CEQA FINDINGS OF FACT

and

STATEMENT OF OVERRIDING CONSIDERATIONS

OF THE CITY COUNCIL OF THE CITY OF ROSEVILLE

for the

DRY CREEK GREENWAY EAST TRAIL

February 2019

1 INTRODUCTION

The environmental impact report (EIR) prepared for the Dry Creek Greenway East Trail (project) addresses the potential environmental effects associated with constructing and operating a 4.25-mile paved multi-use trail along Dry, Cirby, and Linda Creeks from Riverside Avenue to Old Auburn Road. These findings have been prepared to comply with requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations Section 15000 et seq.). These findings refer to the Notice of Preparation (NOP) or Final EIR where the material appears in either of those documents. Otherwise, references are to the Draft EIR.

CEQA generally requires that a lead agency must take reasonable efforts to mitigate or avoid significant environmental impacts when approving a project. In order to effectively evaluate any potentially significant environmental impacts of a proposed project, an EIR must be prepared. The EIR is an informational document that serves to inform the agency decision-making body and the public in general of any potentially significant environmental impacts. The preparation of an EIR also serves as a medium for identifying possible methods of minimizing any significant effects and assessing and describing a reasonable range of potentially feasible alternatives to the project.

The EIR for this project was prepared by the City of Roseville (City) as the "lead agency" in accordance with CEQA and has been prepared to identify and assess the anticipated effects of the project. The City, as the lead agency, has the principal responsibility for approval of the project.

2 TERMINOLOGY OF FINDINGS

CEQA requires that, for each significant environmental effect identified in an EIR for a proposed project, the approving agency decision-making body must issue a written finding reaching one or more of the three allowable conclusions:

1. Changes or alterations which avoid or mitigate the significant environmental effects as identified in the EIR have been required or incorporated into the project;
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding, and such changes have been adopted by such other agency or can and should be adopted by such other agency; or
3. Specific economic, legal, social, technological, or other considerations, including consideration for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Draft EIR (PRC Section 21081, subds. (a)(1)–(a)(3); see also CEQA Guidelines, Section15091, subds. (a)(1)–(a)(3)).

For purposes of these findings, the terms listed below will have the following definitions:

- "Mitigation measures" shall constitute the "changes or alterations" discussed above.
- "Avoid" refers to the effectiveness of one or more mitigation measures to reduce an otherwise significant effect to a less than significant level.
- "Feasible," pursuant to the CEQA Guidelines, means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

- "Selected Project" refers to the Transportation Commission-recommended selection for the proposed trail alignment. This alignment is described and analyzed in the Draft and Final EIR as Alignment Option 5A.

3 PROJECT DESCRIPTION

3.1 PROJECT OVERVIEW

The Dry Creek Greenway East Trail is a proposed 4.25-mile paved multi-use trail in the City of Roseville (City). The project would be a shared-use trail for pedestrians, bicyclists, and other non-motorized vehicle users that would connect neighborhoods, parks, schools, businesses, natural areas, and the on-street bikeway system across the south side of the City. The proposed trail would extend from the existing Saugstad/Royer Park trail near the intersection of Riverside Avenue and Darling Way eastward to the City limits, just past the Old Auburn Road/South Cirby Way intersection. The trail would follow creek corridors along portions of Dry, Cirby, and Linda Creeks.

