16.0 OTHER CEQA-REQUIRED SECTIONS

16.1 ALTERNATIVES

This section provides a brief description of those alternatives to the proposed project that were considered and eliminated from further consideration. It also provides a comparative analysis of two alternatives, the No Project Alternative and the Original Alignment Alternative, pursuant to Section 15126.6 of the California Environmental Quality Act Guidelines (State CEQA Guidelines). These alternatives are examined at a lesser level of detail than the analysis of the proposed project in Chapters 4.0 through 15.0 of this draft environmental impact report (DEIR) (State CEQA Guidelines Section 15126.6[d]). The purpose of this chapter is to provide decision makers with an assessment of the comparative effects of the project alternatives, focusing on the significant impacts and on mitigation of such impacts. An "environmentally superior" alternative is identified pursuant to Section 15126.6(e)(2) of the State CEQA Guidelines.

Alternatives may be eliminated from detailed consideration in the DEIR if they fail to feasibly meet most of the basic project objectives, are infeasible, or do not avoid any significant environmental effects (State CEQA Guidelines Section 15126.6[c]). Lead agencies are guided by the general definition of feasibility found in CEQA: "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (State CEQA Guidelines Section 15364). Based on these guidelines, several alternatives have been eliminated from further consideration. These alternatives are briefly described below.

16.1.1 ALTERNATIVES CONSIDERED AND ELIMINATED FROM FURTHER CONSIDERATION

The following alternatives were considered in the planning stages of the proposed project: the North Side of River Alternative, the Bifurcation Alternative, the 4-foot Trail Alternative, the Revised Alignment Alternative, and the Ridgetop Alternative. Because these alternatives do not meet the goals and objectives of the proposed project and in some cases would result in more severe impacts than the proposed project, they are not considered here at a level of detail equal to consideration of the proposed project.

NORTH SIDE OF RIVER ALTERNATIVE

A trail alignment along the north side of the North Fork American River canyon was evaluated when the proposed project was being developed in conjunction with the Trail Advisory Group (TAG). Because of the increased temperature and dry soil conditions caused by the southern exposure to the sun, vegetation is less dense on the north side of the North Fork American River than on the south side. Therefore, a trail located on the north side of the river would be more visible from Lake Clementine and the river. A trail on the north side would have to be routed halfway up the slope of the canyon and through private property to avoid a large landslide located downstream of Clementine Dam.

In addition to these constraints, there are numerous historic structures on the north side of the canyon that would have to be avoided when determining the trail alignment. If a trail were constructed on the north side of the canyon, there would be no connections to existing trails, and access to staging termini on the opposite bank of the river would be limited (TAG 2003). For these reasons, it was determined that this alternative would not meet the goals and objectives of the proposed project, is infeasible because of opposition from private-property owners, and would not avoid any significant effects compared to the proposed project. Therefore, this alternative was eliminated from further consideration.

BIFURCATION ALTERNATIVE

The Bifurcation Alternative was proposed by the advocacy group, Friends of the North Fork, during the settlement hearing for the Initial Study/Environmental Assessment (IS/EA). This alternative is characterized by separated user segments and describes a trail alignment moving from the North Fork to the Middle Fork American River near the Ruck-A-Chucky Rapids and along sections of Driver's Flat, McKeon Ponderosa, and Foresthill Roads. In addition, the Bifurcation Alternative contains gaps in the alignment between staging termini. For ease of comparison, the Bifurcation Alternative alignment described below and as depicted on Exhibit 16-1 is split into three segments that cover roughly the same areas as the five proposed project trail segments.

The first segment of trail under the Bifurcation Alternative would stretch from the confluence to Lake Clementine Road (approximately 1.9 miles). This area roughly corresponds with Segment 5 of the trail under the proposed project and is an existing trail. This trail segment of the Bifurcation Alternative would generally follow the trail alignment for the proposed project. The trail would serve multiple uses as under the proposed project, except at the extreme downstream end of the trail (from the confluence to just upstream of the Foresthill Bridge). At the downstream end of the trail, equestrians would proceed down the steep hill from the Foresthill Bridge Staging Terminus while hikers and mountain bikers would follow the existing riverside trail from the confluence parking area to the bridge.

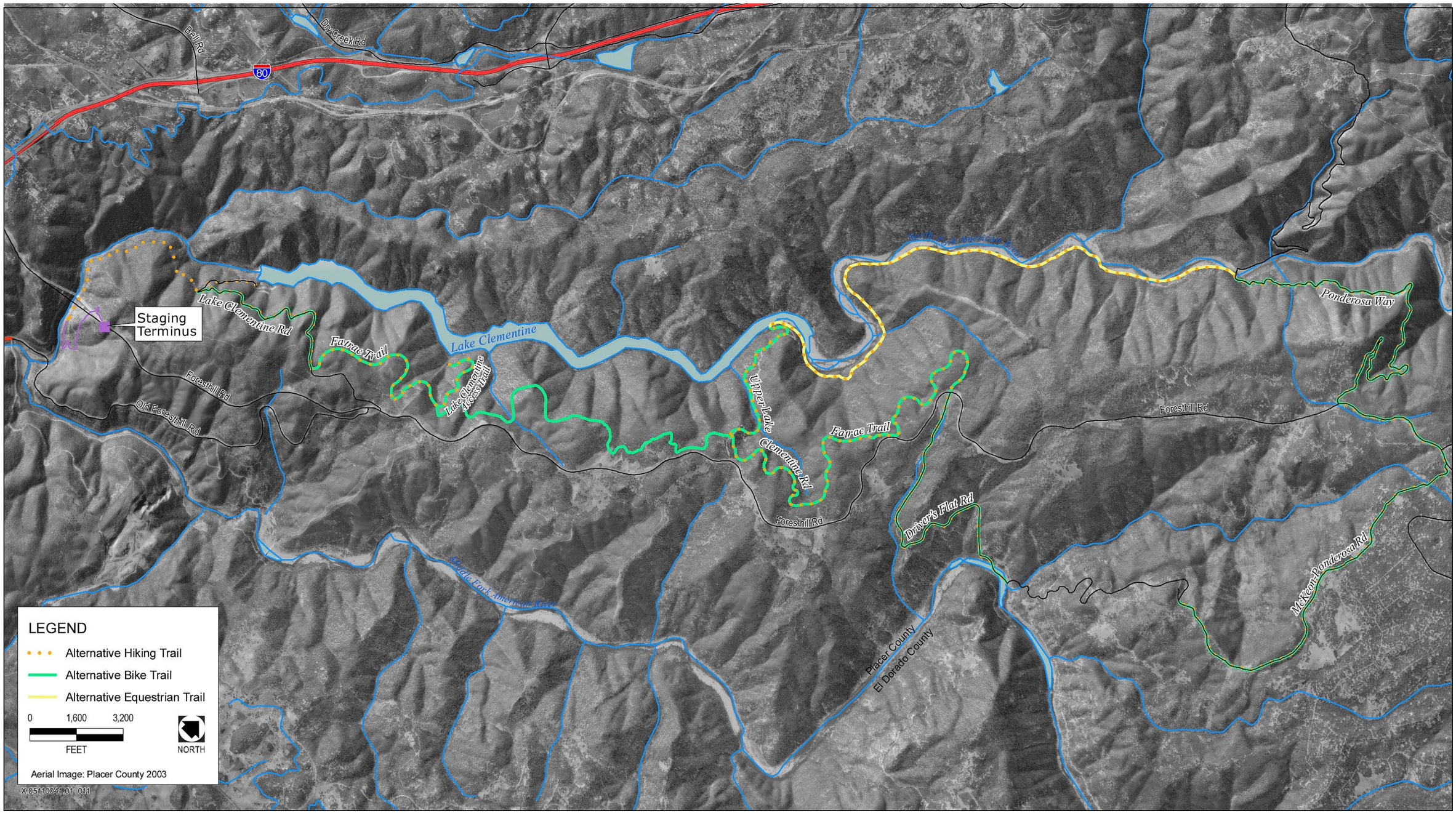
The second segment of trail under the Bifurcation Alternative would cover the area between Lake Clementine Road and Upper Lake Clementine Road (represented in the proposed project by Segments 3 and 4). In the downstream portion of this segment (between Lake Clementine Road and the Lake Clementine Access Trail at the lake's midpoint), the different trail uses would likely split onto different routes. Hikers could follow Lake Clementine Road downhill roughly 0.5 mile to connect to an existing, minimally maintained lakeside trail between the boat launch parking lot and the bottom of the Lake Clementine Access Trail. This 1.6-mile-long lakeside trail would also be evaluated for possible equestrian use. Mountain bikers would follow Lake Clementine Road uphill approximately 1.3 miles to connect to the existing Connector Trail then would follow the Connector Trail approximately 0.8 mile to the Lake Clementine Access Trail.

