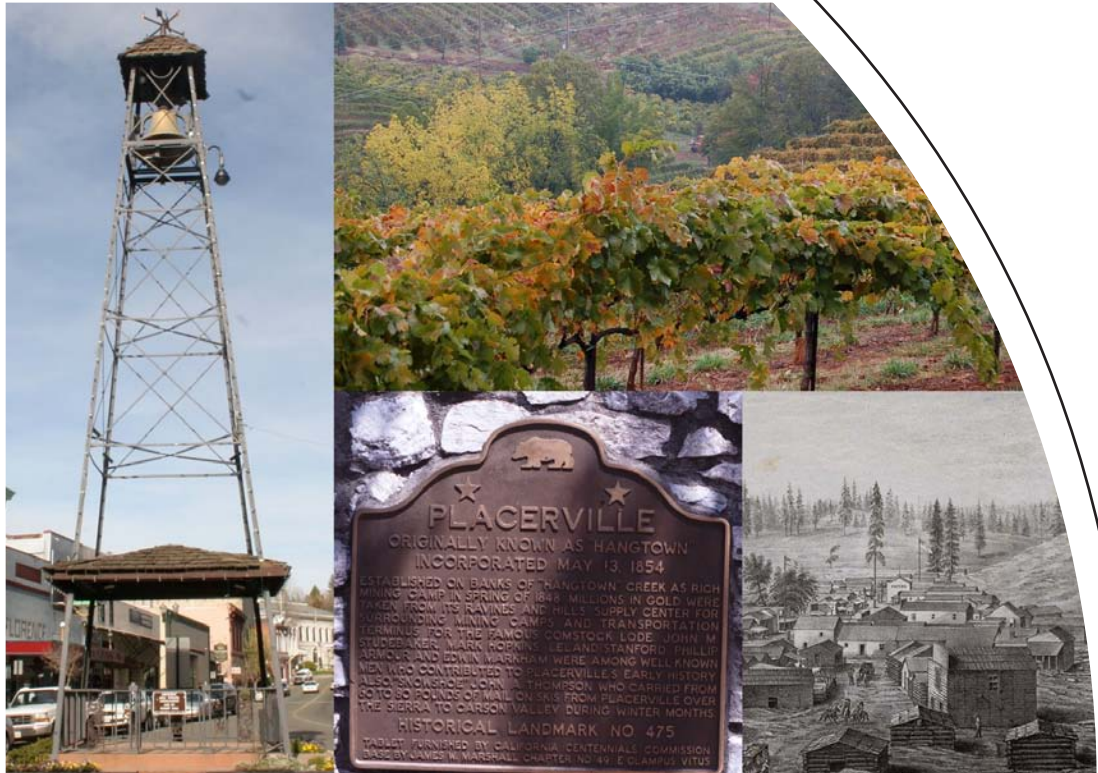


PLACERVILLE REDEVELOPMENT PLAN



FINAL ENVIRONMENTAL IMPACT REPORT

State Clearinghouse No. 2010102025



REDEVELOPMENT AGENCY OF
THE CITY OF PLACERVILLE

11-0853.6.

MARCH 2011

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REDEVELOPMENT AGENCY OF THE CITY OF PLACERVILLE
City Hall, Second Floor
3101 Center Street
Placerville, CA 95667
Contact: Cleve Morris, City Manager
cmorris@cityofplacerville.org
(530) 642-5200

Prepared By:
THE ERVIN CONSULTING GROUP
8561 Almond Bluff Court
Orangevale, CA 95662-4419
info@ervincg.com
(916) 989-0269



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1. INTRODUCTION

PURPOSE OF THIS DOCUMENT

This document contains public comments received on the Draft Environmental Impact Report (Draft EIR) for the Placerville Redevelopment Plan (proposed project or Redevelopment Plan). This document has been prepared in accordance with the California Environmental Quality Act (CEQA). Written comments were received by the Redevelopment Agency of the City of Placerville (Agency) during the 45-day public comment period held from December 27, 2010 through February 9, 2011. This document includes written responses to each comment received on the Draft EIR, and together with the Draft EIR constitutes the Final EIR. The responses correct, clarify, and/or amplify text in the Draft EIR as appropriate. These changes do not alter the conclusions of the Draft EIR.

SUMMARY OF THE PROJECT DESCRIPTION

As described in the Draft EIR, the proposed project would authorize the use of redevelopment tools to remove blight within the Project Area over a 30-year period, following adoption of the Redevelopment Plan in mid-2011.

The proposed Project Area includes most of the City's commercial areas, including the Placerville Drive, Downtown, and Broadway areas. Additionally the Project Area contains properties on the west and east perimeters of the existing City limits in the unincorporated County, including the areas known as Smith Flat and Motor City. Adoption of the Redevelopment Plan with respect to these unincorporated areas would also be subject to approval by the El Dorado County Board of Supervisors.

The Redevelopment Plan is a programmatic document, which empowers the Placerville Redevelopment Agency (Agency) to implement a variety of tools to revitalize the Project Area consistent with the California Community Redevelopment Law (CRL; Health and Safety Code Section 33000 et seq). The Redevelopment Plan provides that land use policies shall be those established by the City's General Plan as such policies exist today, or may be hereafter amended. Consistent with the City's General Plan, implementation actions may include:

- Improvements to public infrastructure and facilities serving the Project Area
- Repairs, rehabilitation, and reconstruction of Project Area properties
- Removing impediments to economic development
- Increasing, improving, and preserving the community's supply of affordable housing

The Redevelopment Plan would authorize the Agency to collect tax increment revenue, generated from increases in the assessed value of the Project Area, to finance the cost of these activities. Specific actions would be implemented gradually over the duration of the Redevelopment Plan, in accordance with the annual budget and five year implementation plan of the Agency. Such specific actions may require additional environmental analysis at a future date. The Redevelopment Plan would also authorize the Agency to use eminent domain on property that is not occupied as a residence. With respect to the property in the County unincorporated areas, until such time as the property is annexed to the City, land uses would be those established in the County's General Plan and the Agency would have no authority to use eminent domain to acquire property.

PROJECT OBJECTIVES

The purposes and objectives of the Redevelopment Plan are to eliminate the conditions of blight existing in the Project Area, as defined by CRL, and to prevent the recurrence of blighting conditions within the Project Area. The Agency proposes to eliminate such conditions and prevent their recurrence by providing, pursuant to the Redevelopment Plan, for the planning, development, re-planning, redesign, redevelopment, reconstruction, and rehabilitation of the Project Area and by providing for such facilities as may be appropriate or necessary in the interest of the general welfare, in accordance with the City's General Plan and other planning documents, as they may be adopted or amended from time to time. The Proposed Project will achieve the purposes of the CRL by:

- The elimination of blighting influences, the correction of environmental deficiencies, and the conservation, rehabilitation, and redevelopment of the Project Area
- The enhancement and renovation of businesses within the Project Area to promote their economic viability, and the overall strengthening of the economic base of the Project Area and community
- The cooperation of and participation by property owners, business owners, public agencies, and community organizations in the redevelopment and revitalization of the Project Area
- The provision of needed improvements to the community's recreational, cultural, and other community facilities to better serve the Project Area
- The provision of needed improvements to streets, curbs, gutters, water and sewer utilities and other public utilities and facilities within the Project Area
- The attainment of an environment reflecting a high level of concern for architectural, landscape, and urban design principles
- The conservation and preservation of buildings and structures of architectural or other historic significance to the community
- The provision of affordable housing that serves the needs and desires of the various age and income groups of the community
- The provision of adequate land for parking and open spaces

The foregoing redevelopment goals and objectives are to be pursued and accomplished, subject to and consistent with the City's General Plan, as it may be amended from time to time.

REQUIRED PROJECT APPROVALS/ENTITLEMENTS

The EIR will serve as the CEQA compliance document for adoption of the Redevelopment Plan, and for subsequent actions by the Agency in furtherance of the Redevelopment Plan.

The Board of the Redevelopment Agency of the City of Placerville, as Lead Agency, will take the following actions:

- Certify the EIR and adopt Findings and a Mitigation Monitoring Plan (MMP)

The City of Placerville, as Responsible Agency, will take the following actions for project approval:

- Adopt the Placerville Redevelopment Plan

The County of El Dorado, as Responsible Agency, will take the following actions:

- Approve the Placerville Redevelopment Plan

The EIR will be used by the following public agencies and boards in the approval of implementation activities under the Redevelopment Plan:

- Board of the Redevelopment Agency of the City of Placerville
- Placerville City Council
- El Dorado County Board of Supervisors
- Placerville Planning Commission
- All Departments of the City and County who must approve implementation activities undertaken in accordance with the Redevelopment Plan
- All other public agencies that may approve implementation activities undertaken in accordance with the Redevelopment Plan

The EIR will be used in the adoption of and approval of any of the following redevelopment project implementation activities that may be necessary:

- Approval of Disposition and Development Agreements (DDA)
- Approval of Owner Participation Agreements (OPA)
- Approval and funding of public facilities and improvements projects
- Sale of tax increment and/or other bonds, certificates of participation and other forms of indebtedness
- Acquisition and demolition of property
- Rehabilitation of property
- Relocation of displaced occupants
- Approval of certificates of conformance
- Approval of development plans, including zoning and other variances and conditional use permits; including those for low- and moderate-income housing units
- Issuance of permits and other approvals necessary for implementation of the Redevelopment Plan

TYPE OF DOCUMENT

This EIR has been prepared by the Redevelopment Agency of the City of Placerville, as the Lead Agency under the CEQA.

This document is the response to comments portion of the Final Program EIR, which has been prepared to evaluate the potentially significant effects of public improvements and development that may be encouraged by the Redevelopment Plan. Adoption and implementation of the Redevelopment Plan would provide tools and funding to facilitate public infrastructure improvements and the rehabilitation, reconstruction, and new construction of buildings and housing in the Project Area that would result in physical changes to the environment, and is thus considered a "project" as defined by Section 15378 of the CEQA Guidelines. As such, completion of an environmental impact report is required to determine the Amendment's potential for resulting in significant environmental impacts. Use of a Program EIR allows the Lead Agency to evaluate the impacts of the Redevelopment Plan's implementation at a comprehensive level of detail, focusing on area-wide and cumulative impacts and programmatic mitigation measures.

The Final Program EIR serves as the environmental baseline for subsequent project level approvals for Redevelopment-engendered projects within the Project Area. As individual activities pursuant to the Redevelopment Plan are proposed, the City, as a permitting agency, must examine the individual activities to determine whether their effects have been fully evaluated in the Program EIR, and if not, what additional steps should be taken. Additional environmental review for private development engendered by the Redevelopment Plan would be required if any of the conditions outlined in CEQA Guidelines Sections 15162 or 15163 were to occur. This includes identification of significant impacts from detailed site and design information that were not identified in this programmatic level EIR. Additional steps may include preparation of a project-level Negative Declaration or EIR.

This EIR is an informational document intended to disclose to the Agency and the public the environmental consequences of adopting and implementing the proposed project. The preparation of the Final EIR focuses on the responses to comments on the Draft EIR. The Lead Agency (Redevelopment Agency of the City of Placerville) must certify that the EIR adequately discloses the environmental effects of the project and has been completed in conformance with CEQA, and that the decision-making bodies independently reviewed and considered the information contained in the EIR prior to taking action on the project. The City will consider this Program EIR in subsequent approvals of redevelopment-engendered projects.

CEQA Guidelines Section 15132 specifies that the Final EIR shall consist of:

- The Draft EIR or revision of the draft
- Comments and recommendations received on the Draft EIR either verbatim or in summary
- A list of persons, organizations, and public agencies commenting on the Draft EIR
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process
- Any other information added by the Lead Agency

The Draft EIR is hereby incorporated by reference. This document contains the list of commenters, the comment letters, and responses to the significant environmental points raised in the comments.

ORGANIZATION OF THIS DOCUMENT

For this Final EIR, comments and responses are grouped by comment letter. As the subject matter of one topic may overlap between letters, the reader must occasionally refer to more than one letter and response to review all the information on a given subject. Cross references are provided to assist the reader. Responses to these comments are included in this document to provide additional information for use by the decision makers.

The comments and responses that make up the Final EIR, in conjunction with the Draft EIR, as amended by the text changes, constitute the EIR that will be considered for certification by the Agency.

The Final EIR is organized as follows:

CHAPTER 1 – INTRODUCTION

This chapter includes a summary of the project description and the process and requirements of a Final EIR.

CHAPTER 2 - TEXT CHANGES TO THE DRAFT EIR

This chapter lists the text changes to the Draft EIR.

CHAPTER 3 – COMMENTS AND RESPONSES

The first section of this chapter contains a list of all of the agencies or persons who submitted comments on the Draft EIR during the public review period, ordered by agency, organization, and date.

The second section in this chapter contains the written comment letters and verbal comments received on the Draft EIR and the corresponding response to each comment. Each letter or verbal comment and each issue within a letter has been given a number. Responses are provided after the letter or verbal comment in the order in which the issue was assigned. Where appropriate, responses are cross-referenced between letters.

CHAPTER 4 – MITIGATION MONITORING PLAN

This chapter contains the Mitigation Monitoring Plan (MMP) to aid the Agency and the City in their implementation and monitoring of measures adopted in the EIR.

PUBLIC PARTICIPATION AND REVIEW

The Agency notified all responsible and trustee agencies and interested groups, organizations, and individuals that the Draft EIR for the Redevelopment Plan was available for review. The following list of actions took place during the preparation, distribution, and review of the Draft EIR:

- A Notice of Preparation (NOP) for an EIR was filed with the Governor's Office of Planning and Research, State Clearinghouse and Planning Unit (State Clearinghouse) on October 14, 2010. The 30-day public review comment period for the NOP was established starting on October 14, 2010 and ending on November 12, 2010.
- A Notice of Completion (NOC) and copies of the Draft EIR were filed with the State Clearinghouse on December 27, 2010. An official 45-day public review period for the Draft EIR was established by the State Clearinghouse, beginning on December 27, 2010 and ending on February 9, 2011 and a Notice of Availability (NOA) was distributed to interested groups, organizations, and individuals.
- The Notice of Availability (NOA) was published in a local newspaper of general circulation on December 27, 2010.
- Copies of the Draft EIR were available for review at the City of Placerville, City Hall, Second Floor, 3101 Center Street, Placerville, CA 95667, and on the City website at http://ci.placerville.ca.us/depts/commdev/planning_division/environmental_documents.asp.

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2. CHANGES TO THE DRAFT EIR

INTRODUCTION

This chapter presents minor corrections and revisions made to the Draft EIR initiated by commenting agencies, the public, staff, and/or consultants based on their on-going review. New text is indicated in blue underline and text to be deleted is reflected by ~~red-strike through~~. Text changes are presented in the page order in which they appear in the Draft EIR.

DRAFT EIR CHAPTER 2.0 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Draft EIR page 2.0-2 is hereby amended as follows:

PROJECT-SPECIFIC SIGNIFICANT AND UNAVOIDABLE IMPACTS

The project-specific significant and unavoidable environmental impacts of the proposed project identified in Chapter 6 (Environmental Analysis) include:

- Impact 6.~~7~~⁸-1 Redevelopment-engendered development and infrastructure projects could result in construction noise at sensitive receptors. This would be a potentially significant and unavoidable impact.

CUMULATIVE SIGNIFICANT AND UNAVOIDABLE IMPACTS

The significant and unavoidable environmental impacts of the cumulative environment, as identified and discussed in Chapter 6 (Environmental Analysis), are:

- Impact 6.4-4 Redevelopment projects and redevelopment-engendered development could contribute to the cumulative degradation or loss of archaeological or historic resources, including human remains. This would be ~~a~~ potentially cumulatively considerable.

Draft EIR page 2.0-12, Table 2.0-1 is hereby amended as follows:

Impact	Significance Prior to Mitigation ¹	Mitigation Measure(s)	Significance After Mitigation
6.4 Cultural and Historic Resources			
Impact 6.4-1 Redevelopment projects and redevelopment-engendered development could cause a substantial adverse change in the	PS	The following mitigation measure is identified for any proposed redevelopment project within the Project Area: 6.4-1a The North Central Information Center (NCIC), <u>Native American Heritage Commission (NAHC)</u> , and the <u>United Auburn Indian Community of the Auburn Rancheria (UAIC)</u> shall be consulted to determine if a proposed project would require archaeological study and/or testing be conducted as part of the site-specific environmental review. Recommended study	LS

¹ LS = Less-than-Significant PS = Potentially Significant S = Significant SU = Significant and Unavoidable

2. CHANGES TO THE DRAFT EIR

Impact	Significance Prior to Mitigation ¹	Mitigation Measure(s)	Significance After Mitigation
significance of an archaeological resource, including human remains		<p>and/or testing shall be completed prior to completion of environmental review.</p> <p>6.4-1b Foremen and key members of major excavation, trenching, and grading for sites preparation shall be instructed to be wary of the possibility of destruction of buried cultural resource materials. They shall be instructed to recognize signs of prehistoric use and their responsibility to report any such finds (or suspected finds) immediately, as specified by measure 6.4-1c below, so damage to such resources may be prevented.</p> <p>6.4-1c Should any cultural resources, such as structural features, unusual amounts of bone or shell, artifacts, human remains, or architectural remains be encountered during any development activities, all work within 20 meters of the find shall be suspended and a qualified archaeologist shall be consulted to develop, if necessary, further mitigation measures to reduce any archaeological impact to a less-than-significant level before construction continues. Such measures could include (but would not be limited to) researching and identifying the history of the resource(s), mapping the locations, and photographing the resource. In addition, pursuant to Section 5097.98 of the PRC, and Section 7050.5 of the State Health and Safety Code, in the event of the discovery of any human remains, all work is to stop and the County Coroner shall be immediately notified. If the remains are determined to be Native American, the UAIC will be consulted and the guidelines of the Native American Heritage Commission (NAHC) shall be adhered to in the treatment and disposition of the remains.</p>	

Draft EIR page 2.0-13, Table 2.0-1 is hereby amended as follows:

Impact	Significance Prior to Mitigation ²	Mitigation Measure(s)	Significance After Mitigation
6.4 Cultural and Historic Resources			
Impact 6.4-3 Redevelopment projects and redevelopment-engendered development could result in the potential alteration, removal, or destruction of historic resources.	PS	6.4-3a As part of any OPA, DDA, or other Agency action or project that would affect any structure or feature over 45 years old that has not been evaluated, the buildings shall first be evaluated for eligibility for listing in the CRHR. The determination of eligibility shall be made by an expert who, at a minimum, meets the Secretary of the Interior's Professional Qualification	LS

² LS = Less-than-Significant PS = Potentially Significant S = Significant SU = Significant and Unavoidable

Impact	Significance Prior to Mitigation ²	Mitigation Measure(s)	Significance After Mitigation
		Standards for Architectural History . This evaluation shall occur through the preparation of DPR 523 forms for each building and standard CEQA evaluation, and shall include consultation with the El Dorado County Historical Society .	