3.2 THE PROJECT

The selected project would be a paved, multi-use trail would that would conform to the City of Roseville Design Standards (Section 13 Bikeways) and other provisions of the City of Roseville Construction Standards. A typical cross-section for the proposed trail would consist of a 10-foot wide paved trail with two-foot shoulders on each side (one composed of decomposed granite and one of aggregate base), for a total width of 14 feet. The trail may also include drainage swales on one or both shoulders, as needed. The proposed trail may be narrowed to an eight-foot wide paved section with one- or two-foot wide shoulders for access spurs and in "pinch-point" locations that have severe physical or environmental constraints. The narrower cross section would still support safe, two-way travel but would limit physical disturbance where design constraints prevent construction of the standard cross-section. The proposed trail may also be widened in areas where additional shoulder or trail width is desired to enhance user comfort and safety. In these instances, the shoulder width may be increased to between 5 and 10 feet on one side of the trail. As a result of existing topography, retaining walls would be required at several locations along the proposed alignment. The proposed walls would include gravity walls (reinforced concrete) and anchored walls. The project would include undercrossings to pass beneath existing roadways, including Darling Way, Interstate 80 (I-80), Sunrise Avenue, Rocky Ridge Drive, and Old Auburn Road. The project would also include the construction or modification of up to eight bridges to provide creek crossings throughout the alignment. Finally, the project could include elements such as benches, lighting on lengthy portions of the undercrossings, utility relocations, and regulatory and wayfinding signs.

The selected project would, to the extent feasible, be designed to provide maintenance and emergency access for the City Environmental Utilities Department, open space and storm water maintenance crews, and the Roseville Fire Department. It would provide a safe route for walkers, joggers, cyclists, wheelchair users, and others traveling on non-motorized vehicles to access parks and other trails.

3.3 PROJECT SITE

The selected project would be located primarily within City-owned property zoned as Open Space with Floodway or Floodway Fringe Overlays. Small segments of the trail would also be located on property zoned for residential, commercial, and parks and recreation use with the Floodway or Floodway Fringe Overlays. While most of the project corridor is on public property, use of some privately-owned parcels

is necessary. Trail development is a permitted use in all of these zone districts. The project would be aligned within the creek corridors of developed neighborhoods and business districts in the City of Roseville. With the exception of a few scattered parcels, the properties surrounding the creek corridors are fully developed. The properties adjacent to the proposed trail corridor include a mix of residential, commercial, parks, open space and public/quasi-public uses. Flood control improvements, including floodwalls, berms, bypass channel, bypass culverts, and a detention basin are located along the length of the project from I-80, easterly to Old Auburn Road. A flood control bypass channel and detention basin are located along the south side of Linda Creek east of Rocky Ridge Drive and north of Cirby Way. Commercially zoned properties are concentrated along Sunrise Avenue to the north and south of the project site along Linda Creek. Commercial areas are also found near the western part of the proposed trail along Riverside Avenue between Darling and Cirby Ways.

3.4 PROJECT OBJECTIVES

The project objectives for the Dry Creek Greenway East Trail are developed in consideration of CEQA, the City of Roseville General Plan, 2008 Bicycle Master Plan, and the 2009 Dry Creek Greenway Planning and Feasibility Study. The project objectives are as follows:

- Develop a safe and continuous trail alignment that maximizes opportunities for bicycle and pedestrian travel separate from roadway vehicle traffic by connecting neighborhoods, shopping and employment, schools, parks, transit, and other existing and planned trails, bikeways and walkways.
- Enhance access to the Dry Creek, Cirby Creek, and Linda Creek open space areas for public recreational and educational opportunities, utility maintenance, open space maintenance, and emergency response.
- Protect the natural habitat and special-status wildlife species of the Dry Creek, Cirby Creek, and Linda Creek open space areas, minimize the potential for loss of life and property because of flooding, enhance compatibility with private properties, and reduce the need for right-of-way acquisition.
- Seek the most effective and efficient balance of capital cost, operational and maintenance costs, environmental and community impacts, and public benefits.

Direct consideration of cost is not required under CEQA. However, efforts to attain this objective are part of the design process employed by the City in meeting its health, welfare and economic obligations to the citizens of Roseville.

3.5 PROJECT CONSTRUCTION

Construction of the proposed multi-use trail would require removal of vegetation and existing features, grading, placement of aggregate base material, construction of five roadway undercrossings, construction or modification of up to eight bridges, and approximately 27,000 square feet of retaining walls.

The project would include construction staging areas where equipment would be temporarily stored during project construction. The construction staging areas would occur within the City's existing right-of-way or on property acquired by the City for the permanent trail alignment or temporary construction use.