In the upstream part of this trail segment (between the Lake Clementine Access Trail and Upper Lake Clementine Road), all trail users would continue uphill for approximately 0.5 mile along the Lake Clementine Access Trail, which has a locked gate and no traffic. It then would connect to and follow an abandoned road up the canyon to a former bridge site. In the area upstream of the bridge site, either hikers would continue along an existing narrow hiking trail near the lake and equestrians and mountain bikers would use a connecting trail (if one can be located) (roughly 2.5 miles), or a yet-to-be-proposed route would be established to connect the former bridge site to Upper Lake Clementine Road via a waterfall road (2.2 miles).

The third segment of trail under the Bifurcation Alternative would stretch from Upper Lake Clementine Road to McKeon-Ponderosa Road (represented in the proposed project by Segments 1 and 2). As in the previous trail segment, different trail uses would split onto different routes, as described below.

Hikers would follow Upper Lake Clementine Road roughly 0.1 mile to the old "Switchback Road" that goes upstream from the last switchback above the parking lot and beach. Hikers would then follow existing hiking trails and gravel bars to McKeon-Ponderosa Road, a distance of roughly 4.5 miles. Measures would be taken to regulate present use of four-wheel-drive vehicles in the riverbed to protect the trail and assure that the trail does not worsen the problems caused by these vehicles.

Equestrians and mountain bikers would follow Upper Lake Clementine Road uphill roughly 1.2 miles to the existing Foresthill Divide Loop Trail, and then follow this trail to the Long Point Fuel Break Trail. They would then continue on the Long Point Fuel Break Trail to the canyon rim. From there, they would take Driver's Flat Road to McKeon-Ponderosa Road.



Source: Placer County 2006

Bifurcation Alternative

Exhibit 16-1

This alternative does not meet the purpose and objectives of the proposed project to provide a multiple-use trail that reduces overcrowding on existing trails. This alternative relies on extensive use of existing trails, which would cause continued overcrowding, user conflicts, and overuse of these trails. Some of the "existing trails" were not located during site investigations conducted for this project and are assumed to be overgrown with vegetation. This alternative would not discourage informal connections between trails, would not allow for multiple uses along a proposed trail, and would not connect to any termini to facilitate user access. The segments of the Bifurcation Alternative alignment near the river/lake would be within the floodplain of the river and would be extremely difficult to maintain because of regular flooding of this area. These segments of trail would also be more visible from the river/lake and could create potential user conflicts with water-recreation users. Additionally, the riparian areas adjoining the river are considered sensitive habitat types, and TAG recommended against siting a trail near the river. For these reasons this alternative was eliminated from further consideration.

4-FOOT TRAIL ALTERNATIVE

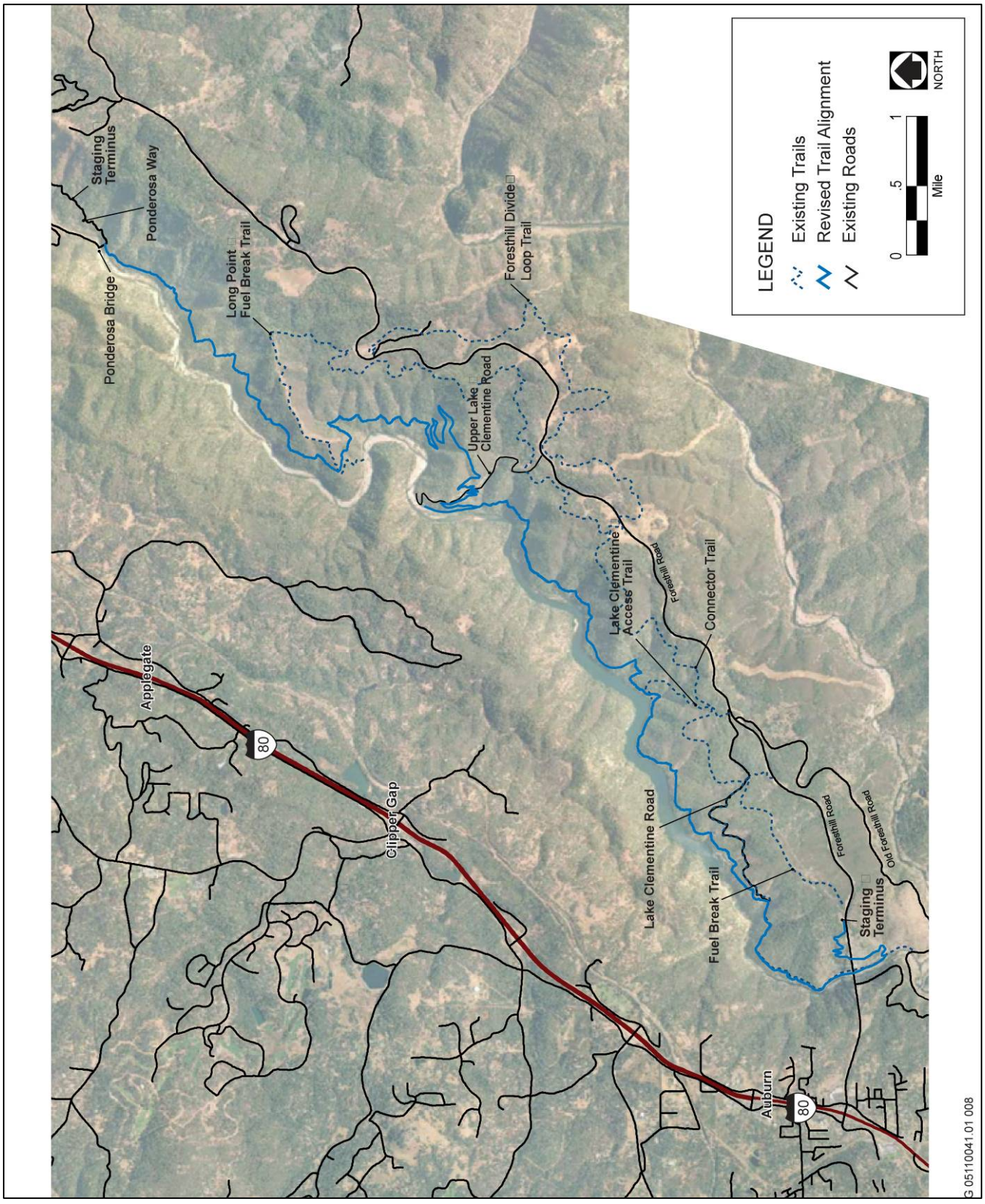
A trail that would follow the same alignment as the proposed project and have a 4-foot trail tread width was evaluated when the proposed project was being developed. This alternative would follow the proposed alignment shown in red on Exhibit 3-2, but would be narrower than the proposed trail. A trail with a slightly narrower tread width would have slightly less impact on biological resources, cultural resources, and hydrology and water quality compared to the proposed project; however, a narrower tread width would have more of an impact on user safety and recreation because of user conflicts and reduced lines of sight. In addition, this trail width would not meet the project's objectives nor conform to State Parks' standards for multiple-use trails. This alternative may result in slightly less impact on some resources compared to the proposed project; however, it would not significantly reduce any impacts.