Draft EIR page 2.0-14, Table 2.0-1 is hereby amended as follows:

Impact	Significance Prior to Mitigation ³	Mitigation Measure(s)	Significance After Mitigation
6.4 Cultural and Historic Resources			
Impact 6.4-4 Redevelopment projects and redevelopment-engendered development could contribute to the cumulative degradation or loss of paleontological, archaeological, or historic resources, including human remains	PS	None available beyond those identified for project-specific mitigation.	PSU

Draft EIR page 2.0-18, from Table 2.0-1 is hereby amended as follows:

Impact	Significance Prior to Mitigation ³	Mitigation Measure(s)	Significance After Mitigation
6.7 Noise			
Impact 6.7-1 Redevelopment-engendered development and infrastructure projects could result in construction noise at sensitive receptors	PS	None available beyond adopted City policies to regulate noise. 6.7-1 The Redevelopment Agency shall ensure construction contracts require that all construction activities shall be limited to between 7:00 am and 7:00 pm on weekdays, and 8:00 am to 7:00 pm on Saturday.	PSU
Impact 6.7-2 Redevelopment-engendered development could result in increased ambient noise levels at noise-sensitive land uses and could expose new land uses to noise that would	LS	None required	LS

³ LS = Less-than-Significant PS = Potentially Significant S = Significant SU = Significant and Unavoidable

2. CHANGES TO THE DRAFT EIR

Impact	Significance Prior to Mitigation ³	Mitigation Measure(s)	Significance After Mitigation
conflict with local planning guidelines or noise ordinance criteria			
Impact 6.78-3 Redevelopment-engendered development could result in an increase in cumulative community noise impacts	LS	None required	LS

DRAFT EIR CHAPTER 4.0 ALTERNATIVES

Draft EIR page 4.0-4, first paragraph, is hereby amended as follows:

PROJECT-SPECIFIC SIGNIFICANT AND UNAVOIDABLE IMPACTS

The project-specific significant and unavoidable environmental impacts of the proposed project identified in Chapter 6 (Environmental Analysis) include:

- Impact 6.78-1 Redevelopment-engendered development and infrastructure projects could result in construction noise at sensitive receptors. This would be a potentially significant and unavoidable impact.

CUMULATIVE SIGNIFICANT AND UNAVOIDABLE IMPACTS

The significant and unavoidable environmental impacts of the cumulative environment, as identified and discussed in Chapter 6 (Environmental Analysis), are:

- Impact 6.4-4 Redevelopment projects and redevelopment-engendered development could contribute to the cumulative degradation or loss of archaeological or historic resources, including human remains. This would be a potentially cumulatively considerable.

DRAFT EIR CHAPTER 6.2 AIR QUALITY

Draft EIR Table 6.1-1 on pages 6.1-3 through 6.1-4 is hereby amended as follows. Please note that the changes to this table do not affect the numerical standards, only the inclusion of methods and their associated notes.

**TABLE 6.2-1
NATIONAL AND CALIFORNIA AMBIENT AIR QUALITY STANDARDS**

Pollutant	Averaging Time	California Standards ^a		Federal Standards ^b		
		Concentration ^c	Method ^d	Primary ^{c, d, e}	Secondary ^{c, e, f}	Method ^g
Ozone (O ₃)	1 Hour	0.09 ppm (180 µg/m ³)	<u>Ultraviolet Photometry</u>	--	Same as Primary Standard	<u>Ultraviolet Photometry</u>
	8 Hour	0.070 ppm (137 µg/m ³)		0.075 ppm (147 µg/m ³)		

2. CHANGES TO THE DRAFT EIR

Pollutant	Averaging Time	California Standards ^a		Federal Standards ^b		
		Concentration ^c	<u>Method ^d</u>	Primary ^{c, d, e}	Secondary ^{c, f}	<u>Method ^g</u>
Respirable Particulate Matter (PM ₁₀)	24 Hour	50 µg/m ³	<u>Gravimetric or Beta Attenuation</u>	150 µg/m ³	Same as Primary Standard	<u>Inertial Separation and Gravimetric Analysis</u>
	Annual Arithmetic Mean	20 µg/m ³		--		
Fine Particulate Matter (PM _{2.5})	24 Hour	No separate state standard		35 µg/m ³	Same as Primary Standard	<u>Inertial Separation and Gravimetric Analysis</u>
	Annual Arithmetic Mean	12 µg/m ³	<u>Gravimetric or Beta Attenuation</u>	15.0 µg/m ³		
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m ³)	<u>Non-Dispersive Infrared Photometry (NDIR)</u>	9 ppm (10 mg/m ³)	None	<u>Non-Dispersive Infrared Photometry (NDIR)</u>
	1 Hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m3)		--	--	--
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	<u>Gas Phase Chemiluminescence</u>	0.053 ppm (100 µg/m ³) ^h <i>(see footnote f)</i>	Same as Primary Standard	<u>Gas Phase Chemiluminescence</u>
	1 Hour	0.18 ppm (339 µg/m ³)		100 ppb (188 µg/m3) ^h <i>(see footnote f)</i>	None	
Sulfur Dioxide (SO ₂)	24 Hour	0.04 ppm (105 µg/m3)	<u>Ultraviolet Fluorescence</u>	--	--	<u>Ultraviolet Fluorescence: Spectrophotometry (Pararosaniline Method) i</u>
	3 Hour	--		--	0.5 ppm (1300 µg/m ³) ^j <i>(see footnote f)</i>	
	1 Hour	0.25 ppm (655 µg/m ³)		75 ppb (196 µg/m3) ^j <i>(see footnote f)</i>	--	
Lead (Pb) ^{h, i}	30 Day Average	1.5 µg/m ³	<u>Atomic Absorption</u>	--	--	<u>High Volume Sampler and Atomic Absorption</u>
	Calendar Quarter	--		1.5 µg/m ³	Same as Primary Standard	
	Rolling 3-Month Average ^{h, k}	--		0.15 µg/m ³		
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per km – visibility within 10 mi or more due to particles when the relative humidity is less than 70%.		No Federal Standards		
Sulfates (SO ₄)	24 Hour	25 µg/m ³	<u>Ion Chromatography</u>	No Federal Standards		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	<u>Ultraviolet Fluorescence</u>	No Federal Standards		
Vinyl Chloride ^{h, j}	24 Hour	0.01 ppm (26 µg/m ³)	<u>Gas Chromatography</u>	No Federal Standards		

^a California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter— PM₁₀, PM_{2.5}, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations (CCR).

^b National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24 hour standard is attained when 98% of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact EPA for further clarification and current federal policies.

2. CHANGES TO THE DRAFT EIR

^c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; parts per million (ppm) in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

^d Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.

^{de} National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

^{ef} National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

^g Reference method as described by the EPA. An —equivalent method” of measurement may be used but must have a —onsistent relationship to the reference method” and must be approved by the EPA.

^{fh} To attain this standard, the 3-year average of the 98th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 0.100 ppm (effective January 22, 2010). Note that the EPA standards are in units of parts per billion (ppb). California standards are in units of ppm. To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standards of 53 ppb and 100 ppb are identical to 0.053 ppm and 0.100 ppm, respectively.

^{gi} On June 2, 2010, the U.S. EPA established a new 1-hour sulfur dioxide standard, effective August 23, 2010, which is based on the 3-year average of the annual 99th percentile of 1-hour daily maximum concentrations. EPA also proposed a new automated Federal Reference Method (FRM) using ultraviolet technology, but will retain the older pararosaniline methods until the new FRM have adequately permeated State monitoring networks. The EPA also revoked both the existing 24-hour sulfur dioxide standard of 0.14 ppm and the annual primary sulfur dioxide standard of 0.030 ppm, effective August 23, 2010. The secondary sulfur dioxide standard was not revised at that time; however, the secondary standard is undergoing a separate review by EPA. Note that the new standard is in units of ppb. California standards are in units of ppm. To directly compare the new primary national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

^{hi} The CARB has identified lead and vinyl chloride as ‘toxic air contaminants’ (TACs) with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

^{ik} National lead standard, rolling 3-month average: final rule signed October 15, 2008.

Source: California Air Resources Board, 9/8/10, <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>, [last](#) accessed ~~11/2/10~~ February 17, 2011

DRAFT EIR CHAPTER 6.4 CULTURAL RESOURCES

Draft EIR Mitigation Measure 6.4-1 on Draft EIR pages 6.4-17 to 6.4-18 is hereby amended as follows:

Mitigation

The following mitigation measure is identified for any proposed redevelopment project within the Project Area:

6.4-1a *The North Central Information Center (NCIC), [Native American Heritage Commission \(NAHC\)](#), and the [United Auburn Indian Community of the Auburn Rancheria \(UAIC\)](#) shall be consulted to determine if a proposed project would require archaeological study and/or testing be conducted as part of the site-specific environmental review. Recommended study and/or testing shall be completed prior to completion of environmental review.*

- 6.4-1b Foremen and key members of major excavation, trenching, and grading for sites preparation shall be instructed to be wary of the possibility of destruction of buried cultural resource materials. They shall be instructed to recognize signs of prehistoric use and their responsibility to report any such finds (or suspected finds) immediately, as specified by measure 6.4-1c below, so damage to such resources may be prevented.
- 6.4-1c Should any cultural resources, such as structural features, unusual amounts of bone or shell, artifacts, human remains, or architectural remains be encountered during any development activities, all work within 20 meters of the find shall be suspended and a qualified archaeologist shall be consulted to develop, if necessary, further mitigation measures to reduce any archaeological impact to a less-than-significant level before construction continues. Such measures could include (but would not be limited to) researching and identifying the history of the resource(s), mapping the locations, and photographing the resource. In addition, pursuant to Section 5097.98 of the PRC, and Section 7050.5 of the State Health and Safety Code, in the event of the discovery of any human remains, all work is to stop and the County Coroner shall be immediately notified. If the remains are determined to be Native American, [the UAIC will be consulted and the](#) guidelines of the Native American Heritage Commission (NAHC) shall be adhered to in the treatment and disposition of the remains.

Significance after Mitigation

Less than significant

Draft EIR Mitigation Measure 6.4-3a on Draft EIR page 6.4-19 is hereby amended as follows:

- 6.4-3a As part of any OPA, DDA, or other Agency action or project that would affect any structure or feature over 45 years old that has not been evaluated, the buildings shall first be evaluated for eligibility for listing in the CRHR. This evaluation shall occur through the preparation of DPR 523 forms for each building and standard CEQA evaluation, [and shall include consultation with the El Dorado County Historical Society.](#)

Draft EIR Impact 6.4-4 on Draft EIR page 6.4-20 is hereby amended as follows:

Impact 6.4-4 Redevelopment projects and redevelopment-engendered development could contribute to the cumulative degradation or loss of paleontological, archaeological, or historic resources, including human remains. This would be a [potentially](#) cumulatively considerable.

Based upon previous cultural resource surveys and research, the area that comprises the City and its vicinity has been inhabited by prehistoric peoples for thousands of years, and by historic peoples since the 1800s. Redevelopment activities and projects, in combination with other development in the City and County, could contribute to the loss of significant archaeological or historic resources. Because all archaeological or historic resources are unique and non-renewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. The loss of any one archaeological site affects all others in a region because these resources are best understood in the context of the entirety of the cultural system of which they are a part.

The boundaries of an archaeologically or historically important site extend beyond any project site boundaries. As a result, a meaningful approach to preserving and managing

2. CHANGES TO THE DRAFT EIR

cultural resources must focus on the likely distribution of cultural resources, rather than on project or parcel boundaries. The cultural system is represented archaeologically by the total inventory of all sites and other cultural remains in the region. Proper planning and appropriate mitigation can help to capture and preserve knowledge of such resources and can provide opportunities for increasing our understanding of the past environmental conditions and cultures by recording data about sites discovered and preserving artifacts found. Federal, state, and local laws are also in place, as discussed above, that protect these resources in most instances. Even so, it is not always feasible to protect these resources, particularly when preservation in place would frustrate implementation of projects, and for this reason, the cumulative effects of the redevelopment activities and other projects in the City and County would be significant. Moreover, because redevelopment activities and projects in the Project Area have the potential to adversely affect significant archaeological resources that are unique and non-renewable members of finite classes, the incremental contribution to these cumulative effects would itself be potentially cumulatively considerable. As discussed above, damage or destruction of some archaeological, paleontological or historic resources in the Project Area may be mitigated on a project-by-project basis. However, any loss of cultural resources associated with redevelopment projects would contribute to a region-wide impact that cannot be remedied. ~~Therefore~~ Whereas it is unknown at this time whether all future redevelopment projects can mitigate or avoid the loss of cultural resources, this is considered a **potentially significant impact**.

Mitigation

None available beyond those identified for project-specific mitigation.

Significance after Mitigation

Project-specific mitigation measures would reduce the magnitude of potential cumulative impacts to historic resources, but not to less-than-cumulatively considerable levels. It is unknown at this time whether all future redevelopment projects can mitigate or avoid the loss of cultural resources, thus this impact remains **potentially significant and unavoidable**.

DRAFT EIR CHAPTER 6.7 NOISE

Draft EIR page 6.7-10, Mitigation, is hereby amended as follows:

Mitigation

~~None available beyond adopted City policies to regulate noise.~~

6.7-1 The Redevelopment Agency shall ensure construction contracts require that all construction activities shall be limited to between 7:00 am and 7:00 pm on weekdays, and 8:00 am to 7:00 pm on Saturday.

Significance after Mitigation

This mitigation measure would reduce the magnitude of the impact, but not to less-than-significant levels. Construction noise, even during daytime operating hours, may remain significant, although temporary, at Project Area sensitive receptors. Therefore, this impact remains **potentially significant and unavoidable**.

DRAFT EIR CHAPTER 6.8 PUBLIC SERVICES

Draft EIR page 6.8-8, paragraph two, is hereby amended as follows:

PUBLIC SCHOOLS

The Project Area is served by ~~three~~ two K-8 school districts, one 9-12 school district, one community college district and a county office of education. The Placerville Union School District and Mother Lode Union School District serve different portions of the project area. The El Dorado Union High School District, Los Rios Community College District, and El Dorado County Office of Education serve the entire Project Area.

Draft EIR page 6.8-11, paragraph three, is hereby amended as follows:

The National Fire Protection Association (NFPA) nationally recognized average fire district staffing level is 1.5 firefighters per 1,000 population in a rural area and 3 firefighters per 1,000 in an urban area. Urban is defined as a minimum density of ~~100~~ 1,000 persons per square mile; most of the Project Area is considered an urban area ~~under these criteria as defined by the United States Census Bureau~~. However, because the EDCFD serves both rural and urban areas, the overall firefighter goal is mixed, and depends on the level of staffing within the Project Area. In 2006, the EDCFD maintained a ratio of 1.9 firefighters per 1,000 residents with 68.3 firefighters; they currently provide 103 firefighters, and have improved their ISO rating from 6/9 to 5. It is anticipated that additional staff will be required and added as population increases, consistent with levels identified in the General Plan.

DRAFT EIR CHAPTER 6.10 TRANSPORTATION

The Draft EIR page 6.10-9, first section, is hereby amended as follows:

STATE***California Department of Transportation***

Caltrans is responsible for planning, designing, building, operating, and maintaining the State Highway System (SHS). US-50 and SR-49, which traverse the Project Area, are part of the SHS maintained by Caltrans. The Project Area is located within Caltrans District 3, with offices in Marysville. Caltrans' Transportation Planning Division is responsible for developing statewide, long-range plans for transportation improvements, while the Transportation Programming Division sets priorities for various State and federal transportation funding programs.

~~The State Route 50 Transportation Concept Report (Caltrans 1998) identifies the 20-year concept (through 2018) for the corridor as a six-lane freeway with two general-purpose lanes and one high-occupancy vehicle lane (HOV) lane in each direction from the county line to the future Silva Valley interchange. The ultimate facility concept (beyond 2018) for the corridor is an eight-lane freeway with three general-purpose lanes and one HOV lane in each direction from the county line to west of Placerville. Through the City, the 20-year concept will add a third eastbound lane and provide other associated operational improvements such as right-turn lanes and extended left-turn pockets. Ultimately, this section of the corridor is identified as a four-lane expressway. East of Placerville, the concept and ultimate facility are proposed to remain the same as the current configuration due to topographical and environmental constraints except for the addition of passing lanes~~

2. CHANGES TO THE DRAFT EIR

~~in some sections. Caltrans has established a concept LOS of E from the El Dorado County line to Ice House Road east of the Project Area.~~

The Highway 50 2009 US 50 Corridor System Management Plan (CSMP) (Caltrans 2009) identifies the 20-year concept for the corridor. The 20-year concept for the segment of US 50 from Missouri Flat Road to freeway end in the City of Placerville envisions a 4-lane freeway with auxiliary lanes. The segment from the end of freeway in the City to Bedford Avenue is a 4-lane expressway, and the segment from Bedford Avenue to Cedar Grove Exit is a 4-lane freeway with auxiliary lanes to Smith Flat and a 4-lane expressway to Camino. The ultimate facility (beyond 20-years) identified in the 2009 US 50 CSMP for the segment from Missouri Flat Road to the freeway end in the City is a 4-lane freeway with auxiliary lanes. The segment to the end of freeway in the City to Bedford Avenue is a 4-lane expressway, and the segment from Bedford Avenue to Cedar Grove Exit is a 4-lane freeway with auxiliary lanes. Almost all US 50 segments are forecasted to operate under LOS ~~F~~" conditions in 20 years under the No-Build and Build scenarios.

The Route Transportation Concept Report (TCR), State Route 49 (Caltrans 2000) contains the 20-year improvement concept for SR-49. The ~~route concept~~ TCR recognizes the unique nature of SR-49 in terms of historical and topographic constraints, which preclude the possibility of significantly improving the highway on its existing alignment. ~~As such, SR 49 would remain a two-lane conventional highway through the County. Some improvements, such as widening to the Caltrans 40-foot pavement standard, are identified to achieve the full concept facility.~~ The Ultimate Facility identified in the 2000 SR 49 TCR for the segment of SR-49 from Sacramento Street to the junction of SR-193/49 is a 2/4-lane expressway. The concept LOS is F south of the community of El Dorado and through the City. Ultimately, some segments would require widening to four lanes or spot improvements (i.e., passing lanes or improvements for bicycle and pedestrian travel).

