Dorado Hills Specific Plan area. The regional air quality impacts of this land use development have been discussed and quantitatively analyzed in the El Dorado Hills Specific Plan EIR.

Also, as stated in Chapter 11 of the Draft EIR (page 185), implementation of either design would result in no direct increase in ozone precursors. Development of the area and the resultant traffic would create ozone precursors; construction of the interchange would not create traffic.

**11-2 Comment: Sacramento Valley Group**

Because of the ozone impacts of the project, the Draft EIR also needs to consider alternatives to the project that would lead to fewer ozone precursors.

**Response:** Comment noted. See response to comment 11-1.

**11-3 Comment: Sacramento Valley Group**

The Draft EIR also needs to consider mitigation measures that would reduce the ozone impact of the project. Such mitigation measures could including funding of transit and provision for mixed land uses, bicycle, and pedestrian trails. The Draft EIR should describe the extent to which land use plans in the area to be served by this project incorporate such trip reduction measures.

**Response:** Comment noted. As stated in Chapter 1 of the Draft EIR (page 1), the approach to the EIR is to use the previous EIR for the El Dorado Hills Specific Plan (State Clearinghouse Number 86122912) as the prior EIR that discusses many of the broad environmental issues of developing the El Dorado Hills Specific Plan area. Regional ozone impacts are discussed in that document. The El Dorado Hills Specific Plan land use plan incorporates bicycle and pedestrian trails. Also, El Dorado County has been planning on a mix of land uses in the El Dorado Hills area with primarily commercial and industrial land uses south of U.S. 50 and residential land uses north of U.S. 50.

**11-4 Comment: Sacramento Valley Group**

The Draft EIR is completely silent on the issue of conformity of this project with the current approved Air Quality Plan for El Dorado County. A determination of conformity is a prerequisite to inclusion of this or any project in a transportation plan approved by a metropolitan planning organization designated pursuant to federal law, to approval of the project by the Federal Highway Administration, and to issuance of a 404 permit by the Corps of Engineers.

The current Air Quality Plan for El Dorado County is a "rural nonattainment plan" which reflects the assumption that there will be no significant urban development within El Dorado County. Please describe any activities currently underway to update this plan and/or comply with the provisions of the California Clean Air Act.

If a conformity determination has been already made, the Draft EIR should provide the conformity determination upon which such approval is based. If a conformity determination has not been made, it is important that the proposed basis for such a determination be provided for public review in the Draft EIR.

**Response:** Please see the response to Comment MC-2, Item 3.

11-5 **Comment:** Sacramento Valley Group

The Draft EIR notes that no air quality monitoring stations exist for El Dorado Hills. Air quality monitoring should have been carried out for this Draft EIR, in order to provide an information base that is empirical rather than speculative. Plans for the development of air quality monitoring should be developed and implemented as a part of this project, in order to comply with new provisions of state law related to mitigation monitoring, as well as to provide a better database for environmental review of future projects.

**Response:** As noted on page 175 of the Draft EIR, no monitoring stations existed in the El Dorado Hills area at the time the EIR was published (June 1989). During July 1989 an ozone and carbon monoxide monitoring station began operating in the El Dorado Hills area. The monitoring station is located at Ponderosa High School in Shingle Springs (Thompson pers. comm.).

The Shingle Springs monitoring station has recorded a violation of the ozone air quality standard, validating the area's ozone nonattainment designation (described on page 173 of the Draft EIR). The monitoring station has not recorded a violation of the carbon monoxide air quality standard (Thompson pers. comm.). It is possible that the lack of a recorded carbon monoxide standard violation is due to the monitor not having operated during a typical high carbon monoxide season (typically the winter months).

These new monitoring data and any future monitoring data would not affect the conclusions of the air quality analysis in the EIR.

## CHAPTER 12. NOISE

No comments were received on this chapter.

## CHAPTER 13. CULTURAL RESOURCES

### 13-1 Comment: Sacramento Valley Group

Chapter 13 of the Draft EIR, "Cultural Resources," is inadequate. It is our belief that the historic integrity of the early settlement of Clarksville would be destroyed by this project without being described adequately or mitigated in any way. Specifically:

- The "Ethnography" section is composed entirely of secondary sources. There seems to be no formal relationship between the information in it, and the specific project location in Clarksville.
- In the "Descriptive" section, the Draft EIR contains no legible map on a scale small enough to discern the relationship between the various cultural entities. Without such a map, there is no way for an independent analysis to evaluate the possible relationship between the various "sites."
- Finally, the conclusions presented, that the sites lack integrity, that the prehistoric components have been "totally recorded and have no further research value," that the historic parts of site 585/H are not important enough to be considered are not proved by the arguments or by the evidence.

**Response:** Comment noted. There are no ethnographically known sites in the project vicinity. There is no reason to believe that a primary source of research is warranted due to the lack of known ethnographically recognized sites.

The location of cultural resource sites cannot be released to the general public because of vandalism problems. Complete scaled sketch maps, as well as site location maps of the cultural resources, have been filed with the North Central Information Center at California State University, Sacramento.

Site 558-H lacks integrity. The original structure burned down many years ago and the site has been extensively vandalized. The original configuration cannot be determined from the remaining portions of the site. It is the opinion of the archeologist that the site lacks integrity and has no research value. The site is not significant.

The only prehistoric resources in the project area are bedrock mortars. After recordation, bedrock mortars have no further research value and are not considered a significant resource in California.

The historic parts of site 585/H are considered possibly important resources. As described on page 223 of the Draft EIR, implementation of either design would result in disturbance to portions of CA-Eld-585/H including the adits, and possibly the stamp mill, cabin, and terraces, which lie near the edge of the proposed right-of-way. This impact is considered potentially significant. To reduce this impact to a less-than-significant level, preserve CA-Eld-585/H or require additional work.

**CHAPTER 14. ALTERNATIVES TO THE  
PROPOSED PROJECT**

No comments were received on this chapter.

**CHAPTER 15. CUMULATIVE IMPACTS**

No comments were received on this chapter.

**CHAPTER 16. BIBLIOGRAPHY**

No comments were received on this chapter.

**CHAPTER 17. REPORT PREPARATION**

No comments were received on this chapter.



## **CHAPTER 3. Bibliography**

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### **LITERATURE CITED**

El Dorado County. 1982. Nonattainment plan for the Mountain Counties portion of El Dorado County. Placerville, CA.

### **PERSONAL COMMUNICATIONS**

Thompson, J. Air Pollution Control Specialist. El Dorado County Air Pollution Control District, Placerville, CA. November 30, 1989 - telephone conversation.