A phasing plan would be developed for this project to provide a logical sequence of implementation for each identified phase. The phasing would consider aspects such as right-of-way requirements, environmental impacts, estimated capital costs and funding opportunities, and connectivity to key

nodes such as schools, parks, trailheads and neighborhoods. It was estimated that the project would be constructed in up to four phases over up to 4 years, commencing in 2021.

3.6 REQUIRED DISCRETIONARY ACTIONS

The City of Roseville is the lead agency for the project. As required by Section 15124(d)(1)(B) of the CEQA Guidelines, the EIR must contain a list of permits and other approvals required to implement the project. The project requires the following approvals:

- **EIR Certification.** Before the City can approve the project, the City Council must certify that the EIR was completed in compliance with the requirements of the CEQA, that the decision-making body has reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the City of Roseville. Approval of the project also requires adoption of a Mitigation Monitoring Plan, which specifies the methods for monitoring mitigation measures required to eliminate or reduce the project's significant effects on the environment. The City will also adopt CEQA Findings of Fact regarding any significant effects on the environment and, for any effects determined to be significant and unavoidable, a Statement of Overriding Considerations, as part of project approval. Action by the City Council follows a recommendation from the City of Roseville Transportation Commission. The City will file a Notice of Determination with the County Clerk and State Clearinghouse to conclude the CEQA process.
- **Trail project Approval.** After certification of the EIR, the City will consider approval of a trail alignment from the choices between the proposed alignment and its options. If the City approves a trail alignment, the City will also authorize staff to pursue final design, permitting, right-of-way acquisition, and construction funding for phased construction.

Several agencies would be involved in the consideration and approval of project elements. Federal, state, and regional agency approvals and permits that would be considered for the project would include wetlands verification, encroachment, water quality, and streambed alteration permits. State and regional responsible agencies and federal agencies with approval authority would include:

- Regional and State Responsible Agencies:
  - California Department of Fish and Wildlife
  - Central Valley Regional Water Quality Control Board
  - Central Valley Flood Protection Board
  - California Department of Transportation (Caltrans)
- Federal Agencies:
  - U.S. Army Corps of Engineers
  - U.S. Fish and Wildlife Service
  - National Oceanic and Atmospheric Administration Fisheries
  - Federal Highway Administration (NEPA authority delegated to Caltrans)

4 ENVIRONMENTAL REVIEW PROCESS

In accordance with PRC Section 21092 and CCR Section 15082, the City issued a Notice of Preparation (NOP) on November 18, 2013 to inform agencies and the general public that an EIR was being prepared and to invite comments on the scope and content of the document. The NOP was submitted to the State Clearinghouse, posted on the City of Roseville website (http://www.roseville.ca.us/transportation/bikeways/dc_study.asp), made available at the City clerk's office and the City of Roseville Permit Center, and distributed directly to potential responsible and trustee agencies. The NOP was circulated for 30 days, through December 19, 2013. In accordance with

PRC Section 21083.9 and CCR Section 15082(c), a noticed scoping meeting for the EIR occurred on December 3, 2013 at 6:00 p.m. at the Maidu Community Center, 1550 Maidu Drive, Roseville, California, 95661. The NOP and comment letters received on the NOP are included in Appendix A and Appendix B of the Draft EIR, respectively.

The Draft EIR was published on April 13, 2018. A CEQA Notice of Completion and copies of the Draft EIR were filed with the State Clearinghouse. A 45-day public review period for the Draft EIR was provided, ending on May 29, 2018. The Notice of Availability and the Draft EIR are posted on the City's website. A public hearing during the public comment period was held at the City of Roseville Transportation Commission meeting on May 21, 2018. In September 2018, the City published the Final EIR for the project. The Final EIR includes comments received on the Draft EIR, responses to issues raised in the comments, and revisions to the text of the Draft EIR. The Final EIR and the Draft EIR constitute the EIR for the project.