Caltrans is currently updating the SR 49 TCR. The draft will be circulated to all cities, counties, regional transportation agencies and interested parties, including the City of Placerville and El Dorado County, for review and comment.

DRAFT EIR CHAPTER 7.0 CEQA CONSIDERATIONS

Draft EIR page 7.0-3, paragraph 7, is hereby amended as follows:

Impact 6.4-4 Redevelopment projects and redevelopment-engendered development could contribute to the cumulative degradation or loss of paleontological, archaeological, or historic resources, including human remains. This would be ~~a~~ **potentially cumulatively considerable**.

Draft EIR page 7.0-4 is hereby amended as follows:

PROJECT-SPECIFIC SIGNIFICANT AND UNAVOIDABLE IMPACTS

The project-specific significant and unavoidable environmental impacts of the proposed project identified in Chapter 6 (Environmental Analysis) include:

Impact 6.~~7~~8-1 Redevelopment-engendered development and infrastructure projects could result in construction noise at sensitive receptors. This would be a potentially significant and unavoidable impact.

CUMULATIVE SIGNIFICANT AND UNAVOIDABLE IMPACTS

The cumulative significant and unavoidable environmental impacts of the cumulative environment, as identified and discussed in Chapter 6 (Environmental Analysis), include:

- Impact 6.4-4 Redevelopment projects and redevelopment-engendered development could contribute to the cumulative degradation or loss of paleontological, archaeological, or historic resources, including human remains. This would be [potentially](#) cumulatively considerable.

2. CHANGES TO THE DRAFT EIR

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3. COMMENTS AND RESPONSES

All comment letters on the Placerville Redevelopment Plan Draft EIR are listed below (Table 3-1) with an alphabetic designation assigned for cross-referencing purposes. This list represents all comments received during the comment period. The verbatim comment letters, and responses to environmental issues raised in those letters, are presented in this section. The alphabetic designation appears in the upper right corner of each letter. Changes to the Draft Environmental Impact Report are located in previous Section 2.

**TABLE 3-1
LIST OF AGENCIES AND PERSONS COMMENTING**

Letter	Source	Commenter	Date Received
Written Comments			
A	California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit (SCH)	Scott Morgan, Director State Clearinghouse	2011 FEB 10
B	United Auburn Indian Community of the Auburn Rancheria (UAIC)	Marcos Guerrero, Tribal Preservation Committee	2010 DEC 27
C	El Dorado County Historical Society (EDCHS)	Joyce Thompson, Vice President, El Dorado County Historical Society	2011 JAN 13
D	State of California Department of Transportation, District 3 (Caltrans)	Kelly Eagan, US 50 Corridor Manager	2011 FEB 08
E	El Dorado County Office of Education (EDCOE)	Terena Mendonca, Deputy Superintendent, Administrative Services	2011 FEB 08
F	California Preservation Foundation (CPF)	Jennifer M. Gates, AICP, Field Services Director, In partnership with the National Trust for Historic Preservation	2011 FEB 09
G	Michael Drobesh		2011 FEB 09
H	Sharlene S. McCaslin		2011 FEB 09
I	State of California Office of Historic Preservation, Department of Parks and Recreation (SHPO)	Milford Wayne Donaldson, FAIA, State Historic Preservation Officer	2011 FEB 09
Verbal Comments			
J	Planning Commission Meeting	David Cole Mary Dante Sharlene McCaslin Pete McQuillen Kathleen Newell Sue Taylor Chuck Wolf	2011 JAN 18
K	Planning Commission Meeting	Sharlene McCaslin Sue Taylor	2011 FEB 01

COMMENT LETTERS

The written comments received on the Draft EIR and the responses to those comments are provided in this section. Each comment letter received is reproduced in its entirety and is followed by responses to the comment letter.

The first letter (Letter A, on the following pages) is not a comment letter, but a formal disclosure from the State Clearinghouse. The letter states that the State Clearinghouse received the Draft EIR and it was sent to select state agencies for review from December 27, 2010 to February 9, 2011.



JERRY BROWN
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



February 10, 2011

Cleve Morris
City of Placerville Redevelopment Agency
3101 Center Street
Placerville, CA 95667

Subject: Placerville Redevelopment Plan Adoption
SCH#: 2010102025

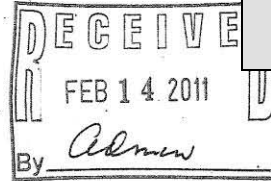
Dear Cleve Morris:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on February 9, 2011, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse



RECEIVED

FEB 15 2011

CITY OF PLACERVILLE

RECEIVED

FEB 15 2011

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

3. COMMENT AND RESPONSES

Document Details Report State Clearinghouse Data Base

SCH# 2010102025
Project Title Placerville Redevelopment Plan Adoption
Lead Agency Placerville, City of

Type EIR Draft EIR

Description The Proposed Project entails the adoption of a Redevelopment Plan for a 1,077-acre Redevelopment Project Area (Project Area) within the jurisdiction of the City of Placerville (City) and adjacent El Dorado County unincorporated areas. The proposed Redevelopment Plan would authorize the use of redevelopment tools to remove blight within the project area over a 30-year period, following adoption of the Redevelopment Plan in mid-2011.

Lead Agency Contact

Name Cleve Morris
Agency City of Placerville Redevelopment Agency
Phone 530-642-5200 **Fax**
email jdriscoll@cityofplacerville.org
Address 3101 Center Street
City Placerville **State** CA **Zip** 95667

Project Location

County El Dorado
City Placerville
Region
Lat / Long
Cross Streets US 50 and SR-49
Parcel No. Various
Township **Range** **Section** **Base**

Proximity to:

Highways SR 49, US 50
Airports Placerville
Railways No
Waterways No
Schools Various
Land Use The existing uses in the Project Area primarily consist of commercial land uses. Other uses include residential, industrial, and institutional.

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Noise; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 2; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 3; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Toxic Substances Control; Native American Heritage Commission

Date Received 12/27/2010 **Start of Review** 12/27/2010 **End of Review** 02/09/2011

Note: Blanks in data fields result from insufficient information provided by lead agency.

COMMENT LETTER A

STATE OF CALIFORNIA GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

February 10, 2011

Scott Morgan
Director, State Clearinghouse

Response to Comment A-1

This letter confirms that the State Clearinghouse (SCH) circulated the Draft EIR to selected state agencies for review. The SCH comment period was initiated on December 27, 2010 and closed on February 9, 2011.

Two state agencies commented on the Draft EIR: the Department of Transportation (Caltrans) and the Office of Historic Preservation, Department of Parks and Recreation (SHPO). The responses to these comments are discussed below in letters D and I, respectively.

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MIWOK
MAIDU

United Auburn Indian Community
of the Auburn Rancheria

David Keyser
Chairperson

Kimberly DuBach
Vice Chair

Gene Whitehouse
Secretary

Brenda Conway
Treasurer

Calvin Moman
Council Member

December 27, 2010

B

Gail M. Ervin, Principal
The Ervin Consulting Group
8561 Almond Bluff Court
Orangevale, California 95662-4419

Subject: Proposed Placerville Redevelopment Plan Adoption in the City of Placerville
and El Dorado County

Dear Ms. Ervin,

Thank you for requesting information regarding the above referenced project. The United Auburn Indian Community (UAIC) of the Auburn Rancheria is comprised of Miwok and Nisenan (Southern Maidu) people whose tribal lands are within Placer County and ancestral territory spans into Eldorado, Nevada, Sacramento, Sierra, Sutter, and Yuba counties. The UAIC is concerned about development within its aboriginal territory that has potential to impact the lifeways, cultural sites, and landscapes that may be of sacred or ceremonial significance. We appreciate the opportunity to comment on this and other projects in your jurisdiction.

In order to ascertain whether or not the project could affect cultural resources that may be of importance to the UAIC, we would like to receive copies of any archaeological reports that have been, or will be, completed for the project. We also request copies of future environmental documents for the proposed project so that we have the opportunity to comment on potential impacts and proposed mitigation measures related to cultural resources. The UAIC would also like the opportunity to have our cultural consultants accompany you during the field survey. The information gathered will provide us with a better understanding of the project and cultural resources on site and is invaluable for consultation purposes.

B-1

The UAIC's preservation committee has identified cultural resources within or in close proximity to your project area, and would like to request a site visit and meet with you regarding this project. Thank you again for taking these matters into consideration, and for involving the UAIC early in the planning process. We look forward to reviewing the aforementioned documents as requested. Please contact Marcos Guerrero, cultural resources specialist, at (530) 883-2364 or email at mguerrero@auburnrancheria.com.

Sincerely,

Greg Baker,
Tribal Administrator

CC: Marcos Guerrero, UAIC

COMMENT LETTER B

UNITED AUBURN INDIAN COMMUNITY OF THE AUBURN RANCHERIA

December 27, 2010

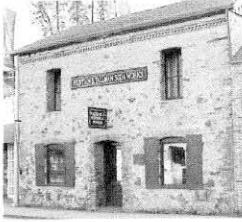
Marcos Guerrero
Tribal Preservation Committee

Response to Comment B-1

Although this letter was sent in response to a request for information on the Project Area, a public response is being provided in this document.

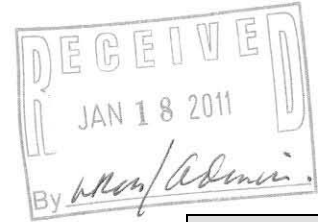
At this point in time, there are no specific projects identified in the project area, thus there are no specific sites to review and no field studies have been conducted. The Program EIR for the project was publicly noticed and circulated from December 27, 2010 through February 9, 2011. In Draft EIR Chapter 6.4, Cultural Resource impacts are identified as potentially significant, and future site-specific projects are required to implement Mitigation Measures (MM) 6.4-1a through 6.4-1c. As provided in the Chapter 2 (Changes to the Draft Environmental Impact Report) of this document and the Mitigation Monitoring Plan, these mitigation measures have been amended to specifically include consultation with the Native American Heritage Commission (NAHC) and the United Auburn Indian Community of the Auburn Rancheria (UAIC), as follows:

- 6.4-0a *The North Central Information Center (NCIC), [Native American Heritage Commission \(NAHC\)](#), and the [United Auburn Indian Community of the Auburn Rancheria \(UAIC\)](#) shall be consulted to determine if a proposed project would require archaeological study and/or testing be conducted as part of the site-specific environmental review. Recommended study and/or testing shall be completed prior to completion of environmental review.*
- 6.4-0b *Foremen and key members of major excavation, trenching, and grading for sites preparation shall be instructed to be wary of the possibility of destruction of buried cultural resource materials. They shall be instructed to recognize signs of prehistoric use and their responsibility to report any such finds (or suspected finds) immediately, as specified by measure 6.4-1c below, so damage to such resources may be prevented.*
- 6.4-0c *Should any cultural resources, such as structural features, unusual amounts of bone or shell, artifacts, human remains, or architectural remains be encountered during any development activities, all work within 20 meters of the find shall be suspended and a qualified archaeologist shall be consulted to develop, if necessary, further mitigation measures to reduce any archaeological impact to a less-than-significant level before construction continues. Such measures could include (but would not be limited to) researching and identifying the history of the resource(s), mapping the locations, and photographing the resource. In addition, pursuant to Section 5097.98 of the PRC, and Section 7050.5 of the State Health and Safety Code, in the event of the discovery of any human remains, all work is to stop and the County Coroner shall be immediately notified. If the remains are determined to be Native American, [the UAIC will be consulted and the](#) guidelines of the Native American Heritage Commission (NAHC) shall be adhered to in the treatment and disposition of the remains.*



Fountain Tallman Museum

EL DORADO COUNTY HISTORICAL SOCIETY
524 Main Street
Placerville, CA 95667



C

January 13, 2011

Cleve Morris, City Manager
 Placerville Redevelopment Agency
 3101 Center Street
 Placerville, CA 95667

Dear Mr. Morris,

The El Dorado County Historical Society Board of Directors reviews projects planned in El Dorado County for possible impact on cultural resources. Also, as the owner of the Fountain & Tallman Soda Works Building, a building on the National Register, we are particularly concerned about the possible impacts of Redevelopment on the historic preservation of Placerville's older buildings. After reviewing the Placerville Redevelopment Plan Draft EIR, Doug Walker, a member of the Historical Society's Board of Directors, emphasized the need for Redevelopment projects to follow the existing ordinances and General Plan as stated in the Draft EIR in Chapter 6.4. He also states that there are multiple known prehistoric sites which fall within the project boundaries and have not been recognized in the document.

C-1

We encourage anyone planning redevelopment projects to use the historical resources at the El Dorado County Historical Museum for additional research on Placerville's streetscape, buildings and infrastructure. They can be reached at (530) 621-5865 or by email at museum@edcgov.us to set up an appointment. Their website is www.edcgov.us/museum.

The El Dorado County Historical Society Board of Directors would like to be notified of any future projects that take place in Placerville so that we can review them for possible impacts on known cultural resources. Thank you for the opportunity to participate in this process.

Sincerely,

Joyce Thompson, Vice President
 El Dorado County Historical Society



Our mission is to honor the people who came before us by rescuing, preserving, researching and displaying the county's rich history to ensure that its significance will be appreciated for generations to come.

COMMENT LETTER C

EL DORADO COUNTY HISTORICAL SOCIETY

January 13, 2011

Joyce Thompson,
Vice President, El Dorado County Historical Society

Response to Comment C-1

The Draft EIR recognized the archaeological sensitivity of the Project Area. Due to the size of the Project Area, the lack of site-specific projects at this time, the 30 year duration of the Redevelopment Plan, and the policy of the State Office of Historic Preservation (SHPO) to consider records searches viable for a five-year period, no additional record search was completed for the Project Area at this time.

The Project Area was determined to be highly sensitive for cultural resources. Impact 6.4-1 determined that redevelopment projects and redevelopment-engendered development could cause a substantial adverse change in the significance of an archaeological resource, including human remains. Mitigation Measures (MM) 6.4-1a through 6.4-1c have been identified to protect resources during any redevelopment project construction, and are included in the Mitigation Monitoring Plan (MMP) located at the end of this document. These measures require a project to consult with the North Central Information Center, Native American Heritage Commission (NAHC), and the United Auburn Indian Community of the Auburn Rancheria (UAIC) contacts on a project-by-project basis.

Please also see response to comment B-1, above.

Regarding historic resources, there have been several comments on the Draft EIR indicating a need for more expertise and community coordination for protecting historic resources (please see Responses to Comments B-1, F-1, and H-12). Based on these comments, Mitigation Measure 6.4-3a is hereby amended as follows:

6.4-3a As part of any OPA, DDA, or other Agency action or project that would affect any structure or feature over 45 years old that has not been evaluated, the buildings shall first be evaluated for eligibility for listing in the CRHR. The determination of eligibility shall be made by an expert who, at a minimum, meets the Secretary of the Interior's Professional Qualification Standards for Architectural History. This evaluation shall occur through the preparation of DPR 523 forms for each building and standard CEQA evaluation, and shall include consultation with the El Dorado County Historical Society.

DEPARTMENT OF TRANSPORTATION

DISTRICT 3
703 B STREET
P. O. BOX 911
MARYSVILLE, CA 95901-0911
PHONE (530) 741-5452
FAX (530) 741-4245
TTY 711



*Flex your power!
Be energy efficient!*

D

February 8, 2011

032010ELD0045
03-ED-50 P.M. 15.820 – 20.741
Placerville Redevelopment Plan Adoption
Draft Environmental Impact Report
SCH#: 2010102025

Mr. Cleve Morris, City Manager
City of Placerville
3101 Center Street
Placerville, CA 95667

RECEIVED
FEB 09 2011
CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

Dear Mr. Morris,

Thank you for the opportunity to review and provide comments on the draft Environmental Impact Report (DEIR) for the Placerville Redevelopment Plan Adoption. The project proposal entails the adoption of a Redevelopment Plan for a 1,077-acre Redevelopment Project area within the jurisdiction of the City of Placerville and adjacent El Dorado County unincorporated areas. The Plan includes the authorization for the use of redevelopment tools to remove blight within the project area over a 30-year period following adoption in mid-2011. The plan includes an area surrounding U. S. Highway 50 (US 50) and State Route 49 (SR 49). Our comments are as follows:

- The California Department of Transportation section of Chapter 6.10 on page 6.10-9 includes references to the 1998 US 50 Transportation Concept Report (TCR) and the ultimate facility identified in the SR 49 TCR.

The section should reference the current 2009 US 50 Corridor System Management Plan. (http://www.corridormobility.org/docManager/1000000474/US50_final_csmp_FINAL.pdf).

The 20 year concept for the segment of US 50 from Missouri Flat Road to freeway end in the City of Placerville is a 4-lane freeway with auxiliary lanes, for the segment from the end of freeway in the City of Placerville to Bedford Avenue is a 4-lane expressway, and for the segment from Bedford Avenue to Cedar Grove Exit is a 4-lane freeway with auxiliary lanes to Smith Flat and 4-lane expressway to Camino. The ultimate facility (Beyond 20-years) identified in the 2009 US 50 CSMP for the segment from Missouri Flat Road to the freeway end in the City of Placerville is a 4-lane freeway with auxiliary lanes, for the segment from the end of freeway in the City of Placerville to Bedford Avenue is a 4-lane expressway, and the segment from Bedford Avenue to Cedar Grove

"Caltrans improves mobility across California"

D-1

3. COMMENT AND RESPONSES

Mr. Cleve Morris
February 8, 2011
Page 2

Exit is a 4-lane freeway with auxiliary lanes.

The ultimate facility identified in the 2000 SR 49 TCR for the segment of SR 49 from Sacramento Street to the junction of SR 193 and 49 is a 2/4-lane expressway. Caltrans is currently updating the SR 49. TCR. The draft will be circulated to all cities, counties, regional transportation agencies and interested parties, including the City of Placerville and El Dorado County, for review and comment.

D-1

- The value of City and County planning collaboration is acknowledged in Goal A, Policy No.10 of the Placerville General Plan section included in Chapter 6.10 on page 6.10-11.

The report should include that the City of Placerville and El Dorado County will also collaborate with Caltrans.

D-2

The County and City should provide alternate transportation facilities to US 50 and SR 49 to ease existing and projected congestion due to traffic between Placerville and the commercial/industrial zones in El Dorado County, specifically the Missouri Flat Interchange area.