REVISED ALIGNMENT ALTERNATIVE

This alternative, as shown in Exhibit 16-2, would be approximately 5 feet wide and 14.4 miles long. The Revised Alignment Alternative would have the same termini as the proposed trail alignment, but would follow a different alignment along the south side of the canyon. This alternative would require easements through private property. Impacts of this alternative would be similar to the proposed project; however, this alternative would have slightly more impacts on biological resources because of three additional drainage crossings. This alignment would also have a slightly narrower width than the proposed trail, which would not meet project objectives nor conform to State Parks' standards for multiple-use trails. The narrower tread width would have more of an impact on user safety and recreation because of user conflicts and reduced lines of sight. Overall, this alternative would have similar impacts as the proposed project.

RIDGETOP ALTERNATIVE

This alternative would include construction of a trail along the ridgetop of the canyon that divides the North Fork and the Middle Fork of the American River. A similar trail, the Connector Trail, was constructed by Placer County (County) approximately 3 years ago, and connects the Lake Clementine Trail and the Foresthill Divide Loop Trail. Although the Connector Trail is used primarily by mountain bikers, it is open to multiple uses; therefore, it would be redundant to construct another trail in this area. For this reason the Ridgetop Alternative was determined to be infeasible. This alternative would not reduce any significant effects of the proposed project. Therefore, this alternative was eliminated from further consideration.



Source: Placer County 2006

Revised Alignment Alternative **Exhibit 16-2**

16.1.2 ALTERNATIVES SELECTED FOR MORE DETAILED ANALYSIS

Pursuant to Section 15126(f) and Section 15126.6 of the State CEQA Guidelines, this DEIR includes an analysis of the Original Alignment Alternative, as well as the required review of the No Project Alternative.

State CEQA Guidelines Section 15126.6(a) calls for an evaluation of "… a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Section 15126.6(f) specifies that the range of alternatives is governed by the "rule of reason," requiring evaluation of only those alternatives "necessary to permit a reasoned choice." Alternatives shall be "limited to ones that avoid or substantially lessen any of the significant effects" of the proposed project. Because the proposed project would not result in significant effects that cannot be mitigated to less-than-significant levels, the discussion of alternatives is provided for comparison purposes only.

State CEQA Guidelines Section 15126.6(e) requires that, among other alternatives, a "no project" alternative be evaluated in comparison to the proposed project. It states that the purpose of the "no project" alternative is to "allow decision-makers to compare the impacts of approving the proposed project with the impact of not approving the proposed project." It also states that the "no project" analysis shall "discuss the existing conditions…, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved…" Accordingly, this section provides an analysis of the "no project" alternative.

The environmentally superior alternative is also identified, as required by the State CEQA Guidelines. Section 15126(e)(2) states that "[i]f the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

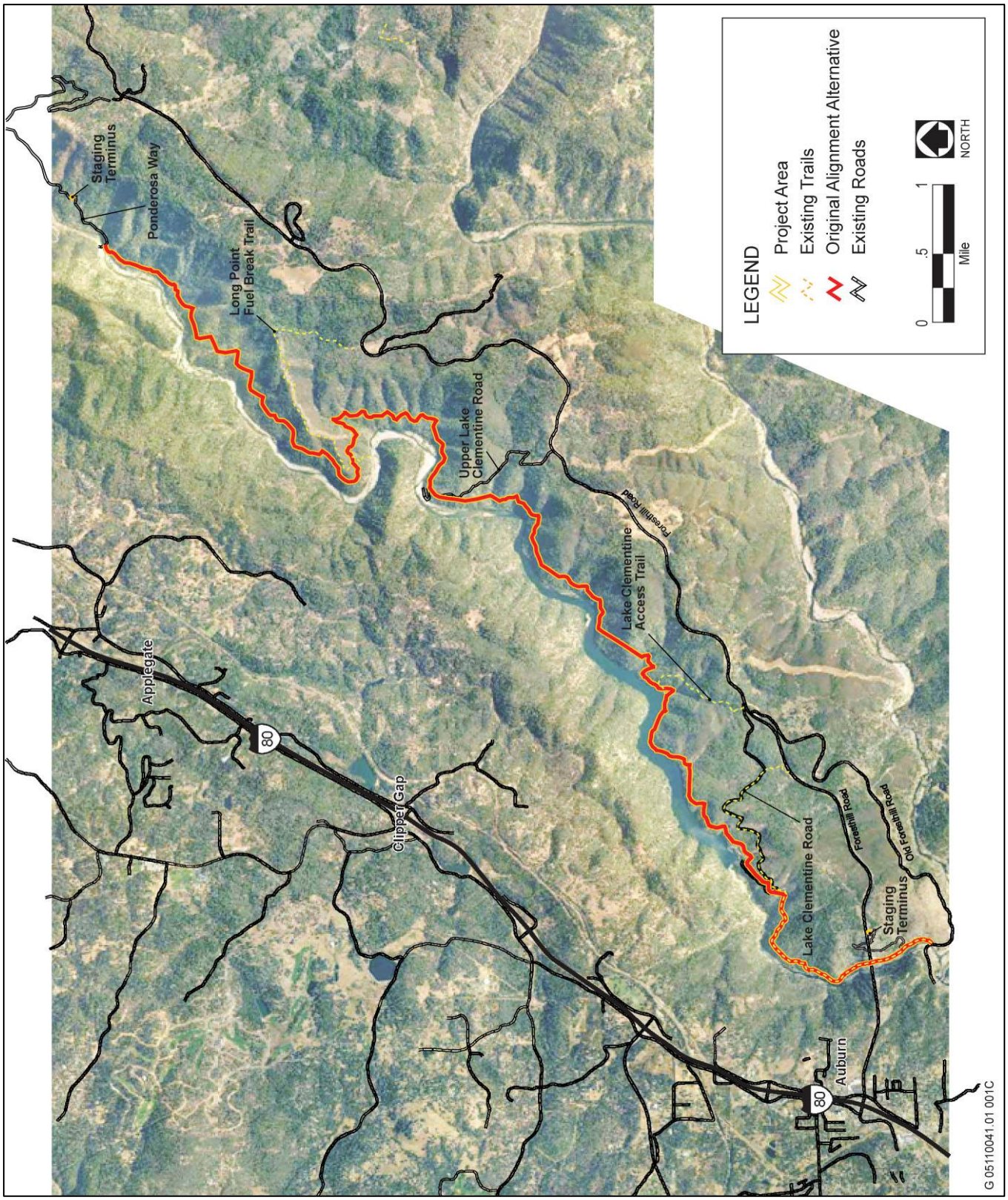
NO PROJECT ALTERNATIVE

The No Project Alternative assumes that the proposed trail and associated facilities, including the corresponding staging termini, would not be constructed. Existing trails in the surrounding area would continue to be used for recreation, and access and recreational opportunities would be limited in the project area. The project area would continue to be managed under Reclamation contract by the California Department of Parks and Recreation (State Parks) according to the *Auburn State Recreation Area Interim Resource Management Plan* (Auburn SRA IRMP) and the revised Auburn SRA General Plan (GP)/IRMP.

