

**RESPONSES TO COMMENTS FOR THE
Initial Study/Mitigated Negative Declaration for the
Oak Hill Road at Squaw Hollow Creek Bridge (No. 25C0096)
Replacement Project (CIP #77134)**

CEQA REQUIREMENTS

The CEQA Guidelines §15073.5(a) requires that a lead agency re-circulate a negative declaration “when the document must be substantially revised.” A “substantial revision” includes: (1) identification of a new, avoidable significant effect requiring mitigation measures or project revisions and/or (2) determination that proposed mitigation measures or project revisions will not reduce potential effects to less than significant and new measures or revisions must be required. Recirculation is not required when new information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

Although not required under CEQA, the County is also providing responses to certain comments made on the IS/MND during the public review period. No new information, no new impacts and no new mitigation was necessary as a result of these comments. Copies of the comment letters and responses are presented below.

Responses to Comments

The following letters were received during the public review period:

- Letter 1: Central Valley Regional Water Quality Control Board, February 7, 2017
- Letter 2: Lester Lubetkin, February 7, 2017
- Letter 3: Rick Ferriera, February 14, 2017

Letter 1: Central Valley Regional Water Quality Control Board

General regulatory guidance letter. No response necessary.

Letter 2: Lester Lubetkin

Responses to comments are numbered below and on the letter.

2-1 Twitchell Road (which is not a County-maintained road) is located approximately 1,050 feet north from the proposed bridge project. Improving the Twitchell Road intersection is beyond the scope of the County’s work and is outside of the project limit. There is an approximately 650-foot gap (narrow unimproved section) between the proposed improvement and Twitchell Road intersection. The County does not consider traffic speed at the Twitchell Road intersection to be a concern related to the proposed project since the proposed project improvements would end approximately 650 feet south of the intersection. In addition, Caltrans’ Local Highway Bridge Program funding is limited to 400 feet of roadway improvements on either side of the project bridge. Any improvements to the Twitchell Road intersection would not be covered by the current project funding.

2-2 The new bridge and roadway approaches will conform to current American Association of State Highway and Transportation Officials (AASHTO) design standards. Narrowing of the roadway approaches to the bridge as a means of

traffic speed control would be counter to the purpose of the proposed project, which is to improve public safety. The proposed project is centered on the Squaw Hollow Creek bridge. As previously described in 2-1, the Twitchell Road intersection is located outside of the proposed project limits. The project Feasibility Study (County of El Dorado Community Development Agency, Transportation Division 2015) concluded that the proposed project would provide greater motorist safety than rehabilitation of the existing bridge or no action.

Letter 3: Rick Ferriera

- 3-1 Comment noted. The public draft CEQA IS/MND was available during the public scoping period as specified in the Notice of Intent (January 16 through February 14, 2017). It was, and continues to be, available through the El Dorado County Department of Transportation website and via the website link (<http://www.edcgov.us/Government/DOT/CEQA.aspx>) provided in the Notice of Intent. During the public scoping period, the IS/MND was also available for review at the County's Transportation office in Placerville. No other comments were received concerning the document's unavailability via the website link. The County conducted public scoping for the proposed project in accordance with CEQA Guidelines (Sections 15072 and 15073).
- 3-2 In 2008, the Squaw Hollow Creek bridge on Oak Hill Road was determined by Caltrans to be functionally obsolete (i.e., built to standards that are not used today, such as inadequate lane and shoulder widths). Subsequent structure inventory and appraisal reports (2011, 2012, and 2014) have resulted in similar conclusions, classifying the bridge as functionally obsolete. The existing bridge was constructed in 1945 with an anticipated 75-year life expectancy—the accepted engineering standard for these types of bridges. Because the existing bridge is also showing signs of structural deficiency, including significant concrete cracking and undermining of one abutment, the County proposes replacement while there is a viable federal funding source available. The existing bridge's structural and functional deficiencies not only present a risk to motorists, but also to emergency response vehicles. The County assessed a rehabilitation alternative in its project Feasibility Study, which was reviewed and approved by Caltrans. This study concluded that bridge rehabilitation would delay the ultimate need for bridge replacement by approximately 25 years, but would be the most costly option and the safety concerns associated with the existing alignment (e.g., the southern approach curve) would remain inconsistent with current AASHTO traffic safety standards.
- 3-3 The County considered aesthetics and potential effects of the proposed project on visual resources in its project design. Views of the proposed project area from nearby residences would continue to be buffered by trees and other vegetation. Although construction of the project would involve tree removal and construction of a retaining wall, these activities would be conducted in a linear fashion parallel to the existing road corridor, thus allowing for an aesthetic consistent with the existing road corridor. Regardless of the alternative selected—replacement versus rehabilitation—the bridges would ultimately have similar total clear deck widths of 30 feet between the bridge barricades/rails. The proposed replacement bridge would be approximately 8 feet longer than the existing structure (proposed bridge would be 32 feet long; existing bridge is 24 feet long) to allow for it to be placed outside of the active Squaw Hollow Creek

flow channel. The proposed increase in bridge elevation by 5 feet is an approximation of the height that will be needed to meet minimum AASHTO standards related to sight distance. The effect of the proposed project on visual resources within the road corridor would be consistent with the existing segments of road corridor at both ends of the project area.

3-4 The Project could result in the removal of up to approximately 60 trees, including approximately 48 non-oak species and 12 oak species. This would be a less-than-significant impact because the trees slated for removal are common to the area and their removal will not result in a significant reduction of trees in the general project area. While the proposed new bridge will be located to the west of the existing bridge, removal of trees on the east side of the old bridge is necessary to accommodate fill needed to create the new road corridor and remove the existing severe curve at the approach to the existing bridge.