If you have any questions regarding these comments please contact me at (530) 741-5452 or kelly.eagan@dot.ca.gov.

Sincerely,



KELLY EAGAN
US 50 Corridor Manager

cc: State Clearinghouse

"Caltrans improves mobility across California"

COMMENT LETTER D

STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION, DISTRICT 3

February 8, 2011

Kelly Eagan
US 50 Corridor Manager

Response to Comment D-1

The Draft EIR is hereby updated to amend page 6.10-9, as follows:

REGULATORY CONTEXT

STATE

California Department of Transportation

Caltrans is responsible for planning, designing, building, operating, and maintaining the State Highway System (SHS). US-50 and SR-49, which traverse the Project Area, are part of the SHS maintained by Caltrans. The Project Area is located within Caltrans District 3, with offices in Marysville. Caltrans' Transportation Planning Division is responsible for developing statewide, long-range plans for transportation improvements, while the Transportation Programming Division sets priorities for various State and federal transportation funding programs.

~~The State Route 50 Transportation Concept Report (Caltrans 1998) identifies the 20-year concept (through 2018) for the corridor as a six-lane freeway with two general purpose lanes and one high-occupancy vehicle lane (HOV) lane in each direction from the county line to the future Silva Valley interchange. The ultimate facility concept (beyond 2018) for the corridor is an eight-lane freeway with three general purpose lanes and one HOV lane in each direction from the county line to west of Placerville. Through the City, the 20-year concept will add a third eastbound lane and provide other associated operational improvements such as right-turn lanes and extended left-turn pockets. Ultimately, this section of the corridor is identified as a four-lane expressway. East of Placerville, the concept and ultimate facility are proposed to remain the same as the current configuration due to topographical and environmental constraints except for the addition of passing lanes in some sections. Caltrans has established a concept LOS of E from the El Dorado County line to Ice House Road east of the Project Area.~~

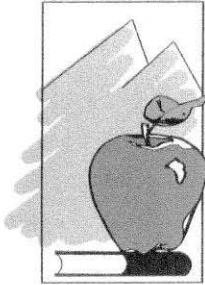
The Highway 50 2009 US 50 Corridor System Management Plan (CSMP) (Caltrans 2009) identifies the 20-year concept for the corridor. The 20-year concept for the segment of US 50 from Missouri Flat Road to freeway end in the City of Placerville envisions a 4-lane freeway with auxiliary lanes. The segment from the end of freeway in the City to Bedford Avenue is a 4-lane expressway, and the segment from Bedford Avenue to Cedar Grove Exit is a 4-lane freeway with auxiliary lanes to Smith Flat and a 4-lane expressway to Camino. The ultimate facility (beyond 20-years) identified in the 2009 US 50 CSMP for the segment from Missouri Flat Road to the freeway end in the City is a 4-lane freeway with auxiliary lanes. The segment to the end of freeway in the City to Bedford Avenue is a 4-lane expressway, and the segment from Bedford Avenue to Cedar Grove Exit is a 4-lane freeway with auxiliary lanes. Almost all US 50 segments are forecasted to operate under LOS -F- conditions in 20 years under the No-Build and Build scenarios.

The ~~Route~~ [Transportation](#) Concept Report ([TCR](#)), State Route 49 (Caltrans 2000) contains the 20-year improvement concept for SR-49. The ~~route concept~~ [TCR](#) recognizes the unique nature of SR-49 in terms of historical and topographic constraints, which preclude the possibility of significantly improving the highway on its existing alignment. ~~As such, SR 49 would remain a two-lane conventional highway through the County. Some improvements, such as widening to the Caltrans 40-foot pavement standard, are identified to achieve the full concept facility.~~ [The Ultimate Facility identified in the 2000 SR 49 TCR for the segment of SR-49 from Sacramento Street to the junction of SR-193/49 is a 2/4-lane expressway.](#) The concept LOS is F south of the community of El Dorado and through the City. Ultimately, some segments would require widening to four lanes or spot improvements (i.e., passing lanes or improvements for bicycle and pedestrian travel).

[Caltrans is currently updating the SR 49 TCR. The draft will be circulated to all cities, counties, regional transportation agencies and interested parties, including the City of Placerville and El Dorado County, for review and comment.](#)

Response to Comment D-2

The Redevelopment Plan must be consistent with the General Plan, and therefore there is no change to General Plan policies regarding agency coordination on transportation issues. Redevelopment may assist in the funding of future transportation improvements, but would not be the lead agency or the project proponent for such improvements, and would therefore have no authority over requiring the City and County to work with Caltrans. It is assumed that both will continue to collaborate with Caltrans, and will continue to explore future remedies for existing traffic congestion. As noted on page 6.10-17, the City's master plans have identified the transportation improvements necessary to accommodate cumulative traffic resulting from General Plan buildout. All cumulative traffic has been identified and the necessary traffic improvements to ensure the City maintains acceptable LOS have been identified as feasible, although funding has been identified as problematic. The Redevelopment Plan may provide funding assistance for the implementation of such projects where they are located in the Project Area.



E

El Dorado County Office of Education

Vicki L. Barber, Ed.D.
Superintendent

Terena Mendonca
Deputy Superintendent

Jeremy Meyers
Associate Superintendent

County Board of Education

Dolores Garcia
John Lane
Matt Boyer
Gene Rasmussen
Heidi Weiland

February 8, 2011

Redevelopment Agency
City of Placerville
3101 Center Street
Placerville, CA 95667

Attn: Cleve Morris, City Manager

RE: Proposed Placerville Redevelopment Agency

Dear Mr. Morris:

The El Dorado County Office of Education (the "COE") has reviewed the Draft Environmental Impact Report ("DEIR") for the Redevelopment Agency of the City of Placerville. The COE finds the information in the DEIR to be accurate with one minor exception. On page 6.8-8 the DEIR notes that the Project Area is served by three K-8 school districts. However, the Project Area is actually served by two K-8 school districts, one 9-12 school district, one community college district and a county office of education.

Based on the currently available information and projections, the COE believes that pass-through payments should be sufficient to mitigate the effects of the proposed Project Area on the COE. We look forward to working with the City of Placerville to ensure the timely and accurate transfer of these payments in the future.

The COE did not note any other discrepancies, and appreciates this opportunity to provide input for the final EIR.

Please don't hesitate to contact me with any questions.

530-622-7130
FAX 530-621-2543

e-mail: info@edcoe.org

6767 Green Valley Road
Placerville, CA 95667-8984

An Equal Opportunity Employer

Commitment to serving
our clients with Respect,
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Sincerely,

Terena Mendonca
Deputy Superintendent,
Administrative Services

RECEIVED

FEB 09 2011

CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.

E-1

COMMENT LETTER E

EL DORADO COUNTY OFFICE OF EDUCATION

February 8, 2011

Terena Mendonca

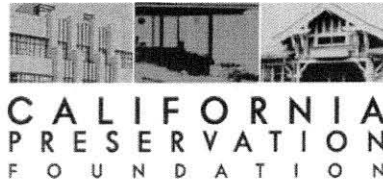
Deputy Superintendent, Administrative Services

Response to Comment E-1

Draft EIR page 6.8-8, paragraph two, is hereby amended as follows:

PUBLIC SCHOOLS

The Project Area is served by ~~three~~ two K-8 school districts, one 9-12 school district, one community college district and a county office of education. The Placerville Union School District and Mother Lode Union School District serve different portions of the project area. The El Dorado Union High School District, Los Rios Community College District, and El Dorado County Office of Education serve the entire Project Area.



F

February 9, 2011

Submitted Electronically

Redevelopment Agency
Attn: Cleve Morris, City Manager
City of Placerville
3101 Center Street
Placerville, California 95667



5 3RD STREET, SUITE 424
SAN FRANCISCO, CALIFORNIA
94103-3205

415.495.0349 PHONE
415.495.0265 FAX

CPF@CALIFORNIAPRESERVATION.ORG
WWW.CALIFORNIAPRESERVATION.ORG

RE: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PLACERVILLE REDEVELOPMENT PLAN

Dear Redevelopment Agency,

On behalf of California Preservation Foundation (CPF), thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Placerville Redevelopment Plan (Plan). CPF has concerns and questions regarding the overall use of the Program EIR.

CPF Interests

CPF is the only statewide nonprofit organization dedicated to the preservation of California's diverse cultural and architectural heritage. Established in 1977, CPF works with its extensive network of 1,500 members to provide statewide leadership, advocacy and education to ensure the protection of California's diverse cultural heritage and historic places.

Additional Environmental Review May Be Required for Individual Projects Carried Out Under the Redevelopment Plan

Though not indicated in the document title, page 2 of the Introduction states that this DEIR is a Program EIR. As such, when individual activities within the program are proposed, the lead agency is required to examine the individual activities to determine whether their effects were fully analyzed in the Program EIR. (Guideline § 15128(c)) It is our understanding that, according to the Plan, before any redevelopment action is taken that would affect a building or structure that is 45 years or older, the Redevelopment Agency would evaluate the resource for eligibility for listing in the California Register of Historical Resources (California Register). This determination of eligibility should be made by an expert who, at a minimum, meets the Secretary of the Interior's Professional Qualification Standards for Architectural History. According to the DEIR Mitigation 6.4-3b, if the property is eligible for listing, then "the Agency shall make the rehabilitation and reuse of the building or structure

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EXECUTIVE DIRECTOR
Cindy L. Heitzman

F-1

its priority" and follow the Secretary of the Interior's Standards for the Treatment of Historic Properties.

The DEIR further acknowledges that in instances where a project proposes resources be demolished or altered, the action, "would be subject to further project-specific environmental review." (DEIR Page 6.4-20) The environmental review for these projects would include project alternatives, one of which should be a preservation alternative, as well as additional project specific mitigation measures. While the programmatic EIR can be used in approving an activity that is within the scope of the overall work program, this would only be allowed if no new effects could occur or no new mitigation measures would be required. (Guideline § 15128) If an individual project proposes actions that would impair the eligibility of a historic resource for the California Register, a Subsequent EIR is required because significant impacts would occur and additional mitigation measures would be required.

F-1

Significant and Unavoidable Cumulative Impact is Erroneous

Impact 6.4-4 of the DEIR states that the work program will result in significant and unavoidable cumulative impacts on cultural resources. This is disconcerting since the project description in the DEIR for specific redevelopment actions have not been developed or stated beyond general terms such as "rehabilitation of property" or "demolition of property". CEQA Guidelines 15130(b)1 states that either of the following should be included in a discussion of cumulative impact analysis.

(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or

(B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

F-2

At this time, the cumulative impact discussion in the DEIR, does not adequately describe the projects or their specific locations that would be a part of the redevelopment plan. The EIR jumps to the conclusion that "it is not always feasible to protect these resources, particularly when preservation in place would frustrate implementation of projects, and for this reason, the cumulative effects of the redevelopment activities and other projects in the City and County would be significant." (DEIR Page 6.4-20) It is impossible to determine when preservation of a resource is not "feasible" and would cause a significant, unavoidable impact without knowing the scope and location of specific projects.

Individual Project EIRs Should Include Potentially Feasible Preservation Alternatives

CEQA reflects the statewide policy that projects with significant environmental impacts, including impacts to the State's historic environment, should not be approved "if there are feasible alternatives ... available which would substantially

F-3

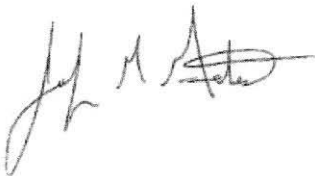
lessen the significant environmental effects ..." (Pub. Resources Code § 21002.) CEQA thus requires that alternatives be adopted that would "feasibly obtain most of the basic objectives of the project." (Guideline § 15126.6 subd.(a).) "Feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code § 21061.1.) Findings supporting the infeasibility of an alternative must be supported by "substantial evidence" based on an independent analysis by the lead agency. (Pub. Resources Code § 21081.5; Preservation Action Council, *supra*, 141 Cal. App.4th 1336.)

F-3

Any proposed project being undertaken through the Redevelopment Plan that would demolish an historic resource has a significant effect on the environment, requiring a lead agency to study and adopt feasible alternatives such as rehabilitation, if available and practical. (Pub. Resources Code § 21081; 21084.1.) CEQA's requirements to identify and analyze feasible project alternatives in an EIR are of great importance when projects threaten historic resources, as is its substantive mandate that demolition not be allowed if there is indeed a feasible alternative.

Thank you for the opportunity to comment on this project. Please feel free to contact me at (415) 495-0349 if you have any questions or concerns.

Sincerely,



Jennifer M. Gates, AICP
Field Services Director
In partnership with the National Trust for Historic Preservation

cc: Cleve Morris, City Manager, City of Placerville
Wayne Donaldson, State Historic Preservation Officer, Office of Historic Preservation
Elaine Stiles, Program Officer, Western Office National Trust for Historic Preservation

COMMENT LETTER F

CALIFORNIA PRESERVATION FOUNDATION

February 9, 2011

Jennifer M. Gates, AICP

Field Services Director

In partnership with the National Trust for Historic Preservation

Response to Comment F-1

Please see Response to Comment C-1, above. Mitigation Measure 6.4-3a has been amended to require that the determination of eligibility shall be made by an expert who, at a minimum, meets the Secretary of the Interior's Professional Qualification Standards for Architectural History.

The commenter's understanding is correct. Mitigation Measure 6.4-3 specifically refers to actions that may rehabilitate and alter a historic structure, such as an adaptive reuse project, but do not remove character defining features of an eligible resource which would cause the structure to no longer be eligible for listing in the California Register of Historic Resources (CRHR). Any redevelopment actions that propose the demolition or significantly adverse alteration of a historic structure would require a project-specific EIR to consider alternatives to such an action and mitigation measures to reduce impacts to less-than-significant levels.

Response to Comment F-2

Please see Response to Comment F-1, above. Precisely because the EIR cannot identify all the potential redevelopment actions at this time, and cannot ensure that all resources will be protected through adopted mitigation measures, the cumulative impacts may be significant. As noted on Draft EIR page 6.4-20, because all archaeological or historic resources are unique and non-renewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. To clarify that this is a potential impact that may occur over the life of the redevelopment plan, the Draft EIR, page 6.4-20, has been amended as follows:

Impact 6.4-4 Redevelopment projects and redevelopment-engendered development could contribute to the cumulative degradation or loss of paleontological, archaeological, or historic resources, including human remains. This would be a potentially cumulatively considerable.

Based upon previous cultural resource surveys and research, the area that comprises the City and its vicinity has been inhabited by prehistoric peoples for thousands of years, and by historic peoples since the 1800s. Redevelopment activities and projects, in combination with other development in the City and County, could contribute to the loss of significant archaeological or historic resources. Because all archaeological or historic resources are unique and non-renewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. The loss of any one archaeological site affects all others in a region because these resources are best understood in the context of the entirety of the cultural system of which they are a part.

The boundaries of an archaeologically or historically important site extend beyond any project site boundaries. As a result, a meaningful approach to preserving and managing cultural resources must focus on the likely distribution of cultural resources, rather than on project or parcel boundaries. The cultural system is represented archaeologically by the

total inventory of all sites and other cultural remains in the region. Proper planning and appropriate mitigation can help to capture and preserve knowledge of such resources and can provide opportunities for increasing our understanding of the past environmental conditions and cultures by recording data about sites discovered and preserving artifacts found. Federal, state, and local laws are also in place, as discussed above, that protect these resources in most instances. Even so, it is not always feasible to protect these resources, particularly when preservation in place would frustrate implementation of projects, and for this reason, the cumulative effects of the redevelopment activities and other projects in the City and County would be significant. Moreover, because redevelopment activities and projects in the Project Area have the potential to adversely affect significant archaeological resources that are unique and non-renewable members of finite classes, the incremental contribution to these cumulative effects would itself be potentially cumulatively considerable. As discussed above, damage or destruction of some archaeological, paleontological or historic resources in the Project Area may be mitigated on a project-by-project basis. However, any loss of cultural resources associated with redevelopment projects would contribute to a region-wide impact that cannot be remedied. **Therefore** Whereas it is unknown at this time whether all future redevelopment projects can mitigate or avoid the loss of cultural resources, this is considered a **potentially significant impact**.

Mitigation

None available beyond those identified for project-specific mitigation.

Significance after Mitigation

Project-specific mitigation measures would reduce the magnitude of potential cumulative impacts to historic resources, but not to less-than-cumulatively considerable levels. It is unknown at this time whether all future redevelopment projects can mitigate or avoid the loss of cultural resources, thus this impact remains **potentially significant and unavoidable**.

Response to Comment F-3

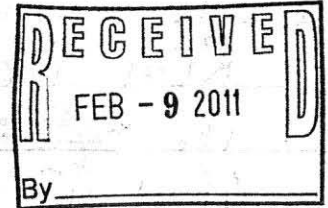
The commenter has a correct understanding of the CEQA process. This Program EIR does not provide review of any future redevelopment projects that would involve the loss of character-defining features or demolition of a historic structure, and additional environmental review would be required for any such projects. Please see Response to Comment F-1, above.

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CLEVE MORRIS
 CITY MANAGER / EX. DIRECTOR RDA
 REDEVELOPMENT AGENCY OF THE CITY OF PLACERVILLE
 CITY HALL
 3101 CENTER STREET, PLACERVILLE, CA 95667

G

RE: DRAFT EIR



DEAR MR. MORRIS:

THE FOLLOWING ARE A FEW ISSUES
 THAT I HAVE WITH THE DRAFT EIR.

IT IS POSSIBLE THAT THESE ISSUES
 WERE STUDIED, AND THAT I OVERLOOKED
 THEM, GIVEN THE MASSIVE VOLUME OF
 THIS TOME.

① REDEVELOPMENT CONSTRUCTION MAY
 DISTURB & UNCOVER OLD MINING ACTIVITIES,
 THEREBY RELEASING MERCURY & OTHER
 CONTAMINATES.

G-1

② REDEVELOPMENT WILL INCREASE DEMAND
 FOR PUBLIC SERVICES, WHILE SIGNIFICANTLY
 REDUCING ACCESS TO FUTURE TAX REVENUES
 BY FIRE, POLICE, SCHOOLS, ETC.

G-2

③ URBAN IS DEFINED BY A DENSITY OF 1,000 PEOPLE/SQ MI, BY THE US CENSUS BUREAU. NOT THE 100 PEOPLE/SQ MI STATED IN SECTION 6.8-1

THE DENSITY OF POPULATION IN THIS RDA PROJECT AREA IS: 1.158 PERSONS PER ~~SQ MI~~ ^{ACRE}. FAR SHORT OF 1K/MI². WITH 930 PEOPLE AFFECTED IN THIS P.A. IT EQUATES TO A DENSITY OF 576.4 PERSONS PER SQ MI.