5 RECORD OF PROCEEDINGS

For the purposes of CEQA, and the findings herein set forth, the administrative record for the project consists of those items listed in PRC Section 21167.6, subdivision (e). The record of proceedings for the City's decision on the project consists of the following documents, at a minimum:

- The NOP and all other public notices issued by the City in conjunction with the project;
- The Draft EIR for the project and all documents relied upon or incorporated by reference;
- All comments submitted by agencies or members of the public during the 45-day comment period on the Draft EIR;
- The Final EIR for the project, including comments received on the Draft EIR; the City's responses to those comments; technical appendices; and all documents relied upon or incorporated by reference;
- The mitigation monitoring plan (MMP) for the project;
- All findings and resolutions adopted by the City in connection with the project, and all documents cited or referred to therein;
- The Transportation Commission staff report for May 21, 2018;
- Minutes and/or transcripts of the Transportation Commission public meeting held on May 21, 2018;
- The Transportation Commission staff report for December 18, 2018;
- Minutes and/or transcripts of the Transportation Commission meeting on December 18, 2018;
- The City Council staff report;
- Minutes and/or transcripts of the City Council public meeting held on March 20, 2019;
- All other reports, studies, memoranda, maps, staff reports, or other planning documents relating to the project prepared by the City or consultants to the City with respect to the City's compliance with the requirements of CEQA and with respect to the City's action on the project;
- All resolutions or findings adopted by the City regarding the project, and all staff reports, analyses, and summaries related to the adoption of those resolutions or findings;
- The City's General Plan and all updates and related environmental analyses;
- Relevant sections of the City's Zoning Code;
- Any documents expressly cited in these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by PRC Section 21167.6, subdivision (e).

Pursuant to Guidelines Section 15091(e), the administrative record of these proceedings is located at, and may be obtained from, the City's Development Services Department at 311 Vernon Street, Roseville, CA 95678. The custodian of these documents and other materials is the City Clerk.

The City Council has relied on all of the documents listed above in reaching its decisions on the project even if not every document was formally presented to the City Council or City Staff as part of the City files generated in connection with the project. Without exception, any documents set forth above not found in the project files fall into one of two categories. Many of them reflect prior planning or legislative decisions with which the City Council was aware in approving the project. (See *City of Santa Cruz v. Local Agency Formation Commission* (1978) 76 Cal.App.3d 381, 391-392; *Dominey v. Department of Personnel Administration* (1988) 205 Cal.App.3d 729, 738, fn. 6.) Other documents influenced the expert advice provided to City Staff or consultants, who then provided advice to the City Council as the final decision-making body.

For that reason, such documents form part of the underlying factual basis for the City Council's decisions relating to approval of the project. (See PRC, Section 21167.6, subd. (e)(10); *Browning-Ferris Industries v. City Council of City of San Jose* (1986) 181 Cal.App.3d 852, 866; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 153, 155.)

6 FINDINGS REQUIRED UNDER CEQA

PRC Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The same statute provides that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." Section 21002 goes on to provide that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in PRC Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. For each significant environmental effect identified in an EIR for a project, the approving agency must issue a written finding reaching one or more of three permissible conclusions. As noted earlier, the first such finding is that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. The second permissible finding is that such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding, and such changes have been adopted by such other agency or can and should be adopted by such other agency. The third potential conclusion is that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR (CEQA Guidelines Section 15091). PRC Section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors." CEQA Guidelines Section 15364 adds another factor: "legal" considerations.

The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417 (*City of Del Mar*); (*Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1506-1509 [court upholds CEQA findings rejecting alternatives in reliance on applicant's

project objectives]; see also *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001 *(CNPS) [*"an alternative 'may be found infeasible on the ground it is inconsistent with the project objectives as long as the finding is supported by substantial evidence in the record'"] (quoting Kostka & Zischke, *Practice Under the Cal. Environmental Quality Act* [Cont.Ed.Bar 2d ed. 2009] (*Kostka*), Section 17.309, p. 825); In *re Bay- Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165, 1166 (*Bay-Delta*) ["[i]n the CALFED program, feasibility is strongly linked to achievement of each of the primary program objectives"; "a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal"].) Moreover, "'feasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors." (*City of Del Mar*, *supra*, 133 Cal.App.3d at p. 417; see also *CNPS*, *supra,* 177 Cal.App.4th at p. 1001 *["an alternative that 'is impractical or undesirable from a policy standpoint' may be rejected as infeasible"*] [quoting Kostka, *supra,* Section 17.29, p. 824]; *San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 17.)