This alternative would not meet the demand for recreational facilities in Placer County, specifically hiking, mountain biking, and equestrian trails along the North Fork American River. Because no trail would be constructed under this alternative, the impacts associated with the proposed project on land use; biological resources; cultural resources; visual resources; transportation and circulation; air quality; noise; soils, geology, and seismicity; hydrology and water quality; public services; recreation; and hazardous materials and hazards would not occur. Because the proposed project would not have an impact on population, employment, housing, public utilities, or mineral resources, impacts on these resource areas under the No Project Alternative would be similar to those under the proposed project.

ORIGINAL ALIGNMENT ALTERNATIVE

Under the Original Alignment Alternative, as proposed in the IS/EA for the North Fork American River Trail, the trail would follow the same alignment as the proposed project, except for a portion of the proposed trail near Upper Lake Clementine Road. Under the Original Alignment Alternative, the trail would follow the canyon contour around the river bend upstream of Lake Clementine. This segment of trail would not climb higher up the canyon than it would for the proposed project, and it would not include switchbacks (Exhibit 16-3). This alternative would cross steeper slopes that are more susceptible to high erosion than the proposed project. This alternative would also cross private property. Therefore, the proposed project is preferred over the Original



Source: Placer County 2006

Original Alignment Alternative **Exhibit 16-3**

Alignment Alternative, because it would have reduced impacts on geology and soils and water quality and would not cross private property.

Land Use and Agricultural Resources

The Original Alignment Alternative would be consistent with the *Placer County General Plan*, the *Weimar-Applegate-Clipper Gap General Plan*, the Placer County Zoning Ordinance, the Auburn SRA IRMP, and the *Placer County Trails Master Plan*. This alternative would not divide an established community, nor would it affect agricultural and timber resources or operations. There is no habitat conservation plan or natural community conservation plan currently in effect for the project area. The lands within the project area are not currently being used for agricultural purposes. Because of the existing topography, the area does not possess high value for agriculture and it is not expected to be used for farming or grazing in the future. Therefore, the Original Alignment Alternative would not result in the loss of any agricultural resources or the conversion of farmland to nonagricultural uses. Because the Original Alignment Alternative would not conflict with any land use plans in the project area and would not convert any farmland to non-agricultural uses, it would have a less-than-significant impact on land use, planning, and agricultural resources in the project area. The impacts of the Original Alignment Alternative on land use, planning, and agricultural resources would be similar to those of the proposed project.

Population, Employment, and Housing

The Original Alignment Alternative would not involve the construction of new homes or businesses or the extension of roads or infrastructure. This alternative would not displace any existing housing, nor would it result in the disruption or division of an established community. Primarily mechanized construction techniques would be used to construct the proposed trail; therefore, this alternative would require very few workers and would have very little effect on the local workforce. This alternative would have no effect on population, employment, or housing. The impacts of the Original Alignment Alternative on population, employment, and housing would be similar to those of the proposed project.

Biological Resources

With implementation of mitigation, the Original Alignment Alternative would not substantially affect any threatened or endangered species. This alternative trail alignment would not be constructed in an area designated as important deer habitat. This alternative would have minor effects on the 48 drainages in the project area. The Original Alignment Alternative would require the removal of a few large trees and would have the potential to introduce invasive weeds. This alternative would include mitigation to reduce impacts on special-status species and waters of the United States and to prevent introduction of invasive weeds. With implementation of these mitigation measures, the Original Alignment Alternative would have a less-than-significant impact on biological resources. The impacts of the Original Alignment Alternative on biological resources would be similar to those of the proposed project.

Cultural Resources

There are six potentially significant cultural resources immediately adjacent to the trail alignment proposed under the Original Alignment Alternative. The project area also contains numerous historic and prehistoric cultural resources, and undocumented cultural resources are likely to exist in the project area. This alternative would include mitigation measures to reduce impacts on known and yet-to-be-discovered cultural resources. With implementation of these mitigation measures, the Original Alignment Alternative would have a less-than-significant impact on cultural resources. The impacts of the Original Alignment Alternative on cultural resources would be similar to those of the proposed project.

Visual Resources

The Original Alignment Alternative would introduce new physical elements into the landscape; however, the trail alignment would be designed to avoid visually obtrusive effects. Limiting the trail width to 4 feet under this alternative would minimize visibility from above and from the other side of the river. Construction of the trail under this alternative would also avoid the removal of trees more than 6 inches in diameter at breast height, thus minimizing visible canopy reduction. Trail features incorporated into the Original Alignment Alternative would incorporate natural colors and materials to further blend with the surrounding environment. No new sources of light and glare would be introduced as part of this alternative. The Original Alignment Alternative would not affect any scenic vistas. Therefore, the Original Alignment Alternative would have a less-than-significant impact on visual resources. The impacts of the Original Alignment Alternative on visual resources would be similar to those of the proposed project.

Transportation and Circulation

Construction of the trail under the Original Alignment Alternative would temporarily increase traffic in the project area during construction. Trail use and maintenance under this alternative would also slightly increase traffic in the project area. The increase in traffic from trail construction or use and maintenance would not be substantial in relation to the existing traffic load and the capacity of nearby roadways. Adequate parking would be provided for trail users under this alternative. Therefore, the Original Alignment Alternative would have a less-than-significant impact on transportation and circulation. The impacts of the Original Alignment Alternative on transportation and circulation would be similar to those of the proposed project.

Air Quality

Trail construction under the Original Alignment Alternative would temporarily increase concentrations of reactive organic gases (ROG), oxides of nitrogen (NO_X), and respirable particulate matter with an aerodynamic diameter of 10 micrometers or less (PM_{10}) in the project area. Trail construction under this alternative would also have the potential to temporarily increase the amount of diesel exhaust and fuel vapors in the project area. Long-term operation (use and maintenance) of the trail as part of this alternative would not cause a significant increase in ROG, NO_X, or PM_{10}. It is unlikely that construction of the trail under this alternative would expose areas containing asbestos. Mitigation would be included to address this issue, if necessary. Therefore, the Original Alignment Alternative would have a less-than-significant impact on air quality with implementation of mitigation. The impacts of the Original Alignment Alternative on air quality would be similar to those of the proposed project.

Noise

Trail construction under the Original Alignment Alternative would temporarily increase noise levels in the project area. Construction activities associated with this alternative would comply with the requirements of the Placer County Noise Ordinance, and the closest noise-sensitive receptors are 2 miles away. Long-term operation (use and maintenance) of the trail under this alternative would not cause a significant increase in noise levels in the project area. Therefore, the Original Alignment Alternative would have a less-than-significant impact on noise levels in the project area. The impacts of the Original Alignment Alternative on noise levels would be similar to those of the proposed project.