G-3

④ MAPS FOR THE DISCOVERED "PRIVATE" SEWER LINES HAVE NOT BEEN GENERATED YET. THESE MUST BE STUDIED UNDER THE EIR BEFORE ADOPTING IT.

G-4

⑤ A MAJORITY OF NOTED "PHYSICAL BLIGHT" WAS MINOR IN NATURE. MISSING ROOF SHINGLES, TIN ROOFING, CRACKED STUCCO, ETC.

G-5

- ⑥ SEPTIC SYSTEMS IN THE MOTOR CITY AREA & THROUGHOUT THE P.A. ARE STATED AS "ALL OF THESE CONDITIONS ARE BEING STUDIED & WILL BE DISCUSSED IN MORE DETAIL IN THE REPORT TO THE CITY COUNCIL. THEY & THE PRIVATE SEWER LINES NEED TO BE ADDRESSED IN THE EIR."

G-6

THANK YOU,
MICHAEL DROBESHA

COMMENT LETTER G

Received February 9, 2011

Michael Drobesh

Response to Comment G-1

No known mining sources of contamination have been identified in the proposed Project Area, based on a review of federal, state, and local regulatory agency files. Although not specifically identified as a source of potential contamination, Chapter 6.5, Hazards and Hazardous Materials, Impact 6.5-1, notes that historical uses of a property may be masked by the present uses of a site, and therefore investigation of site-specific parcels is necessary. Mitigation Measure 6.5-1 requires a thorough examination of past property uses, and establishes construction protocols to ensure the inadvertent discoveries of past contamination during construction are managed appropriate to clean the site and protect workers and subsequent site users.

Response to Comment G-2

Draft EIR Subchapter 6.7 analyzed the potential effects on fire services, public safety, and schools that may occur as a result of redevelopment activities and future development engendered by redevelopment. Redevelopment would remove barriers to planned development within the Project Area, which would generate demands on public services consistent with the adopted City General Plan.

Redevelopment tools would allow for private assistance and public improvements to eliminate existing blight and structural deficiencies that lead to higher fire risks, public safety demands, and other health and safety problems. Redevelopment may assist with the construction of fire facilities, in the construction of water conveyance infrastructure to improve fire flows, assist with the construction of police facilities for the benefit of the Project Area, and assist in the construction of street lighting and other utilities that improve public safety. As discussed on Draft EIR page 6.8-13, the school districts reported that their facilities are adequate to accommodate anticipated future students within the Project Area.

As described on Draft EIR page 6.8-10, the EIR does not discuss the fiscal effects of the proposed Redevelopment Plan. CEQA does not require an evaluation of economic or social effects unless they are related to a physical change. As described in Draft EIR Chapter 3.0, Project Description, adoption of the proposed Redevelopment Plan will authorize the Agency to finance improvements and programs through tax increment financing in the Project Area. Tax increment financing reallocates a portion of the future growth in property tax revenue to the Agency instead of other taxing entities. To mitigate any potential fiscal burden or detriment on those taxing entities, the California Community Redevelopment Law (CRL) requires the Agency to make certain mandatory payments to the taxing entities throughout the life of the Redevelopment Plan and for as long as the Agency receives tax increment revenues. In enacting the mandatory payment requirement, the Legislature declared that a redevelopment agency shall not be required, as a measure to mitigate a significant environmental effect or otherwise, to make any other payments to, or pay for any facilities that will be owned by, an affected taxing entity (CRL Section 33607.5(f)).

The fiscal effects of the proposed Redevelopment Plan is evaluated in two separate reports that have been prepared by the Agency as part of the process leading to adoption of the proposed Redevelopment Plan. The first report is a Preliminary Report to the Affected Taxing Entities pursuant to CRL Section 33344.5. The Preliminary Report was transmitted

to the affected taxing entities on January 12, 2011, and the Agency has been consulting with each affected taxing entity concerning the financial and other effects of the Redevelopment Plan as provided in CRL Section 33328. The second report is a Report to the City Council pursuant to CRL Section 33352. The Report to the City Council, which incorporates this EIR by reference, serves as the major evidentiary document supporting the proposed adoption of the Redevelopment Plan. The Report to the City Council was adopted on March 8, 2011 and has been made available for public review, and a joint public hearing of the Agency and City Council to consider the proposed Redevelopment Plan has been scheduled for April 12, 2011.

Response to Comment G-3

The commenter is correct – this was a typographical error, and we have added further clarification. The statement on Draft EIR page 6.8-11, third paragraph, second sentence should read:

~~Urban~~ is defined as a minimum density of ~~400~~ 1,000 persons per square mile; most of the Project Area is considered an urban area ~~under these criteria as defined by the United States Census Bureau.~~

Response to Comment G-4

~~Private sewer lines~~ refers to a shared private connection between multiple older properties in the City and the City sewer system, rather than a lateral line. The property owners receive service from the City sewer system, and are responsible for maintaining the line. The City has recently inventoried all the private systems they were aware of. They identified 68 private lines collectively serving 255 parcels scattered throughout the City, mostly in the historic district. Ten of these appear to be within the Project Area. Where property owners are unaware of the multiple connections and cumulative flow requirements to the City sewer main, health and safety issues are known to occur when private lines become blocked but are continued to be used. As with septic systems, the property owners are responsible for maintenance costs. Aging and failing private lines place a burden on the community due to the high cost of replacing the system with individual lateral connections and mitigating sewage spill health and safety impacts. Redevelopment would provide the resources necessary to assist property owners in replacing failed lines with separate laterals, and mitigating sewage spills. This would be a beneficial impact. As replacement laterals are designed and implemented, such projects will require site-specific environmental review to assess and address potential construction impacts, as with all other public infrastructure activities discussed in the Draft EIR.

Response to Comment G-5

Physical blight is addressed in the draft Preliminary Report, which determined that the Project Area was experiencing significant blight as defined by CRL. The Draft EIR does not make blight findings, but describes current conditions and analyzes the potential environmental effects of redevelopment activities that may be implemented over the life of the proposed Redevelopment Plan.

Response to Comment G-6

Most buildings in the unincorporated Motor City portion of the Project Area are on septic systems and are not connected to a sewer system. According to Fred Sanford at the El Dorado County Environmental Health Department, the area has old septic systems that fail occasionally due to wear and tear. When a septic system fails, it is similar to a sewage spill;

3. COMMENT AND RESPONSES

however, it is contained on the property. The spill typically covers a ten foot area, then soaks back into the ground (unless it is raining, in which case it remains above ground until it stops raining). When a failure is reported, the County will conduct an inspection and issue a permit to fix the problem. The property will be connected to the sewer system if a sewer line is within 200 feet of the property, or it will have a new septic system installed. The property owner is responsible for the cost.

Aging and failing septic systems place a burden on the community due to the high cost of replacing the system or connecting to the sewer system. Redevelopment would provide the resources necessary to connect Motor City residents to the City's sewer system and mitigate sewage spills. This would be a beneficial impact. As sewer lines are designed and proposed for extension to the Motor City area, such projects will require site-specific environmental review to assess and address construction impacts, as with all other public infrastructure activities discussed in the Draft EIR.

Sharlene S. McCaslin

2902 Norman Street
Placerville, CA 95667
530-622-1043
916-804-4435
sharlene.mccaslin@sbcglobal.net

February 9, 2011

City of Placerville
1301 Center Street
Placerville, CA 95667



Re: Comments on City of Placerville Redevelopment Agency Draft Environmental Impact Report

2.0 SUMMARY OF IMPACTS AND MITIGATION

The Project Description Summary on pages 2.0-1 and 2.0-2 states **“The proposed project is the adoption and implementation of the Placerville Redevelopment Plan, which would authorize the use of redevelopment tools to remove blight within the Project Area over a 30 year period...**

“The Redevelopment Plan is a “programmatic” document – rather than a site-specific document – which **“empowers the Redevelopment Agency of the City of Placerville (Agency) to implement a variety of tools to revitalize the Project Area...”**

H-1

A programmatic document, by its very nature, is vague, and its broad-scope analysis then becomes the basis for tiering. Programmatic documents should be concise and clear and provide vision and goals for the next level of decision making, and they should clearly state the life expectancy of the document. Programmatic documents should clarify what the purpose of the first tier documents is in relationship to subsequent levels of analyses and documentation. This EIR does not contain enough information to proceed with the Redevelopment Plan and therefore, should be rejected.

On page 2.0-2 of the DEIR it states, **“Specific actions would be implemented gradually over the duration of the Redevelopment Plan...”** and **“Such specific actions may require additional environmental analysis at a future date.”** The DEIR doesn’t indicate what the specific actions are, what would trigger additional environmental analysis, or when the future date may be.

H-2

The California Environmental Quality Act (CEQA) was created so that governmental agencies give “major consideration to preventing environmental damage when regulating activities

H-3

3. COMMENT AND RESPONSES

affecting the quality of the environment.” Putting off to some future date to determine what the impacts might be as the result of a project is in violation of CEQA.

Reliance on programmatic documents results in public concern that programmatic documents are a “shell game” of when and where deferred issues will be addressed, which only serves to undermine the Agency’s credibility and public trust.

H-3

Please explain the relationship between the programmatic analysis and document and future analyses and documents; also describe how the public will be involved, and how and where potential issues will be addressed.

Page 2.0-2 and 2.0-3. SUMMARY OF ALTERNATIVES TO THE PROPOSED PROJECT
“The proposed project was determined to be the Environmentally Superior Alternative.”
“... development of the Project Area would occur as currently defined in the City General Plan...**at a pace commensurate with prevailing market conditions...**”

“*Environmentally Superior*” would imply that this project would have the least impact on the environment, yet the proposed project has significant and unavoidable impacts that would be completely eliminated with the No Project alternative.

The prudent approach is for development to occur that is in step with the current dire and uncertain economic environment; to do otherwise would be risky and irresponsible. If tax increments were not going to the Agency they could be used on a “pay as you go” basis as funds become available. Under the No Project Alternative the City would not be burdened with more bonded indebtedness or consultant and administrative fees. Under the No Project Alternative City staff would be freed up to perform other duties, such as code enforcement as an alternative means to eliminate blight. Under the No Project Alternative we would not be affected by the Governor’s threat to eliminate redevelopment agencies and to raid funds from the Agency, because the Agency would have no funds subject to being diverted.

H-4

“Redevelopment plans are unique in that they are specifically designed to mitigate condition of blight where other tools available to local jurisdictions have failed.”

I must strongly disagree with the above statement because I don’t believe “*other tools available to local jurisdictions have failed*,” because the local jurisdictions haven’t tried to “*mitigate condition of blight*.” Nobody knew we had blight until the redevelopment consultants did their windshield survey and identified “blight,” which we thought was just the unique character of Placerville.

Also on page 2.0-3 AREAS OF CONTROVERSY

“... no known areas of controversy...”

Members of the community have voiced their vigorous opposition to redevelopment, specifically concerning the use of eminent domain as a “tool” to take private property from one individual and transfer it to another. The Agency’s goals include the use of eminent domain

H-5

except in the case of properties "occupied as a residence;" however, there are so many exceptions to Proposition 99 as to afford virtually no protection whatsoever.

California Health and Safety Laws clearly establish that it is not sufficient to merely show that the area is not being put to its optimum use, or that the land is more valuable for other uses. [18 Cal.3d 278] While rejecting constitutional attacks on CRL, the court in Redevelopment Agency v. Hayes (1954) 122 Cal.App.2d 777, 793 [266 P.2d 105], recognized "[o]ne man's land cannot be seized by the Government and sold to another man merely in order that the purchaser may build upon it a better house or a house which better meets the Government's idea of what is appropriate or well designed." The court stressed: "Public agencies and courts both should be chary of the use of the act unless, as here, there is a situation where the blight is such that it constitutes a real hindrance to the development of the city and cannot be eliminated or improved without public assistance. It never can be used just because the public agency considers that it can make a better use or planning of an area than its present use or plan." (122 Cal.App.2d at p. 812.)

H-5

Another major area of concern is the lack of adequate protection of historic resources. Even with the adoption of "preservation goals," the wording is so narrowly crafted that it does not offer the level of protection necessary to preserve historic resources, particularly locally designated structures, objects and sites.

H-6

In addition, the community has just barely recovered from years of construction projects that have affected businesses and interfered with the public's desire for a quiet community, especially the night-time environment, when most of the construction will occur.

H-7

3.0 PROJECT DESCRIPTION

The Project Location on page 3.0-1 states, "**The County portion of Project Area includes 267 acres (24.8%) and the City portion of the Project Area includes 810 acres (75.2%).**"

Redevelopment Law requires that 80% of the Project Area must be urbanized. The Smith Flat and Motor City areas are primarily undeveloped; in fact large areas of land in the Smith Flat and Motor City areas had to be eliminated from the original Project Area because it exceeded the 20% limit for non-urbanized property. There are also large lots of undeveloped land in the Placerville Drive/Ray Lawyer Drive area. Clearly the RDA's intent is to *develop*, not *redevelop*, and the goal is to reap new property and sales tax dollars, not to eliminate blight. Making up blight in order to obtain the tax revenue is a violation of Health and Safety regulations.

H-8

33320.1. (a) (2) **Parcels that are not blighted shall not be included in the project area for the purpose of obtaining the allocation of taxes from the area pursuant to Section 33670 without other substantial justification for their inclusion.**

Why is nearly one quarter of the Project Area comprised of unincorporated County properties?

3. COMMENT AND RESPONSES

Under Blighting Conditions in the Project Area, page 3.0-4, the DEIR states, **“Redevelopment is being considered as a tool to assist the City in addressing the needs in the older developed portions of the community. Establishment of the Project Area is being proposed to alleviate physical and economic blight.”**

H-8

This statement appears to be in direct conflict with the inclusion of vacant unincorporated land in the Project Area.

Page 3.0-5, **“A field survey was undertaken to evaluate the condition of structures and parcels, document the occurrence of vacant buildings, locate underutilized parcels, and locate inadequately sized lots in the Project Area. The focus was to identify conditions that pose a health and safety threat to occupants or visitors.”**

Why would vacant buildings, underutilized parcels, and inadequately sized lots “pose a health and safety threat to occupants or visitors?”

The EIR goes on to state, **“Generally, as economic conditions decline there is a corresponding lack of investment in physical maintenance of properties, which further perpetuates physical blight. The presence of these conditions reflect a lack of investment by property owners in maintaining their properties in a condition that assures the safety of persons who live and work in the area. Physical blighting condition propagate further decline of an area and deter economic development activities by private investors.”**

One could argue that a decline in economic conditions and economic development could be the result of an on-going recession. In fact, if you look at the January 12, 2010, Feasibility Study for a Potential Redevelopment Plan by Fraser and Associates, pages 13 and 14, you will notice that the following properties, among others, were identified as Notable Vacancies:

H-9

Market and Deli on upper Broadway at Newtown Road
AHA Gifts on Lower Main at Forni Road
Harold Motors on Forni Road at Highway 50

Page 3.0-5, states, **“A blighted area is one that necessitates the creation of a redevelopment project area because the combination of conditions in the area constitute a burden on the community and cannot reasonably be expected to be alleviated by private enterprise or governmental action or both.”**

Within less than a year, without the assistance of redevelopment, there are thriving businesses in the once vacant “blighted” properties.



Sierra Wildlife Rescue is now operating out of the building that previously housed a Market and Deli on upper Broadway at Newtown Road.

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Hog Wild Bar-B-Q now occupies the property that was previously A-HA Gifts on Lower Main.

Harold Motors on Forni Road at Highway 50 is no longer vacant. The building is home to a new Thompson's Toyota with a number of tenants in the office spaces.

On page 3.0-6 of the EIR, Project Objectives, includes: **“to eliminate the conditions of blight existing in the Project Area... and to prevent the recurrence of blighting conditions...”** The Agency proposes to provide for the **“planning, development, re-planning, redesign, redevelopment, reconstruction and rehabilitation.”**

Isn't it the business of the City to provide the above services? The City has a Community Development Department, a Public Works Department, Building and Planning Departments and a Planning Commission. Will these City entities now work for the Redevelopment Agency?

Is the Redevelopment Agency going to take responsibility for the City's business because it is also going to reallocate the property taxes through Tax Incremental Financing that were meant to fund the City's business?

Redevelopment Project Components, page 3.0-7, identifies **“projects and programs that will achieve the Agency's redevelopment and economic development goals and eliminate blight in the Project Area.”**

Some of the projects and programs the RDA proposes to eliminate blight and protect the health and safety of residents and visitors include public facilities and infrastructure improvements. The following projects are proposed for the Historic Main Street area:

- Conversion of the bell tower area to a public plaza
- Widening of the pedestrian walkways
- Adding planting areas and accent planters
- New signs, benches and street furniture
- Outdoor dining areas
- Traffic roundabout

How are these projects going to eliminate blight and protect the health and safety of residents and visitors? These projects are already planned to be implemented over a period of time and do not warrant the diversion of public monies to prioritize them in light of the current harsh economic environment!

Projects proposed for the Broadway to Smith Flat Road area include:

- Improved non-motorized transportation facilities, landscape, streetscape and transit facilities (no details on how this will be accomplished)
- Improved land use
- Intersection improvements and improved access to businesses along Broadway

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- Unidentified safety, access and mobility improvements for pedestrians, bicyclists and vehicular traffic

Again - how are these projects going to eliminate blight and protect the health and safety of residents and visitors?

These projects are already planned to be implemented over a period of time and do not warrant the diversion of public monies to prioritize them in light of the current harsh economic environment! Blight designations and redevelopment were originally created to help clean up slum areas. None of these proposed projects even comes close to the original intent.

Projects proposed for the Placerville Drive area include:

- Change Placerville Drive into a “destination/downscaled” roadway with landscaped median, controlled left-turn lanes, sidewalks, bike lanes and room for transit service needs.
- Widen Hangtown Creek Bridge to 4-lanes but only utilize 2 lanes
- Streetscape beautification, sidewalks and bike lanes
- Build the Highway 50/Forni Road/Placerville Drive Interchange
- Between Ray Lawyer Drive and Cold Springs Road, construct a wider than required 2-lane cross-section plus bike lanes and medians that is “convertible” to a 4-lane cross-section plus bike lanes and medians. The conversion is slated to occur if and when necessary as dictated by traffic volumes. Improvements elsewhere in the corridor may provide alternate opportunities for regional travel.