Furthermore, per section 130.039.050 D of the County's proposed Oak Resources Conservation Ordinance (anticipated to be instated prior to project construction), County road projects, including widening and realignment projects that are necessary to protect public health, are exempted from the Ordinance.

The July 10, 2012 Peremptory Writ of Mandate by the Superior Court of California states as follows:

2) to retain in place, for an interim period until the County develops an offsite mitigation strategy in compliance with the Settlement Agreement in El Dorado County Taxpayers for Quality Growth v. County (Case number 96CS01290) and CEQA, a limited public safety exemption from the requirements of General Plan Policy 7.4.4.4 for road projects as set forth below:

Public Road Safety Projects Exempt from Policy 7.4.4.4. Oak canopy removal necessary to complete the County capital improvement projects are exempt from the canopy retention and replacement standards, when the new alignment is dependent on the existing alignment. This exemption applies to road realignment or widening which are necessary for public safety reasons within the existing or any acquired right of way. The county will minimize impacts to oak woodlands and utilize the minimum area of the acquired right of way necessary to achieve the public safety purpose. This exemption shall also apply to removal of oak canopy necessary to comply with safety regulations of the Public Utilities Commission and necessary to maintain the safe operation of utility facilities.

The Federal Highway Bridge Program is a safety program, and therefore qualifies for this exemption, which remains in place until the County's offsite mitigation strategy is in place. Unlike development projects, road safety projects utilize every square foot of a project area to minimize impacts on right of way and the environment, often making it impossible to mitigate onsite.

For the proposed project, the County will retain as many trees in the project area as is practicable. The project Feasibility Study determined that rehabilitation would require the removal of fewer trees (approximately 15 trees), but following the anticipated 25-year service life associated with a rehabilitated bridge structure, approximately 42 additional trees would need to be removed to accommodate a new structure.

- 3-5 Squaw Hollow Creek is mapped by the U.S. Geological Survey as a perennial stream. Pools greater than 1 foot deep were not observed during the field assessment conducted by North State Resources, Inc. in June and August 2015. This observation may be attributable to ongoing drought conditions. The completed proposed project would have no effect on the hydrology of Squaw Hollow Creek.

Moreover, the field assessment searched for pools greater than 1 foot deep in the summer months because pools greater than 1 foot deep in the summer months suggest that the area might be suitable for California red-legged frog breeding and larval rearing. Even if pools greater than 1 foot deep in the summer months have occurred in the past, red-legged frogs were not observed and are not likely to occur in the project area because the nearest known breeding population is more than 10 miles east of the project area and Squaw Hollow Creek lacks the dense emergent and submergent vegetation required for California red-legged frog larval development.

- 3-6 (a, b) See 3-2. The proposed Squaw Hollow Creek bridge replacement project will involve the use of protections in the stream channel to minimize the project's potential to impact the stream and adjacent riparian wetlands, affect water quality, and to maintain flow during construction. The County will utilize the minimum design requirement/standards per AASHTO. In addition, mitigation was included in the CEQA IS/MND (*Mitigation Measure 4: Comply with permit conditions and compensate for the loss of riparian wetlands in the project area*) to ensure impacts on Squaw Hollow Creek and adjacent riparian wetlands will be minimized to the greatest extent feasible.

- 3-7 The project Feasibility Study determined that rehabilitation of the existing bridge would require the removal of fewer trees (approximately 15 trees), but following the anticipated 25-year service life associated with a rehabilitated bridge structure, approximately 42 additional trees would need to be removed to accommodate a new structure. In addition, the Feasibility Study concluded that rehabilitation of the existing bridge structure would be the costlier option and would not alleviate the poor geometrics of the existing roadway alignment and limited sight distance.

- 3-8 The project Feasibility Study determined the proposed increase in bridge elevation by 5 feet is an approximation of the height that will be needed to meet minimum AASHTO standards related to sight distance. In order to minimize impacts on the active creek channel, the new bridge structure would be longer than the existing bridge structure and slightly elevated. This slight increase in elevation associated with the proposed project would serve to not only avoid the active creek channel, but would also ensure that the new bridge structure would not impede significant flood events, such as a 50- or 100-year flood.

- 3-9 The project Feasibility Study determined that the proposed changes to Oak Hill Road in the project area, including changes to the road's geometry, would result in increased traffic safety. The road's horizontal curves would be adjusted to meet AASHTO sight distance standards and would provide wider travel lanes. Rehabilitation of the existing bridge, instead of replacement, would fail to meet AASHTO standards for modern roads and bridges, primarily because the horizontal curve at the southern bridge approach would be retained. Despite the road approaches being widened under a rehabilitation alternative, they would not match the existing road cross slope and would likely not be compatible with AASHTO standards.
- 3-10 According to the El Dorado County Department of Transportation records (obtained from California Highway Patrol Accident Reports), between 2007 and 2016, there have been two reported accidents within 500 feet of each side of the Squaw Hollow Bridge on Oak Hill Road. One accident involved a single vehicle hitting an object, while the other was a two-car sideswipe incident. The design speed of the proposed new roadway would remain consistent with the existing unposted 30 mile per hour road speed. Proposed changes in the project alignment, vegetation management, and widening of the road corridor would improve the safety of motorists traveling on Oak Hill Road. Under the proposed project, overall sight distance and visibility would be improved. The proposed project was designed in accordance with AASHTO traffic safety guidelines.
- 3-11 Similar to the response provided for 3-11, the County has considered the safety of residential driveway ingress and egress in its project design. In addition to the increased sight distance that would be created by the removal of the severe southern bridge approach curve, the project Feasibility Study identified the need for local driveways to conform to the proposed Oak Hill Road roadway profile.