Soils, Geology, and Seismicity

Trail construction under the Original Alignment Alternative would require some vegetation removal and would result in soil disturbance and minor alterations to surface topography, which would result in some erosion. Some portions of the trail alignment under the Original Alignment Alternative would be located on steep slopes, which could also cause soil erosion. This trail alignment would not be located within an earthquake fault zone and no structures for human occupancy would be placed across any fault trace. The Original Alignment Alternative

would not result in the loss of known mineral resources, nor would it interfere with existing or future mineral extraction operations. Impacts of the Original Alignment Alternative on soils, geology, and seismicity would be less than significant, but would be worse than the proposed project. Implementation of the proposed project would avoid some of the steep slopes that could cause erosion; therefore, the proposed project would have less impact on soils, geology, and seismicity than the Original Alignment Alternative.

Mineral Resources

The Original Alignment Alternative would not result in the loss of any known mineral resources as identified by the California Geological Survey or the California Division of Mines and Geology (CDMG 1988, California Geological Survey 2004). (It should be noted that the California Division of Mines and Geology changed its name to the California Geological Survey in 2002.) The Original Alignment Alternative would not impede or interfere with the establishment or continuation of existing mineral extraction operations. It would not result in the loss of available known mineral resources that would be of value to the region or residents of the state, and the site is not delineated as a locally important recovery site in the *Placer County General Plan*, the *Weimar-Applegate-Clipper Gap General Plan*, *Foresthill Divide Community Plan*, or the *Auburn State Recreation Area Interim Resource Management Plan*. The impacts of the Original Alignment Alternative on mineral resources would be similar to those of the proposed project.

Hydrology and Water Quality

Implementation of the Original Alignment Alternative would not affect groundwater in the project area, and this alternative would comply with policies pertaining to water quality in the *Placer County General Plan*, the *Weimar-Applegate-Clipper Gap General Plan*, and the Auburn SRA IRMP. However, potential erosion from vegetation removal and construction on steep slopes could affect water quality in the project area. Best management practices would be implemented to reduce this impact to a less-than-significant level. Therefore, the Original Alignment Alternative would have a less-than-significant impact on water quality and hydrology in the project area. However, the trail alignment under the proposed project would avoid some steep slopes that could contribute to erosion. Therefore, the proposed project would have less impact on water quality than the Original Alignment Alternative.

Public Services and Utilities

Implementation of the Original Alignment Alternative would not result in the need for a significant increase in fire protection, sheriff protection, schools, or other public facilities. The public services currently provided to the Auburn SRA would be sufficient to accommodate the trail proposed under this alternative. The Original Alignment Alternative would not have components that would require electricity or communication, wastewater treatment, sewer, septic, or water supply systems. Under this alternative solid waste would be collected and disposed of by the current solid waste collection contractor that serves the Auburn SRA. Therefore, the Original Alignment Alternative would have a less-than-significant impact on public services and utilities. The impacts of the Original Alignment Alternative on public services and utilities would be similar to those of the proposed project.

Recreation

The Original Alignment Alternative would assist in meeting the existing demand for more recreational opportunities. This alternative would not increase the demand for more parks or facilities, nor would it negatively affect existing recreational opportunities. Therefore, the Original Alignment Alternative would have a less-than-significant impact on recreation. The impacts of the Original Alignment Alternative on recreation would be similar to those of the proposed project.

Hazardous Materials and Hazards

The Original Alignment Alternative would not be located in a Wildland Area or Fire Hazard Severity Zone as designated by the California Department of Forestry and Fire Protection (CDF 2000); however, the project area is identified as an extreme fire hazard area by the *Weimar-Applegate-Clipper Gap General Plan* (Placer County 1980). Cut vegetation would be chipped and broadcast to reduce the risk of wildfire under this alternative. There is the potential for fire to occur during construction from equipment and after construction by trail users (e.g., from discarded cigarette butts or illegal campfires). The potential also exists for small amounts of hazardous materials to be released from construction equipment under this alternative. Fire prevention measures and measures for proper storage and handling of hazardous materials would be incorporated into the Original Alignment Alternative to reduce these impacts to a less-than-significant level. Therefore, the Original Alignment Alternative would have a less-than-significant impact on hazards and hazardous materials. The impacts of the Original Alignment Alternative on hazards and hazardous materials would be similar to those of the proposed project.

16.1.3 SUMMARY OF ALTERNATIVES ANALYSIS

A comparison of the proposed project, the No Project Alternative, and the Original Alignment Alternative is presented in Table 16-1 below. This table shows the advantages and disadvantages of the No Project Alternative and the Original Alignment Alternative relative to the proposed project.

Table 16-1
Summary of Alternatives Analysis

Issue Area	Proposed Project	No Project (Alternative 1)		Original Alignment (Alternative 2)	
Land Use	Less than significant	No impact	❑	Less than significant	★
Population, Employment, and Housing	No impact	No impact	★	No impact	★
Biological Resources	Less than significant	No impact	❑	Less than significant	★
Cultural Resources	Less than significant	No impact	❑	Less than significant	★
Visual Resources	Less than significant	No impact	❑	Less than significant	★
Transportation and Circulation	Less than significant	No impact	❑	Less than significant	★
Air Quality	Less than significant	No impact	❑	Less than significant	★
Noise	Less than significant	No impact	❑	Less than significant	★
Soils, Geology, and Seismicity	Less than significant	No impact	❑	Less than significant[1]	■
Hydrology and Water Quality	Less than significant	No impact	❑	Less than significant[1]	■
Public Services	Less than significant	No impact	❑	Less than significant	★
Public Utilities	No impact	No impact	★	No impact	★
Recreation	Less than significant	Potentially significant	■	Less than significant	★
Hazardous Materials and Hazards	Less than significant	No impact	❑	Less than significant	★

Key:
■ Proposed project is environmentally advantageous compared to the alternative
❑ Alternative is environmentally advantageous compared to the proposed project
★ No clear environmental advantage exists between the alternative and the proposed project
[1] Although these impacts would be less than significant under the proposed project and the Original Alignment Alternative, the proposed project is environmentally advantageous compared to the Original Alignment Alternative in these areas, because it would have reduced erosion and water quality issues compared to the Original Alignment Alternative.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The environmentally superior alternative would be the No Project Alternative; however, according to the State CEQA Guidelines, if the environmentally superior alternative is the No Project Alternative, an environmentally superior alternative must be selected from the other alternatives. The environmentally superior alternative among the other alternatives is the proposed project. The proposed project would be environmentally superior to the Original Alignment Alterative with regard to soils, geology, and seismicity, and hydrology and water quality.

16.2 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED

CEQA Section 21100(b)(2)(A) provides that an EIR shall include a detailed statement setting forth "[i]n a separate section… [a]ny significant effect on the environment that cannot be avoided if the project is implemented." State CEQA Guidelines Section 15126.2(b) requires that an EIR describe any significant impacts, including those that can be mitigated but not reduced to a level of insignificance. Chapters 4.0 through 15.0 of this DEIR provide descriptions of the potential environmental effects of the proposed project for all applicable environmental topic areas, as well as mitigation measures to mitigate project effects to the extent feasible. Cumulative impacts of the proposed project are discussed in Section 16.5 below. Implementation of the proposed mitigation measures would reduce all of the identified significant impacts to less-than-significant levels. Therefore, the proposed project would not result in any significant unavoidable effects on the environment.