For purposes of these findings (including Table 2 as described below), the term "avoid" refers to the effectiveness of one or more mitigation measures to reduce an otherwise significant effect to a less-than-significant level. Although CEQA Guidelines Section 15091 requires only that approving agencies specify that a particular significant effect is "avoid[ed] *or* substantially lessen[ed]," these findings, for purposes of clarity, in each case will specify whether or not the effect in question has been "avoided" (i.e., reduced to a less-than-significant level).

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required, however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency (CEQA Guidelines Section15091, subd. (a), (b)).

The California Supreme Court has stated, "[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (*Goleta II*, *supra*, 52 Cal.3d at p. 576.)

The EIR identified two noise impacts as significant and unavoidable resulting from the selected project, and thus a Statement of Overriding Considerations has been prepared.

7 LEGAL EFFECT OF FINDINGS

These findings constitute the City's best efforts to set forth the evidentiary and policy bases for its decision to approve the selected project in a manner consistent with the requirements of CEQA. To the extent that these findings conclude that various mitigation measures outlined in the Final EIR are feasible and have not been modified, superseded or withdrawn, the City hereby binds itself to implement these measures. These findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when the City adopts a resolution approving the project.

8 MITIGATION MONITORING PLAN

A Mitigation Monitoring Plan (MMP) has been prepared for the selected project and is being approved by the City Council by the same Resolution that has adopted these findings. The City will use the MMP to track compliance with project mitigation measures. The MMP will remain available for public review during the compliance period. The MMP is found in Chapter 4 of the Final EIR and is approved in conjunction with certification of the EIR and adoption of these Findings of Fact.

9 SIGNIFICANT EFFECTS AND MITIGATION MEASURES

9.1 TABLE OF IMPACTS, MITIGATION MEASURES AND CEQA FINDINGS

The City Council's findings with respect to the selected project's significant effects and mitigation measures are set forth in the table attached to these findings ("Table 2"). The findings set forth in the table are hereby incorporated by reference and the Council adopts all of the mitigation measures identified therein. This table does not attempt to describe the full analysis of each environmental impact contained in the EIR. Instead, the table provides a summary description of each impact, describes the applicable mitigation measures identified in the Draft or Final EIR and adopted by the City Council, and states the City Council's findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the Draft and Final EIRs, and these findings hereby incorporate by reference the discussion and analysis in those documents supporting the EIR's determinations regarding mitigation measures and the selected project's impacts and mitigation measures designed to address those impacts. In making these findings, the City Council ratifies, adopts, and incorporates into these findings the analysis and explanation in the Draft and Final EIRs, and ratifies, adopts, and incorporates in these findings the determinations and conclusions of the Draft and Final EIRs relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

9.2 MITIGATION MEASURES PROPOSED BY COMMENTERS

One comment letter suggested a revision to the measures recommended in the Draft EIR. In considering specific recommendations from commenters, the City has been cognizant of its legal obligation under CEQA to substantially lessen or avoid significant environmental effects to the extent feasible. The City, in determining whether to accept such suggestions, either in whole or in part, has considered the following factors, among others: (i) whether the suggestion relates to an environmental impact that can already be mitigated to less-than-significant-levels by proposed mitigation measures in the Draft EIR; (ii) whether the proposed language represents a clear improvement, from an environmental standpoint, over the draft language that a commenter seeks to replace; (iii) whether the proposed language is sufficiently clear as to be easily understood by those who will implement the mitigation as finally adopted; (iv) whether the language might be too inflexible to allow for pragmatic implementation; (v) whether the suggestions are feasible from an economic, technical, legal, or other standpoint; and (vi) whether the proposed language is consistent with the project objectives. City staff and consultants spent time carefully considering and weighing requested mitigation language. In this instance, the City revised Mitigation Measure 4.4-2 , while also developing additional language addressing the same issue that was of concern to a commenter. The revisions are included in the Final

EIR in Response to Comment 5-2 in Chapter 2 (Comments and Responses) and in Chapter 3 (Revisions to the Draft EIR).