H-9

Once more - how are these projects going to eliminate blight and protect the health and safety of residents and visitors?

These projects are already planned to be implemented over a period of time and do not warrant the diversion of public monies to prioritize them in the current harsh economic environment! These are public works projects, intended to be undertaken over time. To build out all these road projects would only cause traffic intensification and encourage additional development.

Other City programs and projects throughout the Redevelopment Project Area include:

- Storm Water Management Plan – June 2005
- City of Placerville Water Master Plan – December 2005
- City of Placerville Sewer System Master Plan – July 2006
- Hangtown Creek Master Plan – January 2007
- Structure Improvements including roadways, landscape, street lights, decorative and handicapped accessible crosswalks and intersections, transit improvements, interchanges, curbs, gutters, sidewalks, bridges, parking, traffic signals, bicycle paths,

streetscape improvements, street medians, street furniture, utility undergrounding and trails.

- **Water, sewer and drainage improvement projects: upgraded sewer and drainage systems, new and replaced sewer and drainage pipelines, sewer parallels, monitoring systems, wastewater and sewer pump and treatment facilities, flood control systems, improved water storage and distribution facilities, and improved pressure control equipment.**
- Community Facilities Program -fire stations, police stations, parks, community centers, libraries, and cultural facilities.
- **Targeted Business Recruitment Program – create incentives for the recruitment of specific types of businesses including land acquisition, land cost write-downs, and low-interest loans for commercial rehabilitation, infrastructure improvements, a faster and more flexible permitting process, or other authorized activities**
- Downtown Revitalization Program
- Business Revitalization Program
- Assist the business associations for Placerville Drive, Main Street, and Broadway with marketing, beautification, special events, business recruitment and outreach, and other eligible activities.
- Environmental Remediation and Brownfields Revitalization
- Affordable Housing

How are these projects going to eliminate blight and protect the health and safety of residents and visitors? Water and sewer improvements/repairs/maintenance, storm water management and Hangtown Creek maintenance are Public Works projects. Residents and ratepayers expect the City to manage its budget and not create more debt during a recession, just as all the rest of us are expected to do. We would be happy if the streets were maintained; we don't need landscaping, decorative intersections or street furniture. We can't afford those luxuries! Community residents can't afford to keep their own landscaping watered and green; why would it be okay for the City to use our money to water public landscaping?

H-9

Incentive programs to recruit businesses to Placerville is just another way of saying we will subsidize chain stores that will undermine the survival of independent businesses. If these national chains felt there was a viable market in Placerville for their goods or services you can be sure they would already be here. They know how to do market research. Just look at the recent Starbuck's and Togo's situation - they moved into town and then moved back out when they didn't bring in the expected revenue. What might be adequate income for a small family-owned business just won't cut it for a chain store when you consider the corporate operations that must be supported. When you spend a dollar at a local store, you are supporting not only that business, but all of these other jobs and businesses in the community. That is not the case with a chain store.

Stacy Mitchell, author of The Big Box Swindle, states it like this: "One way the market is distorted is that mega-retailers routinely use their market power to undermine their rivals.

They win not by being better competitors, but by using their size and power to gain an unfair advantage. They pressure suppliers to give them special deals that are not available to independents. They often build far more square footage of retail space in a community than the spending power of local consumers can support. They do this because they know that by flooding a market with excess retail capacity, it is a lot easier to capsize independent retailers. No matter how well-run or popular, independents often lack the deep financial resources to withstand a sustained attack by a global corporation.

“Consider what happens if Blockbuster Video locates a new store across the street from an established independent video store, in a neighborhood that only has enough spending on movie rentals to support one video store. Blockbuster doesn't have to be the more popular of those two stores. All it has to do is to skim off just enough of the independent's revenue to put it in the red. Blockbuster has the financial wherewithal to operate at a loss and to hang on for as long as it takes. The independent can't do that, so the independent ends up closing—even though it was the more popular of the two stores.”

The public must not be expected to fund private development. You cannot create more consumer spending just by building a new store. We only have so many dollars in our wallets.

Page 3.0-7 Public Facilities and Infrastructure Improvements

None of the plans identified for proposed redevelopment projects has anything to do with eliminating blight or addressing health and safety issues. In fact some projects directly conflict with others where road improvements take away parking. Road improvements and beautification projects should not take priority over police and fire protection, education and other general fund expenditures. The list of traffic/circulation projects includes interchanges and trails as if they were comparable projects.

H-9

Page 3.0-10 Community Facilities Program - Commercial Development and Economic Revitalization Activities – Public/Private Development Program

“...help facilitate private investment.”

“...the Agency could assemble small, underutilized, and/or poorly configured parcels into sites **suitable for new development...**”

Using eminent domain to take private property to give to another person is called stealing. Eliminating blight and protecting health and safety cannot be fixed by new development.

Page 3.0-10 Commercial Development and Economic Revitalization Activities

“These projects and programs seek to complement the Agency's goals for urban revitalization by supporting economic development activities to retain, expand, and attract businesses in the Project Area. As documented in the Preliminary Report, Project Area properties suffer from depreciating property values. In addition, several of these commercial development and economic revitalization activities can remove many of the physical blighting conditions documented by partnering with property owners, tenants,

and business owners to not only implement economic development activities, but also make physical improvements to properties and buildings.”

What happened to eliminating blight and protecting the health and safety of residents and visitors? Aren't property owners responsible for the maintenance of their own properties? The public shouldn't be expected to pay for upgrades to private properties. There are other low cost methods of financing available to do maintenance and upgrades, including creating assessment districts.

Page 3.0-10 Public/Private Development Program

“... the Agency participates in significant private development projects...or land assembly to assist with new development or the expansion of existing development.”

“In certain circumstances, the Agency could assemble small, underutilized, and/or poorly configured parcels into sites suitable for new development, and thereafter sell and/or lease property for private development.”

“Land assembly would likely take place in response to property owner or developer initiated efforts to assemble the property needed for the expansion of existing uses or for the creation of sites capable of development for new uses.”

Cities should not be in the business of buying, selling and developing land; they should be managing the City. If the Redevelopment Agency members wish to invest in property, sell, lease or develop land, they should enter that field and use their own money to do so. The RDA should not be using public funds for Developer Welfare or trying to manipulate the market.

Page 3.0-14 Implementation Plan

The Implementation Plan, which is a different document and is separate from the DEIR and the Redevelopment Preliminary Report. The Implementation Plan is required to contain the specific goals and objectives, potential projects, estimated expenditures and an explanation of how the goals and objectives, programs, and expenditures will eliminate blight.

The Implementation Plan also will contain a description of the Housing component which shows how the Plan's goals and objectives for housing improvement, preservation, and production will be implemented, as well as how the statutory requirements for the set-aside and expenditure of tax increment for housing purposes will be met.

An Implementation Plan will be prepared as a component of the Agency's Report to City Council on the proposed Redevelopment Plan adoption. By state law, the Implementation Plan is not subject to environmental review. Identified projects and programs are assessed as they are proposed for actual design and implementation.

The DEIR is a programmatic document and therefore, does not contain details upon which to accurately determine whether or not redevelopment will result in impacts, and the implementation plan contains specific details of how redevelopment will occur, but is not is not

H-9

H-10

subject to environmental review. This is a really neat trick to avoid an accurate evaluation of the expected impacts.

H-10

Page 4.0-1 Alternatives

“An EIR must evaluate a **reasonable range** of alternatives...The range of alternatives required in an EIR is governed by a ‘**rule of reason**’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice...”

Page 4.0-2 Project Objectives

“The purpose and objectives of the Redevelopment Plan are to **eliminate the conditions of blight** existing in the project area...” The Redevelopment Plan will achieve the purposes of the CRL by:

“...The attainment of an environment reflecting a high level of concern for architectural, landscape, and urban design principles”

How, exactly will a “high level of concern for architectural, landscape, and urban design principles” eliminate blight and protect health and safety?

Page 4.0-4 Cumulative Significant and Unavoidable Impacts

“Impact 6.4-4 **Redevelopment projects and redevelopment-engendered development could contribute to the cumulative degradation or loss of paleontological, archaeological, or historic resources, including human remains. This would be cumulatively considerable.**”

It seems fairly obvious that *30 years of development and redevelopment* involving the loss of historic properties in the city would have a cumulatively significant impact; however, *it can be avoided*.

H-11

The most obvious alternative was not offered in the EIR. Owners of cited properties should be forced to maintain and repair their properties according to city code. If the property owner claims to be unable to pay for the mandated repairs, simply refer them to the Public Works Department where someone can explain what happens when the state mandates a new \$45M wastewater treatment plant. The public is not responsible for private property! The City is not responsible for private property!

The EIR clearly demonstrated one fact. The City of Placerville has failed in its duty to enforce municipal codes, particularly those related to health and safety. Any real dilapidation and deterioration should have been eliminated by adequate code enforcement. The individuals responsible for the blight should be the ones to remedy it.

The City’s preference for sales tax generating establishments is obvious. The sales tax-generating chain stores also create low-skill service jobs and destroy small businesses that frequently require skilled labor. This is only one way that redevelopment overwhelmingly targets the poor and minorities. The engine driving the redevelopment machine is debt and taxes. The absence of any concrete proof that redevelopment does any good makes

California's redevelopment machine one of the greatest scams of all time. Studies repeatedly show that redevelopment projects are net economic losers once the true costs are tallied in terms of jobs and businesses destroyed and tax breaks and other subsidies to favored developers.

H-11

Page 6.4-8, Listed historic properties within the Project Area

The list of properties contained in the DEIR only itemizes those properties that have been previously identified as listed on the National Register of Historic Places, the State Historic Landmarks, the California Inventory of Historic Resources and Points of Historical Interest.

The Placerville Area is the most historically significant region in the state of California; the Gold Rush is second only to the Civil War as the most important event in our country's history. The California Gold Rush sparked the largest human migration in history. Because of its potential to reveal as yet undiscovered historical resources, every square inch of the Project Area should be considered as having the potential to yield historical information and resources.

In addition to the proposed mitigation measures, a professional historical preservationist/archaeologist must be on site at all times when any proposed demolition, excavation, construction or other work is being accomplished as required mitigation for the potential loss of archaeological or historical resources. Even though newer buildings may have been constructed and an area may not appear to be of historical value, the fact that the disruption of potential historical resources is significant and unavoidable requires that all due diligence must be performed regardless of the cost or inconvenience.

H-12

CEQA states, "A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." Public Resources Code Section 21098.1 further defines what a historic resource is for purposes of CEQA.

Historical resources included in a local register of historical resources, as defined in subsection (k) of Section 5020.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. **The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resource may be an historical resource for purposes of this section.**

The City of Placerville is known for its flagrant abuse of CEQA and that abuse must not be allowed to continue under redevelopment. It is interesting to note that in Appendix C, Historic Resources Report, there are two controversial properties that are noticeably not mentioned: the Herrick Building and the Empire Theater. It would be interesting to know why these

properties were omitted from the report. There is too much at stake to destroy the history that is the very essence of the economic catalyst for our city. The survival of the local merchants and their livelihood depends on it, as well as the future economic stability of the City itself.

In order to address the significant and unavoidable impacts of redevelopment as it affects historic resources, additional mitigation must include that a professional historical survey must be undertaken of all buildings to determine their eligibility for inclusion in any register and for local historical designation and protection. The survey must include all resources, not just buildings, sites and objects, and must be completed before any work is undertaken.

The downtown area must be further protected by the formation of a commercial historic district/historical overlay zone and the imposition of approved design guidelines. No historical buildings should be moved at all. Protection of the historical downtown streetscape is as important as the preservation of individual buildings, as the Main Street area specifically is seen as the heart of our historical heritage. The entire project area must be viewed as one contiguous historical area and not segmented into Disney-like towns, and should share common, compatible and subtle design elements such as light poles and trash receptacles.

H-12

The soon to be formed Historic Advisory Committee must also be given authority to stop any redevelopment activities it deems as not in compliance with the necessary mitigation measures to preserve at all costs the historical resources of our unique location. We cannot predict the future, but we can preserve our past for future generations to enjoy and to pass on to their heirs. "We don't inherit the earth from our ancestors; we borrow it from our children."

I pray that the redevelopment Agency has a thorough understanding of the historical and human significance of their project plan and will strive to protect and preserve *all* the resources within its project area. The harmful effects of redevelopment once done, can't be undone. The loss of history, once gone, is gone forever.

Respectfully,

Sharlene McCaslin

COMMENT LETTER H

February 9, 2011

Sharlene S. McCaslin

Response to Comment H-1

The purpose and use of this Program EIR is discussed in detail on Draft EIR pages 1.0-1 and 1.0-2. According to Public Resources Code (PRC) Section 21090: ~~-(a)~~ An environmental impact report for a redevelopment plan may be a master environmental impact report, program environmental impact report, or a project environmental impact report.” This is a Program EIR; because the document generally considers the cumulative impacts of the redevelopment plan over a 30 year period, relative to the adopted City General Plan, there is no specified life expectancy of the document such as is found with a Master EIR.

As described on Draft EIR page 1.0-2, use of a Program EIR allows the Agency, as the Lead Agency, to evaluate the potential impacts of redevelopment activities at a comprehensive level of detail, focusing on area-wide and cumulative impacts and programmatic mitigation measures. Potential direct impacts that could result in the Project Area from public improvements and facilities projects proposed as part of the Redevelopment Plan are also considered. This Program EIR serves as the environmental baseline for subsequent approvals pursuant to adoption and implementation of the Redevelopment Plan. As individual activities pursuant to the Redevelopment Plan are proposed, the Agency will examine the individual activities to determine whether their effects have been fully evaluated in this Program EIR, and if not, what additional steps should be taken. Additional environmental review for the public and private activities or undertakings pursuant to or in furtherance of the Redevelopment Plan would be required if any of the conditions outlined in CEQA Guidelines Sections 15162 or 15163 were to occur. This includes identification of significant impacts from detailed site and design information that were not identified in this programmatic level EIR. Additional steps may include preparation of an Addendum or Supplement to this EIR, preparation of a Project EIR, or a Negative Declaration.

Response to Comment H-2

Just as adoption of a General Plan cannot state what specific developments will occur on parcels over the life of the General Plan, a redevelopment plan cannot define what specific actions will occur over the 30-year life of the plan. Future actions are dependent upon the amount of tax increment available and City priorities during each five-year implementation planning cycle, and each action will require CEQA review. The potential projects and actions that are allowable under the proposed Redevelopment Plan are discussed in as much detail as currently possible in Draft EIR Chapter 3.0, Project Description, and each analysis subchapter identified the potential actions that could cause an impact. The cumulative analysis was based on General Plan buildout conditions, to assess worst case conditions if the Redevelopment Plan removed all barriers to General Plan buildout.

Response to Comment H-3

CEQA requires that decision makers consider the potential effects of their actions at the earliest possible time. A Redevelopment Plan provides a financing mechanism for possible future actions, and must be consistent with the General Plan at the time of its adoption. Programmatic documents consider the whole of the program, and allow consideration of the

cumulative and area-wide effects of potential future actions. No specific projects were identified for adoption or approval, as identified on Draft EIR page 1.0-4, and all future actions must proceed through the City or County entitlement and/or development review process. The Program EIR may be used only as allowed per CEQA Guidelines Sections 15162 or 15163, as noted in Response to Comment H-1, above.

Response to Comment H-4

The No Project Alternative had similar or greater adverse effects than the proposed project. As described on Draft EIR pages 4.0-5 through 4.0-7, all mitigation measures identified in the Draft EIR are applicable to any future development within the Project Area, and therefore would be required under the No Project Alternative during the development review process. However, health and safety impacts would be anticipated to increase over time due to neglect rather than activity under this Alternative. Although fewer people may move into the Project Area without redevelopment, the City and County have policies and procedures to protect historic structures from most development activities. The significant and unavoidable impacts identified in the EIR include the potential cumulative loss of cultural resources and construction noise, which would occur for any future development whether funded by redevelopment or not. The continued deterioration of existing buildings under the No Project Alternative would be expected to result in a greater level of impact on cultural resources, as “demolition by neglect” of historic buildings occurs. The impact of the No Project Alternative would remain potentially significant and unavoidable for cultural resources, and health and safety impacts would be anticipated to increase.

The conditions of blight are those health and safety and economic conditions that the City has been trying to mitigate through infrastructure improvements and other programs, but has had insufficient funds to effectively implement, as discussed in the Preliminary Report. The Redevelopment Plan is a mechanism to retain property taxes that are generated in the Project Area for use within the Project Area to address public needs. The Draft EIR does not define blight; please see Response to Comment G-5, above. The Draft EIR considers how the removal of barriers to General Plan growth through the elimination of blight, as defined in the Preliminary Report, and the implementation of certain actions such as infrastructure improvements and rehabilitation, may impact the Project Area at a programmatic level.

Response to Comment H-5

Controversy over the concept of redevelopment or eminent domain for non-residential uses is not an environmental controversy. A controversy discussed in a CEQA document would involve public controversy over the environmental effects of a project.

As noted on page 5, above, a Notice of Preparation (NOP) for this EIR was filed with the Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit (SCH) on October 14, 2010. The 30-day public review comment period for the NOP was established starting on October 14, 2010 and ending on November 12, 2010. No comments were received that identified issues of controversy regarding the environmental impact of the proposed project.

Response to Comment H-6

There is no discussion of “preservation goals” in the Draft EIR. The commenter appears to be referring to the Redevelopment Plan objective to provide for the “conservation and preservation of buildings and structures of architectural or other historic significance to the community.” A Cultural Resources chapter was prepared for the Draft EIR, which addresses

historic resources and provides mitigation measures to protect historic resources. Please see Response to Comments C-1, F-1 and F-2.

Response to Comment H-7

The City does not have a noise ordinance that restricts construction noise, as discussed on Draft EIR page 6.7-10. Until the City deals with this issue on a city-wide basis, construction impacts will need to be addressed on a project-by-project basis. Whereas the Agency cannot guarantee that the City will require construction conditions of approval on a case by case basis, this impact was determined to be potentially significant and unavoidable.

To reduce the magnitude of potential construction noise impacts, the following mitigation measure has been added:

6.7-1 The Redevelopment Agency shall ensure construction contracts require that all construction activities shall be limited to between 7:00 am and 7:00 pm on weekdays, and 8:00 am to 7:00 pm on Saturday.

This would reduce the magnitude of the impact, but not to less-than-significant levels. Construction noise, even during daytime operating hours, may remain significant, although temporary, at Project Area sensitive receptors.