16.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Section 21100(b)(2)(B) provides that an EIR shall include a detailed statement setting forth "[i]n a separate section… [a]ny significant effect on the environment that would be irreversible if the project is implemented." State CEQA Guidelines Section 15126.2(c) provides the following guidance for an analysis of significant irreversible changes of a project:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible because a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

As discussed in Chapter 3.0, "Project Description," initial vegetation clearing along the proposed trail alignment would be performed by hand. A 6-foot-wide area would be cleared, but the area cleared could be up to approximately 15 feet where needed to promote safe lines of sight. The proposed trail alignment would be cleared of vegetation to a height of 10 feet to accommodate equestrian use.

Both hand and mechanical construction techniques would be used to construct the proposed trail. The proposed project would include construction of ancillary features such as retaining walls, creek fords, staging termini, and bridges at four stream crossings.

The tread width of the proposed trail alignment would be generally 6 feet; full-bench construction techniques would be used. The trail width would vary as needed based on geologic and safety conditions. The trail tread would be excavated using a Sweco trail dozer, mini excavator, hand construction, and/or other machinery.

The proposed project would enhance access to an open, relatively remote area that had more limited access for recreational users in the past. The proposed project is a relatively small scale trail that could be restored to a

natural condition in the future, if desired by the County or State Parks. Therefore, the environmental effects associated with trail construction could be reversed in the future, which indicates the effects are not irreversible.

Implementing any of the alternatives would require irretrievable commitments of both renewable and nonrenewable energy and material resources for clearing of the proposed trail alignment and construction of related project elements. As described in Chapter 3.0, "Project Description," these activities would require use of construction equipment that uses petroleum fuels, such as gasoline and diesel. This temporary energy expenditure would occur over the short term and would not substantially increase the overall demand for electricity or natural gas. Nevertheless, construction of the proposed trail would result in an incremental increase in consumption of fossil fuels and use of construction materials, including timber, concrete, fiberglass, steel, or composite material.

Resources in the form of construction materials and labor, fuels, and other energy sources for vehicles and equipment would also be committed with the implementation of all the other alternatives except for the No Project Alternative.

16.4 GROWTH-INDUCING EFFECTS

CEQA Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an EIR. Section 15126.2(d) of the State CEQA Guidelines states that a proposed project is growth-inducing if it could "foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." Direct growth inducement would result if a project involved, for example, the construction of new housing. Indirect growth inducement would result if a project established substantial new permanent employment opportunities (e.g., new commercial, industrial, or governmental enterprises), involved a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services, or removed an obstacle to housing development. Examples of growth-inducing actions include developing water, wastewater, fire, or other types of service areas in not previously served, extending transportation routes into previously undeveloped areas, and establishing major new employment opportunities.

The proposed project would involve construction of a multiple-use trail along the North Fork American River within the undeveloped, open space, recreational setting of the Auburn SRA. Implementation of the proposed project would occur in stages (see Chapter 3.0, "Project Description"), and the work would be performed by one or more crews from the California Conservation Corps, inmate crews, licensed contractors, volunteers, and/or County staff whose work would be overseen by State Parks. These activities would generate short-term employment opportunities; however, the work would be temporary and would occur over a 3-year period, with certain activities starting and stopping for shorter durations within this time period. Because of the limited number and type of new jobs that would be generated and the temporary nature of those jobs, it is anticipated that the new jobs would be filled using the existing local employment pool. Existing available housing in the region would easily accommodate any workers who relocate from outside the area, if needed. No new staff would be required to manage or maintain the trail; existing County staff would manage the trail and trail uses in coordination with State Parks, with assistance from local volunteers and organized recreation groups (e.g., International Mountain Bicycling Association). No new long-term (i.e., full-time) jobs would result from the proposed project. For these reasons, indirect growth-inducing impacts resulting from implementation of the proposed project are considered less than significant.

The proposed project would occur on land that is managed by State Parks under a cooperative agreement funded by the U.S. Bureau of Reclamation (Reclamation). These properties are managed by State Parks for open space and recreational uses. The proposed project is consistent with the purposes for which the Auburn SRA was established. Construction and operation (use and maintenance) of the proposed trail would not involve construction of housing, nor would it involve extension of public services facilities or development of a service area; therefore, the proposed project would not result in direct growth-inducing effects, and no impact would occur.

A slight increase in economic growth may be realized from the proposed project. Construction of the proposed trail would increase the capacity and quality of the regional trail system, which may draw more people to recreate in the project area. By stimulating visitation for recreational activities, the proposed trail would also be expected to result in a slight increase in related recreational spending levels. This is anticipated to lead to a minor, long-term increase in local economic activity. Such economic benefits would likely be concentrated in the sectors of the local business community that serve recreationists, specifically trail users. The proposed trail could also generate an increase in fee revenues collected by State Parks for its various recreation facilities in the Auburn SRA based on a general increase in visitation to this park unit; however, the proposed trail would be free to the public. Effects on the local economy would be minimal, resulting in no significant growth-inducing effects.

16.5 CUMULATIVE IMPACTS

Section 15130 of the State CEQA Guidelines requires that an EIR discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." According to State CEQA Guidelines Section 15065, "Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects as defined in Section 15130." Sections 15130 and 15355 of the State CEQA Guidelines both stress cumulative impacts in the context of closely related projects and from projects causing related impacts.

The term "considerable" is subject to interpretation. The standards used herein to determine whether an effect is considerable are that either the impact of the proposed project would contribute in any manner to the existing significant cumulative impact, or the cumulative impact would exceed an established threshold of significance when the proposed project's incremental effects are combined with similar effects from other projects.

State CEQA Guidelines Section 15130(b) directs the crafting of an adequate discussion of cumulative impacts:

> The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

A cumulative analysis may employ either of two methods for evaluating cumulative impacts; this EIR uses the list method in accordance with Section 15130(b)(1)(A) of the State CEQA Guidelines, which allows the lead agency to consider "past, present, and probable future projects producing related or cumulative impacts…." The environmental influences of past projects and present projects that have been implemented already exist as a part of current conditions in the project area. Therefore, the contributions of past and present projects to environmental conditions are adequately captured in the description of the existing setting and need not be specifically listed here. This cumulative impact analysis focuses on the potential cumulative physical changes to the existing setting that could occur as a result of a combination of this proposed trail project and probable future projects.

16.5.1 CAPITAL-TO-CAPITAL TRAIL CONCEPT

In the 1960s, the idea of a continuous Capital-to-Capital (or "Cap-to-Cap") Regional Trail from Sacramento to Carson City, Nevada was introduced. However, plans for implementation of this ambitious trail concept have not been developed or advanced, and several barriers to its development have been identified. There have been no specific proposals submitted for further development of this concept by any agencies with jurisdiction over the Cap-to-Cap route. There has been no funding identified or proposals to locate funding for development of this concept. Currently, there has been no physical alignment proposed for the Cap-to-Cap trail concept and; therefore, it would be too speculative at this time to attempt to evaluate potential impacts associated with this concept. Because of the speculative nature of the Cap-to-Cap trail concept, and the lack of any specific proposal for its

development, it is not considered reasonably foreseeable, probable future project and, therefore, is not among the projects included in this cumulative project analysis. An overview of the history of the Cap-to-Cap trail concept is included in this section for informational purposes.