10 FINDINGS REGARDING RECIRCULATION OF THE DRAFT EIR

The City Council adopts the following findings with respect to whether to recirculate the Draft EIR. Under Section 15088.5 of the CEQA Guidelines, recirculation of an EIR is required when "significant new information" is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. The term "information" can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that (CEQA Guidelines Section 15088.5):

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The above standard is "not intend[ed] to promote endless rounds of revision and recirculation of EIRs." (*Laurel Heights Improvement Assn. v. Regents of the University of California* (1993) 6 Cal. 4th 1112, 1132.) "Recirculation was intended to be an exception, rather than the general rule." (*Ibid.*)

The City Council recognizes that the Final EIR contains responses to comments received, the MMP, and modifications to the Draft EIR. As noted above, one comment on the Draft EIR resulted in revisions to a mitigation measure. However, this revision is merely a clarification of an existing mitigation measure. The information contained within the Final EIR involves no "significant new information" triggering recirculation because the information did not result in any new significant environmental effects or any substantial increase in the severity of any previously identified significant effects, and did not otherwise trigger recirculation. Under such circumstances, the City finds that recirculation of the EIR is not required.

11 PROJECT ALTERNATIVES

11.1 BASIS FOR ALTERNATIVES

As discussed previously, CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required, however, where significant

environmental impacts will not occur. As is evident from the text of the EIR and the attached table describing the disposition of the significant effects of the project, most significant effects of the selected project have been avoided (that is, rendered less than significant) by the adoption of feasible mitigation measures. There are only two impacts that remain significant and unavoidable.

Under CEQA, project alternatives are developed in order to give agency decision-makers options for reducing or eliminating significant environmental effects of proposed projects while still meeting most, if not all, of the basic project objectives. "Alternatives and mitigation measures have the same function – diminishing or avoiding adverse environmental effects." (*Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 403.) The City Council sets forth below its reasons for concluding that all such alternatives are infeasible within the meaning of CEQA.

11.2 ALTERNATIVES CONSIDERED AND DISMISSED FROM FURTHER CONSIDERATION

As noted previously, the purpose of an alternatives analysis is to develop alternatives to a proposed project that substantially lessen at least one of the significant environmental effects identified as a result of the project, while still meeting most, if not all, of the basic project objectives. The State CEQA Guidelines state that an EIR should identify alternatives that were initially considered by the lead agency but were rejected as infeasible and explain the reasons for the determination (Section 15126.6[c]). As described in the Draft EIR, the City conducted an extensive planning process and consideration of alternatives for the project, as reported in the 2009 *Dry Creek Greenway Planning and Feasibility Study*. For planning purposes, the path alignment was initially divided into twelve segments, numbered from west to east. The alternatives analysis considered 30 different creek crossing alternatives and ultimately eliminated 12 creek crossings from consideration. The 18 remaining creek crossings were carried forward to the next stage of project planning.

The 2009 *Dry Creek Greenway Planning and Feasibility Study* outlined the existing conditions, opportunities and constraints, alignment options, evaluation criteria, and a recommended alignment for a paved multi-use trail from Riverside Avenue and Darling Way to the City limits just south of Old Auburn Road. The Stakeholder Representative Group (SRG) selected a preferred alignment based on criteria that included consideration of property owners, path users, public safety, environmental concerns, and municipal operations. There were two segments of the trail where the SRG did not reach a consensus on a recommended alignment. These were referred to as Segment 1 – Hillcrest and Segment 5 – Sunrise Avenue in the feasibility study. Segment 1 is the first portion of the proposed trail between the end of the Saugstad/Royer Trail at Darling Way to the area south of Machado Lane, west of the I-80 underpass. Segment 5 is located in the Cirby Side neighborhood to the east and west of Sunrise Avenue. Segment 5 begins near the Cirby Creek/Linda Creek confluence west of Sunrise Avenue to just east of the Sunrise Avenue bridge near the Meadow Gate connection. Four alignment options were identified for Segment 1 (1A, 1B, 1C, and 1D) and three alignment options were identified for Segment 5 (5A, 5B, and 5C).