Response to Comment H-8

This is a comment on the Redevelopment Plan and the Preliminary Report, not on the adequacy of the environmental analysis. The Draft EIR does not define the project or urbanization. Urbanization is determined by the Agency based on CRL criteria.

Response to Comment H-9

This is a comment on the Redevelopment Plan and the Preliminary Report, which are described in the Project Description as noted in this comment. It is not the purpose of the EIR to identify whether blight will be eliminated, but to assess the potential environmental impacts of activities proposed to be undertaken to alleviate blight. Please see Response to Comment G-5, above.

Response to Comment H-10

The Implementation Plan does identify the five-year priorities in a greater level of specificity than the Redevelopment Plan. However, although it is a list of potential projects and funding is determined to be potentially feasible, none of the projects are funded or approved. Per CEQA Guidelines Section 15262, "A project involving only feasibility or planning studies for possible future actions which the agency, board, or commission has not approved, adopted, or funded does not require the preparation of an EIR or Negative Declaration but does require consideration of environmental factors."

This Program EIR provides the needed consideration of environmental factors at the programmatic level. For example, if the Implementation Plan identifies a vacant historic building next to a creek as a priority for an adaptive use that provides affordable senior housing, this Program EIR has already identified the potential effects of such development, and has identified steps to take, via mitigation measures, to ensure no adverse impacts occur. In this example, the Program EIR requires the Agency to 1) retain a qualified biologist to prepare a site-specific biological survey to determine the potential presence of wetlands, special status species, and/or suitable habitat for special status species, and prepare any necessary mitigation measures (MMs 6.2-2 through 6.2-6); 2) design the

rehabilitation according to the *Secretary of the Interior's Standards* (MM 6.4-3); and 3) conduct due diligence on the site for potential hazards and remediate where indicated (MMs 6.5-1 and 6.5-2). Adequate incorporation and implementation of these measures and any others based on the unique site characteristics of the project will be analyzed in a subsequent CEQA document during the development review process.

Response to Comment H-11

Please see Responses to Comments G-5 and H-9, above.

Response to Comment H-12

The Cultural Resources chapter identifies listed sites as well as the year-built information for all parcels in the Project Area as identified by the County Assessor (Figure 6.4-1). The Draft EIR recognizes both the historical and prehistoric sensitivity of the Project Area, and provides measures to ensure future development considers both subsurface and surface resources during design and construction. Mitigation measures must establish a nexus to their ability to reduce potential adverse impacts. There is no substantial evidence to support hiring a professional architectural historian to assess a modern building based on the windshield survey and information available at the Program level. However, if during site-specific environmental review, evidence is provided that a particular structure, despite being less than 45 years old, may meet the other CRHR criteria or local criteria as a historic structure, the CEQA process is designed to ensure assessment of that resource.

Please also see Responses to Comments B-1, C-1, F-1, and F-2, above.

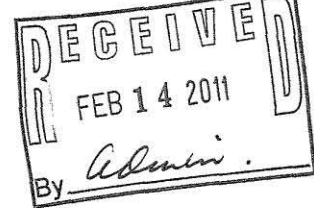
Based on the windshield survey, the Herrick Building and Empire Theater were not listed in the report because they did not appear eligible for listing due to alterations and lack of original physical or design integrity. The Empire Theater Building at 432 Main was originally built in 1850 but burned after 1852. The Placerville Theater took its place, and then it was used as a residence for many years. The several properties on the adjacent lot at 400 Main were divided into five properties which were combined into one lot in 1871. By the late 1920s it appears a project either removed these structures or combined them into the current building. This building has also been modified and is not original to the site, and is certainly not the Empire Theater.

The 301 Main building on the corner adjacent to 305 Main (the Hangtown site) was formerly the Placer Hotel. The wood building was replaced in 1853 or 1854 with the brick building built by Bruce Herrick. The Hangtown oak tree was next door where 305 Main is now. A log cabin on the site was sold to Collis Huntington and others in 1850 where he opened a store - one of the ventures that helped him invest in the Central Pacific Railroad. The 301-305 buildings are listed as a Landmark and Point of Historic Interest as a Site and not as a building; the buildings have been stripped of any significant architectural features. If the building on the corner has retained its original brick structure and could be restored to its original appearance, it could potentially become eligible to the California Register. (This information was derived from the windshield survey, and from "A Walking tour of Historic Placerville" by Jane Schlappi and Marilyn Ferguson, Heritage Association of El Dorado, Placerville, 1973).

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**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

RECEIVED
FEB 15 2011
**CITY OF PLACERVILLE
COMMUNITY DEV. DEPT.**


February 9, 2011

Cleve Morris
City Manager
City of Placerville, Redevelopment Agency
3101 Center Street
Placerville, CA 95667

- Sent via email and United States Postal Service -

Draft Environmental Impact Report for the Placerville Redevelopment Plan

Dear Mr. Morris,

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 Draft Environmental Impact Report (DEIR) issued under the California Environmental Quality Act (CEQA).

OHP commends you on the inclusion of historic and potentially historic properties in your redevelopment plan as successful revitalization for towns with multiple historic resources includes historic preservation. However, we do not understand the inclusion of Section 6.4-4 of the Plan which seems to undermine all of the cultural resource mitigation measures within the Plan. First, although the Section 6.4-4 definition of, and concern for, regional cultural resources is well-stated, the reasoning for potential cumulative impacts being unavoidable is not consistent with CEQA requirements. Also, since the Plan encompasses a specific area it is not clear why region-wide impacts were included in Section 6.4-4. If the Plan is intended to assess region-wide impact the description of the project and scope of the DEIR should be expanded to match that region.

Mitigation of impacts to cultural resources is required by CEQA. The possibility that cultural resources may "frustrate the implementation of projects" is not a sufficient reason to demolish or destroy cultural resources. CEQA reflects the statewide policy that projects with significant environmental impacts, including cumulative impacts to the State's historic environment, should not be approved "if there are feasible alternatives ... available which would substantially lessen the significant environmental effects ..." (Pub. Resources Code § 21002.) CEQA thus requires that alternatives be adopted that would "feasibly obtain most of the basic objectives of the project." (Guideline § 15126.6 subd.(a).) "Feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code § 21061.1.) Findings supporting the infeasibility of an alternative must be supported by "substantial

I-1

3. COMMENT AND RESPONSES

Cleve Morris, pg. 2

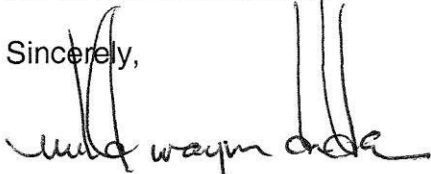
evidence” based on an independent analysis by the lead agency. (Pub. Resources Code § 21081.5; Preservation Action Council, *supra*, 141 Cal. App.4th 1336.) An alternative need not accomplish every project objective, or maximize profitability, to be considered feasible under CEQA.

I-1

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 do not hesitate to contact Ronald Parsons, Historian I, CEQA Coordinator, Local Government Unit at (916) 445-7016 or at rparsons@parks.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Milford Wayne Donaldson".

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

COMMENT LETTER I

STATE OF CALIFORNIA OFFICE OF HISTORIC PRESERVATION DEPARTMENT OF PARKS AND RECREATION

February 9, 2011

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

Response to Comment I-1

Please see Response to Comment F-1, above. This cumulative analysis must consider whether all environmental effects can be mitigated to less than significance if the mitigation measures are adopted. While the mitigation measures will mitigate the loss of character defining historic fabric and archaeological resources to less than significant levels on a case-by-case basis, the Agency at this point in time cannot guarantee that all structures can be preserved over the life of the redevelopment plan, and that all subsurface resources will be preserved. The Project Area has evidence of severe neglect of some historic buildings, and although with enough financial resources most structures can be saved, that is not always possible even with the best of intentions. This impact uses a cumulative threshold that all archaeological or historic resources are unique and non-renewable members of finite classes, thus all adverse effects or negative impacts erode a dwindling resource base. Whereas the EIR cannot identify all future specific redevelopment actions at this time, and cannot ensure that all resources will be protected through adopted mitigation measures, the cumulative impacts may be potentially significant.

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J. VERBAL COMMENTS RECEIVED BY PLANNING COMMISSION ON JANUARY 18, 2011

The verbal comments below only reflect those comments directed to the adequacy of the Draft EIR. Other comments and questions to staff regarding the Redevelopment Plan have been excluded.

COMMENT J-1: KATHLEEN NEWELL

Comments made were concerning redevelopment issues only; no comments were provided regarding the adequacy of the Draft EIR.

Response to Comment J-1

No comments were provided regarding the adequacy of the Draft EIR; therefore, no response is required herein.

COMMENT J-2: DAVID COLE

Comments made were concerning redevelopment issues only; no comments were provided regarding the adequacy of the Draft EIR.

Response to Comment J-2

No comments were provided regarding the adequacy of the Draft EIR; therefore, no response is required herein.

COMMENT J-3: MARY DANTE

Comments made were concerning redevelopment issues only; no comments were provided regarding the adequacy of the Draft EIR.

Response to Comment J-3

No comments were provided regarding the adequacy of the Draft EIR; therefore, no response is required herein.

COMMENT J-4: SHARLENE MCCASLIN

Draft EIR page 2.0-3 - Areas of controversy. Surprised there are no known areas of controversy. Regarding Eminent Domain, I was told to take it up with the state. Like to see it removed from the redevelopment plan. Historic - No protection for locally designated properties. Blight document - how are the plans going to address the specific areas of blight?

Response to Comment J-4

These comments were also submitted in full in writing. Please see Responses to Comment H-1 through H-12.

COMMENT J-5: PETE MCQUILLEN

Comments made were concerning redevelopment issues only; no comments were provided on the Draft EIR.

Response to Comment J-5

No comments were provided regarding the adequacy of the Draft EIR; therefore, no response is required herein.

COMMENT J-6: SUE TAYLOR

Comments made were concerning redevelopment issues only; no comments were provided on the Draft EIR

Response to Comment J-6

No comments were provided regarding the adequacy of the Draft EIR; therefore, no response is required herein.

COMMENT J-7: CHUCK WOLF

Comments made were concerning redevelopment issues only; no comments were provided on the Draft EIR.

Response to Comment J-7

No comments were provided regarding the adequacy of the Draft EIR; therefore, no response is required herein.

K. VERBAL COMMENTS RECEIVED BY PLANNING COMMISSION ON FEBRUARY 1, 2011

COMMENT K-1: SHARLENE McCASLIN

Expressed concern that community has indicated and the General Plan indicates retaining the historic nature and rural nature of Placerville. But the Draft EIR indicated that historic preservation is a significant impact. Resolution of Council (this is the policy resolution the City Council adopted to protect historic nature of downtown) does not include local historic buildings, only those that are on National and State historic registries.

The Draft EIR says Historic Resources and Noise impacts are "significant and unavoidable," which is contradictory to the City's supposed desire to protect Historic District resources. The City has adopted a Resolution outlining goals for preservation. State and Nationally protected resources are protected, but what about locally-designated and yet-to-be-evaluated sites?

Response to Comment K-1

These comments were also submitted in full in writing. Please see Letter H, and Responses to Comment H-1 through H-12, above.

COMMENT K-2: SUE TAYLOR

Comments made were concerning redevelopment issues only; no comments were provided on the Draft EIR.

Response to Comment K-2

No comments were provided regarding the adequacy of the Draft EIR; therefore, no response is required herein.

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5. MITIGATION MONITORING PLAN

INTRODUCTION

The California Environmental Quality Act (CEQA) requires review of any project that could have significant adverse effects on the environment. In 1988, CEQA was amended to require reporting on and monitoring of mitigation measures adopted as part of the environmental review process. This Mitigation Monitoring Plan (MMP) is designed to aid the Redevelopment Agency of the City of Placerville (Agency) in their implementation and monitoring of measures adopted from the Placerville Redevelopment Plan (proposed project or Redevelopment Plan) Draft Environmental Impact Report (Draft EIR) for redevelopment-engendered projects.

MITIGATION MEASURES

The mitigation measures are taken from the Redevelopment Plan's Draft EIR and are assigned the same number as in the Draft EIR. The MMP describes the actions that must take place to implement each mitigation measure, the timing of those actions, and the entities responsible for implementing and monitoring the actions.

MMP COMPONENTS

The components of each monitoring form are addressed briefly, below.

Impact

This column summarizes the significant impact stated in the Draft EIR.

Mitigation Measure

All mitigation measures that were identified in the Redevelopment Plan's Draft EIR are presented, and numbered accordingly.

Action

For every mitigation measure, one or more actions are described. These are the center of the MMP, as they delineate the means by which EIR measures will be implemented, and, in some instances, the criteria for determining whether a measure has been successfully implemented. Where mitigation measures are particularly detailed, the action may refer back to the measure.

Implementing Party

This item identifies the entity that will undertake the required action.

Timing

Each action must take place prior to the time at which a threshold could be exceeded. Implementation of the action must occur prior to or during some part of approval, project design, construction, or on an ongoing basis. The timing for each measure is identified.

Monitoring Party

The City of Placerville, as a Responsible Agency under CEQA, is responsible for ensuring that most mitigation measures are successfully implemented for development projects within the Project Area as they go through individual entitlement processes.

Impact	Mitigation Measure	Action	Implementing Party	Timing	Monitoring Party
Draft EIR Section 6.2 Biological Resources					
Impact 6.2-2 Redevelopment activities and redevelopment-engendered development could result in a potential loss of special status species	<p>For redevelopment projects involving infrastructure improvements or new development within 100 feet of a creek, or on vacant land with mature trees and/or wetlands, the following mitigation measures will ensure that potential impacts to special status species are reduced to less than significance:</p> <p>Mitigation Measure 6.2-2a</p> <p>Prior to project approval, a qualified biologist shall be retained by the project proponent to prepare a site-specific biological survey to determine the potential presence of wetlands, special status species, and/or suitable habitat for special status species. The project proponent shall conduct focused plant surveys according to the requirements in the CNPS Botanical Survey Guidelines for rare plant surveys, to determine the presence or absence of sensitive plant species. The surveys should be conducted during the flowering season of the sensitive plant species, by a qualified botanist with experience and knowledge of the flora of the region. A report of the findings should be submitted to the appropriate agencies within two months of completion of the surveys and will include: a comprehensive species list, a description of habitat characteristics, copies of the survey forms and any notes taken during the survey, date of the survey, and the names of the surveyors.</p> <p>Mitigation Measure 6.2-2b</p> <p>No physical alteration of a development site or issuance of building permits shall occur within potentially biologically sensitive areas until evidence is submitted for review and approval by the City that either no listed plants are present, or areas containing habitat for listed species have been avoided, or if avoidance is not possible, that all</p>	<p>Project proponent shall retain qualified biologist to complete surveys to and report findings to agencies and City within two months of completion.</p> <p>Project proponent shall provide Community Development Director with evidence of no adverse effect and all necessary permits.</p>	Project proponent	During entitlement process and prior to issuing grading permits.	Community Development Director shall ensure report findings are incorporated into environmental reviews during the entitlement process. Community Development Director and Public Works director shall ensure all necessary permits are in place prior to grading permits.

5. MITIGATION MONITORING PLAN

Impact	Mitigation Measure	Action	Implementing Party	Timing	Monitoring Party
	required consultations with the USFWS and/or CDFG have occurred pursuant to the FESA and CESA, and evidence is provided of any necessary permits, approvals, or agreements from USACE and CDFG for removal of any wetland or riparian habitat and/or associated drainages. If avoidance is not possible, a no jeopardy opinion will be required by the USFWS for federally listed species that could be affected. A no jeopardy opinion will not be issued unless USFWS agrees that adequate mitigation of the affected species has been provided. If state-listed species could be affected, a written agreement (such as a 2081 agreement) with CDFG would need to be obtained that specifies that adequate mitigation has been provided. Future proposed development engendered by redevelopment shall be consistent with the provisions of any required consultations and associated permits or agreements.				
Impact 6.2-3 Redevelopment activities and redevelopment-engendered development could result in a potential loss of special status raptor, migratory, or other bird species	Mitigation Measure 6.2-3a No physical alteration of a development site or issuance of building permits shall occur within existing woodlands or riparian areas until a breeding season survey is conducted by a qualified biologist during spring or early summer (from February 1 through August 31, before development activity takes place) near annual grasslands, large trees, and riparian areas. The survey shall be conducted no more than 30 days prior to the start of work activities and shall cover all affected areas – including a 250-foot buffer area around the active project area, staging areas, and access road improvement areas where substantial ground disturbance or vegetation clearing is required. If no active nest of a bird of prey or MBTA bird is found, then no further action is necessary. If construction begins outside the February 1 to August 31 breeding season, there will be no need to	Project proponent shall retain qualified biologist to complete pre-construction surveys and report findings to CDFG and City within one week of completion. Where indicated, project proponent shall retain qualified biologist to monitor the site and determine construction limits. Construction requirements shall be incorporated into construction contracts.	Project proponent	Prior to issuing grading and building permits.	The Community Development Director and Building Official shall ensure all necessary protocols and buffer areas are in place prior to grading permits.