County staff began meeting with the primary land management agencies that had jurisdiction over the area between Sacramento and Carson City to discuss the feasibility of implementing this concept. Additional meetings with trail user groups were conducted to gauge interest and to gain support for the idea. As momentum increased and some funding sources were tentatively identified, the County entered into negotiations with Reclamation and State Parks because portions of the conceptual route would cross both the Auburn SRA and the Folsom SRA. (State Parks has operating agreements to manage both recreation areas on behalf of Reclamation). As a result of these negotiations, State Parks identified a number of concerns about the trail concept:

- potential user conflicts resulting from the different allowable uses on the proposed trail,
- poor condition of existing trails along the route,
- proximity of the proposed trail alignment to the river,
- the need for future maintenance of the trail, and
- identification of a common vision for the trail among the involved agencies.

The County originally identified construction of a new section of trail from the confluence to the Ponderosa Bridge in the Auburn SRA (i.e., the proposed project) as a potential "Phase 1" of the Cap-to-Cap trail concept. In subsequent meetings with State Parks, the County modified the original proposal to address many of State Parks's concerns by:

- acknowledging that State Parks and Reclamation would need to approve the trail alignment,
- agreeing that some separation between the trail and river would be necessary,
- agreeing that the North Fork Trail be developed and constructed as a stand-alone trail,
- agreeing on a plan for future maintenance of the trail, and
- agreeing to assist with the assessment of trail repairs needed on existing trails along the proposed Cap-to-Cap trail route (Placer County 2003a).

The County agreed to design the trail section from the confluence to the Ponderosa Bridge to function as a stand-alone trail segment with adequate parking and staging termini that would connect to existing trails. Under these conditions, State Parks agreed to explore development of the North Fork American River Trail from the confluence to the Ponderosa Bridge.

The Cap-to-Cap Trail remains a concept and not a reasonably foreseeable, probable future project. Many barriers to precisely defining and considering the completion of such a trail in the upper portions of the North Fork American River canyon have been identified. These barriers include lack of funding (no funding sources have been confirmed), private land ownership along portions of potential routes, extreme topography along portions of the potential routes, and potential incompatibility with Wild and Scenic River and Wilderness designations. Based on the results of past discussions, State Parks has indicated that developing a trail from the confluence to the Ponderosa Bridge as a stand-alone project is appropriate recognizing the feasible topography and other physical characteristics along the proposed trail alignment, on preliminary assessments indicating that such a trail is compatible with existing uses in this portion of the canyon, and on indications that the stand-alone trail project may be generally consistent with existing management plans for the area. State Parks has not decided to support the Cap-to-Cap concept and has not signed the County Memorandum of Understanding regarding the Cap-to-Cap concept because of the concerns listed above (Michaels, pers. comm., 2006). State Parks will not consider planning or defining any potential sections of trail in the North Fork American River canyon above the Ponderosa Bridge until the update for the Auburn SRA GP/IRMP has been completed. The Auburn SRA GP/IRMP is

currently being updated and scoping meetings are being held to get input on the document. The County is not undertaking any planning efforts or pursuing any funding sources for the Cap-to-Cap Trail.

16.5.2 OTHER RELEVANT PROJECTS

AMERICAN RIVER TRAIL (PROPOSED FUTURE PROJECT)

The American River Trail is a proposed multiple-use trail that would extend 8 miles along the South Fork American River from Salmon Falls Road at Folsom Lake to Greenwood Creek at State Route 49 near Coloma. The trail will be a multiple-use trail for hikers, bikers, and equestrians (El Dorado County 2005).

CONNECTOR TRAIL (EXISTING PROJECT)

The approximately 6.7-mile Connector Trail was constructed by the County several years ago. This trail connects the Lake Clementine Trail and the Foresthill Divide Loop Trail and is primarily a mountain bike trail. The Connector Trail starts on the north side of Foresthill Road near the proposed Foresthill Bridge Staging Terminus and proceeds to the northeast following the ridgeline of the Foresthill Divide. The trail connects to Lake Clementine Road and the Lake Clementine Access Trail, then continues on to where it connects to the Foresthill Divide Loop Trail.

16.5.3 CUMULATIVE IMPACTS

Cumulative impacts of the proposed project are evaluated separately for each environmental topic area addressed in this DEIR. Within each topic area, the cumulative impact analysis focuses on the potential cumulative physical changes to the existing setting that could occur as a result of a combination of the proposed project and probable future projects described above.

LAND USE

Chapter 4.0 identifies the effects of the proposed project on land use and planning. The proposed project would be consistent with the land uses and zoning of the project area, including the goals and policies of the Auburn SRA IRMP. Other existing and proposed trails in the project area are also consistent with land uses in the project area. Therefore, the proposed project, either alone or combined with other projects, would not have a significant cumulative effect on land use. The proposed project would not contribute to a significant cumulative effect on land use.

BIOLOGICAL RESOURCES

Chapter 5.0 identifies the effects of the proposed project on biological resources. The proposed project could affect foothill yellow-legged frog, raptors and other nesting birds, special-status plants, and waters of the United States. Construction of the proposed project could also introduce invasive weeds into the project area. The impacts of the proposed project on biological resources in the project area could be potentially significant cumulative effects.

Mitigation for the proposed project consists of establishing buffers around sensitive resources, conducting preconstruction surveys, obtaining and complying with terms of applicable permits, and taking measures to prevent the introduction of invasive weeds. The proposed project would implement site-specific mitigation consistent with regulations of the U.S. Fish and Wildlife Service, California Department of Fish and Game, and U.S. Army Corps of Engineers that would reduce these impacts to a less-than-significant level. Therefore, the incremental effect of the proposed project is not cumulatively considerable when considered with other past, present, and reasonably foreseeable projects. This impact would be less than significant.

CULTURAL RESOURCES

Chapter 6.0 identifies the effects of the proposed project on cultural resources. The proposed project has the potential to affect potentially significant cultural resources or to uncover unknown or undocumented subsurface cultural remains or human interments. The impacts of the proposed project on cultural resources in the project area are potentially significant and could be cumulatively considerable.

Mitigation for impacts of the proposed project includes aligning the proposed trail to avoid the potentially significant cultural resources, and halting construction immediately and notifying a qualified professional archaeologist of any discovery of cultural materials or human interments. The archaeologist would determine whether the resource is potentially significant as per the California Register of Historical Resources and would develop appropriate mitigation. If a Native American burial is discovered, California Health and Safety Code Sections 7050.5 and 7052 and California Public Resources Code Section 5097 would be complied with to ensure that the site is properly protected. Because the proposed project would implement site-specific mitigation consistent with the California Health and Safety Code and the California Public Resources Code, the incremental effect of the proposed project is not cumulatively considerable when considered with other past, present, and reasonably foreseeable projects. Therefore, the proposed project would not have a cumulatively considerable effect on cultural resources when considered with other past, present, and reasonably foreseeable projects. The proposed project would not contribute to a significant cumulative effect on cultural resources.

VISUAL RESOURCES

Chapter 7.0 identifies the effects of the proposed project on visual resources. As shown in the visual simulations (Exhibits 7-8 through 7-20), the proposed project would not be visible from any scenic vistas. The proposed project would not introduce any new sources of light and glare into the project area. Project features would incorporate natural colors and materials to the extent possible so that they would blend with the surrounding environment. Therefore, the proposed project would not have a cumulatively considerable effect on visual resources when considered with other past, present, and reasonably foreseeable projects. The proposed project would not contribute to a significant cumulative effect on visual resources.

TRANSPORTATION AND CIRCULATION

Chapter 8.0 identifies the effects of the proposed project on transportation and circulation. Construction and operation (use and maintenance) of the proposed trail would cause a slight increase in traffic in the project area. However, this increase in traffic would not be significant relative to the existing load and capacity of the surrounding roadways. The proposed project would provide adequate parking for trail users. Although the proposed trail and other existing and future trails in the project area would cause some increases in traffic, the majority of trail users would be visitors to the Auburn SRA who are currently making trips to the project area. Parking provided by the proposed project in combination with existing parking would be adequate for visitors to the project area. Therefore, the proposed project would not have a cumulatively considerable effect on transportation and circulation when considered with other past, present, and reasonably foreseeable projects. The proposed project would not contribute to a significant cumulative effect on transportation or circulation.

AIR QUALITY

Chapter 9.0 identifies the effects of the proposed project on air quality. The proposed project would result in construction-related effects on air quality, as trail construction would generate criteria pollutants such as NO_X, ROG, and PM_{10}. All construction activities within the air basin would contribute to current air quality violations similar to those of the proposed project. The air basin is in nonattainment status; however, the air quality effects of the proposed project would be minimal and temporary. Because air quality impacts associated with the proposed project would be minimal and it is assumed that other projects in the area would use mitigation as

necessary to reduce their impact on air quality, the project's incremental contribution to the significant cumulative effect is not cumulatively considerable.

Please refer to Chapter 9.0, "Air Quality," for information on greenhouse gas (GHG) emissions, global climate change, and regulatory information on this topic.

Implementation of the proposed project is expected to result in a slight temporary net increase in GHG emissions associated with short-term construction activities. Operation of the proposed project would also result in a slight net increase of GHG emissions associated with the slightly increased need for maintenance activities. Future trail visitors would consist primarily of existing trail users, and thus would not contribute a net increase in GHG emissions from vehicle trip emissions (see Impact 8-2, "Increase in Traffic with Use of the North Fork Trail," in Chapter 8.0, "Transportation and Circulation"). No stationary sources of GHG emissions would be associated with the project.

GHG emissions generated during construction and operation of the proposed project would predominantly be in the form of carbon dioxide (CO_2). In comparison to criteria air pollutants, such as ozone and PM_{10}, CO_2 and other GHG emissions persist in the atmosphere for a much longer period of time. While any increase in GHG emissions would add to the global inventory of gases that would contribute to global climate change, the proposed project would result in only very slight increases in GHG emissions from temporary or existing sources. The project's contribution to a net increase in GHG emissions would be less-than-considerable. This cumulative impact would be less than significant.

NOISE

Chapter 10.0 identifies the effects of the proposed project on noise. Noise levels associated with project construction could create a substantial temporary increase in ambient noise levels in the project area; however, these increases in noise levels would be temporary, and the closest noise-sensitive receptors are 2 miles away. The proposed project would also comply with the requirements of the Placer County Noise Ordinance. Therefore, the proposed project would not have a cumulatively considerable effect on noise levels when considered with other past, present, and reasonably foreseeable projects. The proposed project would not contribute to a significant cumulative effect on noise levels.

SOILS, GEOLOGY, AND SEISMICITY

Chapter 11.0 identifies the effects of the proposed project on soils, geology, and seismicity. Disturbance of topsoil and removal of vegetation during construction of the proposed project and steep slopes in the project area increase the potential for wind and water erosion. Although the proposed project would not include any structures for human occupancy, it involves construction of structures, such as the trail and bridges that could be subject to ground shaking, liquefaction, and landslides. These impacts on soils, geology, and seismicity in the project area are potentially significant and could be cumulatively considerable.

Mitigation for the proposed project would consist of preparing and implementing a storm water pollution prevention plan (SWPPP) that would include measures to control soil erosion and waste discharges from the project area. The construction contractor would also submit a notice of intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) for stormwater discharges associated with general construction activities. The proposed project would also implement measures to reduce the potential for exposure to seismic hazards. Because the proposed project would implement site-specific mitigation consistent with the Central Valley RWQCB program, the incremental effect of the proposed project is not cumulatively considerable when considered with other past, present, and reasonably foreseeable projects. The proposed project would not contribute to a significant cumulative effect on soils, geology, or seismicity.

HYDROLOGY AND WATER QUALITY

Chapter 12.0 identifies the effects of the proposed project on hydrology and water quality. The proposed project could result in temporary discharges of sediment and other contaminants in intermittent drainages in the project area. These intermittent drainages are ultimately discharged to the North Fork American River. Because some soil erosion and sedimentation in the project area could occur, this is a potentially significant impact on water quality. The contribution of the proposed project to water quality degradation in the project area could be a potentially significant cumulative effect.

As mentioned above under "Soils, Geology, and Seismicity," mitigation for the proposed project consists of preparing and implementing a SWPPP that would include measures to control soil erosion and waste discharges from construction areas. The construction contractor would also submit an NOI to the Central Valley RWQCB for stormwater discharges associated with general construction activities. Because the proposed project would implement site-specific mitigation consistent with the Central Valley RWQCB program, the incremental effect of the proposed project is not cumulatively considerable when considered with other past, present, and reasonably foreseeable projects. The proposed project would not contribute to a significant cumulative effect on water quality or hydrology.

PUBLIC SERVICES

Chapter 13.0 identifies the effects of the proposed project on public services. Use of the proposed trail could increase the demand for emergency services in the project area; however, this increased demand would be small and would not result in the need for a significant increase in emergency services. The proposed project would not have any effect on public utilities. Therefore, the proposed project would not contribute to any cumulative effect on public services or utilities when considered with other past, present, and reasonably foreseeable projects. The proposed project would not contribute to a significant cumulative effect on public services or utilities.

RECREATION

Chapter 14.0 identifies the effects of the proposed project on recreation. The proposed project could increase the chances for adverse human-wildlife interactions. The proposed project may also result in increased user conflicts in the project area. The proposed project would not cause an increase in the demand for more parks or recreational facilities, nor would it negatively affect existing recreational opportunities. Because the project would incorporate signage to educate users on these issues and because adverse human-wildlife interactions are rare, the proposed project would not contribute to any cumulative effect on recreation when considered with other past, present, and reasonably foreseeable projects. The proposed project would not contribute to a significant cumulative effect on recreation.

HAZARDOUS MATERIALS AND HAZARDS

Chapter 15.0 identifies the effects of the proposed project on hazardous materials and hazards. Sparks from construction and maintenance equipment, could generate fire risks in the project area, which has been identified as an extreme fire hazard area; trail users could also generate fire risks (e.g., from discarded cigarette butts). However, General Fire Prevention Requirements provided by the County Fire Captain would be implemented to reduce the risk of fire in the project area. Accidental spills of hazardous materials could occur during trail construction or maintenance. However, an accidental-spill prevention and response plan would be implemented, employees handling hazardous materials would be trained in safety measures, and an appropriate staging area for storage of hazardous materials would be identified. In addition, as mentioned above under "Soils, Geology, and Seismicity" and "Hydrology and Water Quality," a SWPPP would be prepared and implemented that would include measures to control soil erosion and waste discharges from construction areas, and the construction contractor would submit an NOI to the Central Valley RWQCB for stormwater discharges associated with general construction activities. Because the proposed project would implement this site-specific mitigation, the

incremental effect of the proposed project is not cumulatively considerable when considered with other past, present, and reasonably foreseeable projects. The proposed project would not contribute to a significant cumulative effect on hazardous materials and hazards.