Impact	Mitigation Measure	Action	Implementing Party	Timing	Monitoring Party
	<p>conduct a preconstruction survey for active nests. If a nest becomes active after construction has started, then the bird is considered adapted to construction disturbance. An active nest is one with eggs or unfledged young</p> <p>Mitigation Measure 6.2-3b</p> <p>If surveys detect an active nest of a bird of prey or MBTA bird on the project site, then the biologist shall determine the size of an Environmentally Sensitive Area around the nest. The Environmentally Sensitive Area size shall be subject to City approval. The size of suitable nest buffers depends on the species of bird, the location of the nest relative to the project, project activities during the time the nest is active, and other situation specific conditions.</p> <p>Construction activities shall be prohibited within this buffer zone until the end of the nesting season (mid August), or until the young have fledged. A qualified wildlife biologist shall monitor the nest to determine when the young have fledged and submit weekly reports to the CDFG and the City throughout the nesting season. If the qualified biologist determines that a disturbance is occurring, construction shall be halted, and the CDFG shall be contacted to determine the need for additional protection measures.</p> <p>Mitigation Measure 6.2-3c</p> <p>Identified nesting trees approved for removal may only be removed prior to the onset of the nesting season (March 1) or after young have fledged (mid August).</p>				
Impact 6.2-4 Redevelopment activities and redevelopment-engendered	<p>Mitigation Measure 6.2-4a</p> <p>Concurrent with breeding bird surveys (Mitigation Measure 6.2-3a), a qualified biologist shall conduct preconstruction surveys for special-status bats within suitable open structures and large trees (e.g., > 24</p>	Project proponent shall retain qualified biologist to complete pre-construction surveys and monitor	Project proponent	Prior to and during construction.	The Community Development Director and Building Official shall ensure all necessary

5. MITIGATION MONITORING PLAN

Impact	Mitigation Measure	Action	Implementing Party	Timing	Monitoring Party
development have the potential to affect roosting or breeding special-status bats in the Project Area	<p>inch diameter at breast height (DBH)) on the site. If special status bat species are identified on-site, the biologist shall evaluate whether breeding adults or juveniles are present. If present, a suitably sized buffer (e.g., 100 to 150 feet) shall be placed around the roost if it appears that grading, tree removal or other project activities may cause abandonment. If it appears that demolition activities may cause nest abandonment, demolition activities must cease until juvenile bats are self-sufficient and would not be directly impacted by project activities.</p> <p>Mitigation Measure 6.2-4b</p> <p>If special-status bats (i.e., pallid bat, silver-haired bat, Townsend's Pacific big-eared bat) are found on-site, and the roost would be destroyed during development, an artificial roost shall be provided for the bats. The roost shall be constructed and placed on-site prior to removal of the original roost. The project sponsor shall prepare a mitigation plan specifying the construction details and siting of the structure. The plan shall be approved by the City and CDFG prior to removal of the existing roost. The project sponsor shall provide a secure source of funding for the monitoring of the artificial roost for a period of at least 5 years. The site on which the artificial roost is located shall be placed in a conservation easement. A report documenting the implementation of the plan shall be provided to the City within one month of completion of the artificial roost. The plan shall be completed and implemented prior to the issuance of the grading permit.</p>	<p>construction activities. Construction requirements shall be incorporated into construction contracts.</p>			<p>protocols and buffer areas are in place prior to and during construction.</p>
Impact 6.2-5 Potential jurisdictional seasonal wetlands, non-wetland waters, and waters of the US	<p>Mitigation Measure 6.2-5a</p> <p>Wetland Delineation: On parcels containing potential wetlands, a USACE-verified wetland delineation and jurisdictional determination of the parcel shall be completed before any earthmoving or grading activities within or adjacent to potential jurisdictional</p>	<p>Project proponent shall retain qualified engineer to complete delineation survey. Project proponent shall provide Community</p>	Project proponent	During entitlement process and prior to issuing grading	Community Development Director shall ensure report findings are incorporated

Impact	Mitigation Measure	Action	Implementing Party	Timing	Monitoring Party
and State could be adversely affected by grading, construction, and improvements in connection with future redevelopment projects	<p>wetlands and drainages. If the USACE determines that areas on the project site are jurisdictional, all work proposed in these areas shall be authorized by permits from the USACE. All applicable permits from the CDFG and RWQCB will also be obtained before construction in areas under the jurisdiction of these agencies, and provided to the City prior to the initiation of ground disturbing activities or other construction activities. The permitting agencies would need to be contacted by the owner in the event of any significant deviation from permitting conditions. If the USACE determines that the seasonal wetlands on a development site are protected by Section 404 of the CWA, the project would qualify as a permitted project under the Programmatic Biological Opinion (PBO; USFWS, 2007). The USACE will then enter into consultation with USFWS in order to appropriately address the federally listed species in the USACE wetland permit. This action would effectively append the project to the PBO.</p> <p>Mitigation Measure 6.2-5b</p> <p>If construction activities occur within any creek channel, ditches with a defined bed and bank, or within the riparian woodland drip line, the project sponsor shall obtain a SAA from the CDFG. The project sponsor shall provide proof to the City of compliance with the terms and conditions of the permits prior to issuance of the grading permit and prior to any construction in jurisdictional waters.</p> <p>Mitigation Measure 6.2-5c</p> <p>Wetland Avoidance and Minimization: To the extent feasible, the final project design will avoid and minimize effects to wetlands and other waters. Areas that are avoided will be protected from construction activities through implementation of Best Management Practices (BMPs).</p>	Development Director with evidence of no adverse effect and all necessary permits.		permits.	into environmental reviews during the entitlement process. Community Development Director and Public Works director shall ensure all necessary permits are in place prior to grading permits.

5. MITIGATION MONITORING PLAN

Impact	Mitigation Measure	Action	Implementing Party	Timing	Monitoring Party
<p>Impact 6.2-6 Redevelopment activities and redevelopment-engendered development could result in the loss of aquatic and terrestrial habitat for special status amphibians and reptiles, and may result in direct impacts to these species through injury or mortality</p>	<p>Implementation of the following three-part mitigation measure would reduce the impact to pond turtles and frogs to a less-than-significant level.</p> <p>Mitigation Measure 6.2-6a In conjunction with Mitigation Measure 6.2-2a, above, surveys to determine the habitat suitability for or the presence of NWPTs shall be conducted to identify basking sites and potential nesting areas and shall be conducted during the spring or summer when the turtles and frogs are active and observable.</p> <p>Mitigation Measure 6.2-6b Where special status turtles and frogs are found, preconstruction surveys shall be conducted at least 48 hours prior to work in turtle and frog habitat. Any frogs or turtles observed during the preconstruction survey shall be relocated to at least 300 feet up or down stream of the work area. A qualified biologist will be present during grubbing and clearing activities in the riparian and aquatic habitat of a project site. If aquatic amphibians and reptiles are observed in the construction area, construction will cease until a qualified biologist determines that aquatic amphibians and reptiles are not in the construction zone.</p> <p>Mitigation Measure 6.2-6c Temporary construction barrier fencing (including sedimentation fencing in some cases) will be installed along the creek(s) within a project site. The fencing shall be removed once the construction is completed or by October 15 of the construction year, whichever comes first.</p> <p>Mitigation Measure 6.2-6d Environmental awareness training will be conducted prior to onset of project work for construction personnel to brief them on how to recognize aquatic amphibians including CRLF, FYLF, and NWPT.</p>	<p>Developer shall retain qualified biologist to complete pre-construction surveys and monitor construction activities. Construction requirements shall be incorporated into construction contracts.</p>	Developer	Prior to and during construction	The Community Development Director and Building Official shall ensure all necessary protocols and buffer areas are in place prior to and during construction.

Impact	Mitigation Measure	Action	Implementing Party	Timing	Monitoring Party
	<p>Mitigation Measure 6.2-6e If CRLF is encountered in the work area, construction should stop and the USFWS contacted for guidance.</p> <p>Mitigation Measure 6.2-6f The City shall implement BMPs to protect water quality and control erosion. A spill prevention and clean-up plan shall be prepared.</p>				
DRAFT EIR Section 6.3 Climate Change					
Impact 6.3-1 Redevelopment-engendered development and infrastructure construction activities would generate greenhouse gas emissions that could contribute to global climate change	<p>Mitigation Measure 6.3-1 All redevelopment construction activities shall implement best management practices (BMPs) for construction applicable at the time of project approval as required by the EDCAQMD for air quality emissions. Additional practices shall include, but are not limited to:</p> <ul style="list-style-type: none"> a) Alternative-fueled (e.g., biodiesel, electric) construction vehicles/equipment b) Local building materials c) Recycle construction waste and demolition materials 	Construction activities shall implement best management practices for construction applicable at the time of project approval as required by the EDCAQMD for air quality emissions.	Developer Redevelopment Agency City	Entitlement Process and during construction	EDCAQMD and Community Development Department shall verify compliance during construction
DRAFT EIR Section 6.4 Cultural Resources					
Impact 6.4-1 Redevelopment projects and redevelopment-engendered development could cause a substantial adverse change in the significance of an archaeological resource, including	<p>The following mitigation measure is identified for any proposed redevelopment project within the Project Area:</p> <p>Mitigation Measure 6.4-1a The North Central Information Center (NCIC), Native American Heritage Commission (NAHC), and the United Auburn Indian Community of the Auburn Rancheria (UAIC) shall be consulted to determine if a proposed project would require archaeological study and/or testing be conducted as part of the site-specific environmental review. Recommended study</p>	<p>The developer shall provide the Agency with a copy of the NCIC report for the project site.</p> <p>The developer shall provide the City Community Development Department with a copy of contract</p>	Developer Redevelopment Agency City	Prior to the start of demolition and/or grading permits	The Agency, City Project Coordinator, or Community Development Department shall include a copy of the NCIC report and construction

5. MITIGATION MONITORING PLAN

Impact	Mitigation Measure	Action	Implementing Party	Timing	Monitoring Party
human remains	<p>and/or testing shall be completed prior to completion of environmental review.</p> <p>Mitigation Measure 6.4-1b</p> <p>Foremen and key members of major excavation, trenching, and grading for sites preparation shall be instructed to be wary of the possibility of destruction of buried cultural resource materials. They shall be instructed to recognize signs of prehistoric use and their responsibility to report any such finds (or suspected finds) immediately, as specified by measure 6.4-1c below, so damage to such resources may be prevented.</p> <p>Mitigation Measure 6.4-1c</p> <p>Should any cultural resources, such as structural features, unusual amounts of bone or shell, artifacts, human remains, or architectural remains be encountered during any development activities, all work within 20 meters of the find shall be suspended and a qualified archaeologist shall be consulted to develop, if necessary, further mitigation measures to reduce any archaeological impact to a less-than-significant level before construction continues. Such measures could include (but would not be limited to) researching and identifying the history of the resource(s), mapping the locations, and photographing the resource. In addition, pursuant to Section 5097.98 of the PRC, and Section 7050.5 of the State Health and Safety Code, in the event of the discovery of any human remains, all work is to stop and the County Coroner shall be immediately notified. If the remains are determined to be Native American, the UAIC will be consulted and the guidelines of the Native American Heritage Commission (NAHC) shall be adhered to in the treatment and disposition of the remains.</p>	<p>requirements that include the conditions for the contractor for the project.</p> <p>Include mitigation measures as conditions in construction contract documents</p>			<p>conditions in the project file.</p> <p>The Community Development Department shall verify compliance during construction.</p>

Impact	Mitigation Measure	Action	Implementing Party	Timing	Monitoring Party
Impact 6.4-2 Redevelopment projects and redevelopment-engendered development could cause a substantial adverse change in the significance of a paleontological resource	Mitigation Measure 6.4-2 If paleontological resources, such as fossilized bone, teeth, shell, tracks, trails, casts, molds, or impressions are discovered during ground-disturbing activities, work will stop in that area and within 25 feet of the find until a qualified paleontologist can assess the significance of the find, and if necessary, develop and implement appropriate treatment measures in consultation with the City.	The developer shall provide the City Community Redevelopment Department with a copy of contract requirements that include the conditions for the contractor for the project. Developer shall retain qualified paleontologist to evaluate any unanticipated discoveries and conduct consultations. Include mitigation measures as conditions in construction contract documents.	Developer Redevelopment Agency City	Entitlement process and before demolition and/or construction	The Agency, City Project Coordinator, or Community Development Department shall include a copy of the construction conditions in the project file. Community Development Department shall verify compliance during construction
Impact 6.4-3 Redevelopment projects and redevelopment-engendered development could result in the potential alteration, removal, or destruction of historic resources	Mitigation Measure 6.4-3a As part of any OPA, DDA, or other Agency action or project that would affect any structure or feature over 45 years old that has not been evaluated, the buildings shall first be evaluated for eligibility for listing in the CRHR. The determination of eligibility shall be made by an expert who, at a minimum, meets the Secretary of the Interior's Professional Qualification Standards for Architectural History. This evaluation shall occur through the preparation of DPR 523 forms for each building and standard CEQA evaluation, and shall include consultation with the El Dorado County Historical Society. Mitigation Measure 6.4-3b For properties determined to be eligible for listing in the CRHR, the Secretary's Standards shall be applied to insure that treatments will maintain the	Agency or Developer shall conduct evaluation prior to project-specific approval and a DPR 523 A form submitted to the State Office of Historic Preservation (SHPO). Where warranted, the Secretary's Standards shall be used for rehabilitation and reuse design. Where warranted, HABS/HAER recordation shall be	Developer Redevelopment Agency City	Assessment and design shall occur prior to project approval. The HABS/HAER, where warranted, shall be completed prior to demolition of any features.	The Community Development Department shall verify compliance during construction. The Agency, City Project Coordinator, or Community Development Department shall include a copy of assessment or the

5. MITIGATION MONITORING PLAN

Impact	Mitigation Measure	Action	Implementing Party	Timing	Monitoring Party
	<p>authenticity and integrity of character-defining historical features. No character-defining features of an eligible structure shall be demolished.</p> <p>Mitigation Measure 6.4-3c</p> <p>If demolition of some features cannot be avoided, where those features do not remove the building from eligibility for the CRHR, then the feature(s) shall be recorded to Historic American Building Survey/Historic American Engineering Record (HABS/HAER) standards prior to their removal. Copies of the HABS/HAER documentation shall be filed with the OHP. HABS/HAER recordation typically includes the following:</p> <ol style="list-style-type: none"> The development of site-specific history and appropriate contextual information regarding the particular resource. In addition to archival research and comparative studies, this task could involve limited oral history collection. Accurate mapping of the resources, scaled to indicate size and proportion of the structures. Photo documentation of the designated resources, both in still and video formats. Recordation by measured architectural drawings, in the case of specifically designed structures of high architectural merit; —as—built” plans of existing structures/foundation ruins will involve field measurements, office scaled plan layout, and plot out of final plan. 	completed and filed with the City and SHPO.			HABS/HAER in the project file.
DRAFT EIR Section 6.5 Hazards and Hazardous Materials					
Impact 6.5-1 Redevelopment-engendered development and infrastructure	Mitigation Measure 6.5-1a A thorough examination of past property uses shall be required for redevelopment projects involving demolition or reuse of properties constructed before 1978, or construction on vacant land, prior to	Developer shall retain qualified environmental engineer to complete Phase I ESA, and shall follow recommendations,	Developer Redevelopment Agency	Before demolition and/or construction	Community Development Department shall verify compliance during

Impact	Mitigation Measure	Action	Implementing Party	Timing	Monitoring Party
construction could disturb unidentified contaminated soil and structures	<p>demolition or construction. This examination shall conform to the Phase I Environmental Site Assessment (ESA) process established by the American Society for Testing and Materials (ASTM), and shall include site reconnaissance, a review of regulatory databases, interviews with persons knowledgeable of the property, and a review of past property uses using appropriate historical sources. A Phase II ESA shall be conducted if deemed necessary based on the Phase I ESA results.</p> <p>Mitigation Measure 6.5-1b</p> <p>If discolored soil, vapors, or contaminated groundwater are encountered during construction activities, all work shall cease until a qualified environmental professional assesses the situation and appropriate action is taken to ensure the safety of the workers and the public.</p> <p>Mitigation Measure 6.5-1c</p> <p>The Agency shall require in construction contract documents that a hazardous materials removal team be on-call and available for immediate response during site preparation, excavation, and other construction activities. Hazardous material removal activities must be contracted to a qualified hazardous materials removal contractor.</p> <p>Construction contract documents shall require the hazardous material removal contractor or subcontractor to comply with the following:</p> <ol style="list-style-type: none"> (1) Prepare a hazardous material discovery and response contingency plan for review by the El Dorado County Fire District (EDCFD). The EDCFD will act as the first responder to a condition of extreme emergency (i.e., fire, emergency medical assistance, etc). (2) In the event that a condition or suspected condition of soil and/or groundwater contamination are discovered during construction, 	including any necessary soil or groundwater testing to characterize site, and any required remediation to the satisfaction of the City.			construction.

5. MITIGATION MONITORING PLAN

Impact	Mitigation Measure	Action	Implementing Party	Timing	Monitoring Party
	<p>work shall cease or be restricted to an unaffected area of the site – as the situation warrants – and the City of Placerville (City) shall be immediately notified. Upon notification, the City shall notify the EMD Hazardous Materials Division, of the contamination condition, and the hazardous material removal contractor shall prepare a site remediation plan and a site safety plan, the latter of which is required by OSHA for the protection of construction workers. Similarly, the hazardous material removal contractor shall follow and implement all directives of the EMD and any other jurisdictional authorities that might become involved in the remediation process.</p> <p>(3) Preparation of any remediation plan shall include in its focus measures to be taken to protect the public from exposure to potential site hazards and shall include a certification that the remediation measures would clean up the contaminants, dispose of the wastes properly, and protect public health in accordance with federal, state, and local requirements.</p> <p>(4) Obtain closure and/or No Further Action letters from the appropriate agency(ies).</p> <p>(5) Construction contract documents shall include provisions for the proper handling and disposal of contaminated soil and/or dewatering water (including groundwater and contaminated rainwater) in accordance with federal, state, and local requirements.</p>				
Impact 6.5-2 Redevelopment could result in the rehabilitation or demolition of buildings likely to	Mitigation Measure 6.5-2a Prior to any Agency rehabilitation or demolition activities, the Agency shall conduct an interior survey to evaluate the presence of ACM, lead based paint, PCB-containing electrical and hydraulic fluids, and/or CFCs, as well as any other potential environmental	Developer or Agency shall retain a qualified assessor to conduct an interior survey and abate any identified contamination	Developer Redevelopment Agency	Before demolition and/or rehabilitation	Community Development Department shall verify compliance during demolition or

Impact	Mitigation Measure	Action	Implementing Party	Timing	Monitoring Party
contain asbestos, lead-based paint, or other hazardous substances	<p>concerns (i.e., aboveground/underground fuel tanks, elevator shafts/hydraulic lifts, floor drains/sumps, chemical storage/disposal) which may be present within structures on a project site.</p> <p>Mitigation Measure 6.5-2b</p> <p>A project applicant for a project subject to an Owner Participation Agreement (OPA) or Disposition and Development Agreement (DDA) shall provide written documentation to the Agency that ACM and lead-based paint has been abated and any remaining hazardous substances and/or waste have been removed in compliance with applicable state and local laws and regulations.</p>	Developer shall provide Agency and City with proof of abatement.			rehabilitation.
<p>Impact 6.7-1</p> <p>Redevelopment - engendered development and infrastructure projects could result in construction noise at sensitive receptors</p>	<p>Mitigation Measure 6.7-1</p> <p>The Redevelopment Agency shall ensure construction contracts require that all construction activities shall be limited to between 7:00 am and 7:00 pm on weekdays, and 8:00 am to 7:00 pm on Saturday.</p>	The Agency shall include mitigation measure as condition in construction contract documents.	Developer Redevelopment Agency City	Contracting	<p>The Agency, City Project Coordinator, or Community Development Department shall include a copy of the construction conditions in the project file.</p> <p>Community Development Department shall verify compliance during construction</p>

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