The City then conducted an Alternatives Analysis in 2012 and 2013 to provide further information regarding alternative trail alignment options. Each of the alignment options were evaluated using criteria developed during for the 2009 *Planning and Feasibility Study*, in conjunction with the SRG, and based on the ability of each option to meet the project goals and objectives, as well as the feasibility criteria. A matrix was used to compare benefits, constraints, advantages, and disadvantages of each option. During this process, two of the options, Alternative 1D and Alternative 5C, were dismissed from further evaluation. The remainder of the alternative trail alignment options were carried forward. Options 1B and 5B were incorporated into the project; Options 1A, 1C, and 5A are referred to as alignment options in the EIR and are described below and analyzed at an equal level of analysis in each technical section of the EIR.

11.3 ALTERNATIVES CONSIDERED IN THE EIR

The alternatives analyzed in the Draft EIR are briefly described below.

- No Project Alternative
- Option 1A Alternative Alignment
- Option 1C Alternative Alignment
- Option 5A Alternative Alignment

11.3.1 No Project Alternative

DESCRIPTION

Under the No Project Alternative, the Dry Creek Greenway East Trail would not be constructed. The creek corridors along portions of Dry, Cirby, and Linda creeks would continue to contain segments of existing unimproved, natural-surface paths and paved multi-use paths, some of which do not meet current City design standards. Proposed retaining walls in areas susceptible to slumping would not be constructed, other bank stabilization elements would not be constructed, and access to the creek corridor for utility maintenance, open space maintenance, and emergency response would not be enhanced.

COMPARATIVE ANALYSIS OF ENVIRONMENTAL EFFECTS

The No Project Alternative would produce no changes on the project site, because the site would remain in its current condition, effectively eliminating the project impacts discussed in the Draft EIR. There would be no air emissions associated with project construction and there would be no increases in short-term construction-related noise or vibration. There would be no potential for construction-related disturbance of special-status plant or animal species or their habitat or disturbance or loss of oak woodlands, and disturbance or loss of wetlands or other waters of the U.S. would not occur. There would be no potential to unearth any unknown subsurface cultural or historic resources. However, proposed retaining walls in areas susceptible to slumping would not be constructed. Areas currently subject to localized creep, slumping, and small landslides on over-steepened slopes, along incised drainages, and during periods of water saturation would continue to be subject to localized ground failure and no bank stabilization elements would be constructed. Future soil and streambank erosion could continue to occur, creating adverse environmental effects. Impacts related to geology and soils and hydrology and water quality would be greater that the proposed project or the Option 1A, Option 1C or Option 5A alternatives.

FEASIBILITY/RELATIONSHIP TO PROJECT OBJECTIVES

The No Project Alternative would not meet the project's basic objectives. Access to the Dry Creek, Cirby Creek, and Linda Creek open space areas would not be enhanced for public recreational and educational opportunities, utility maintenance, open space maintenance, and emergency response. Effects to the natural habitat and special-status wildlife species of the Dry Creek, Cirby Creek, and Linda Creek open space areas would not occur; therefore, they would continue to be protected in the same manner as under existing conditions. The No Project Alternative would not meet the objective to develop a continuous trail alignment that maximizes opportunities for bicycle and pedestrian travel separate from roadway vehicle traffic by connecting neighborhoods, shopping and employment, schools, parks, transit, and other existing and planned trails, bikeways and walkways. In addition, the proposed retaining walls in areas susceptible to slumping would not be constructed. Areas currently subject to localized creep, slumping, and small landslides on over-steepened slopes, along incised drainages, and during periods of water saturation would continue to be subject to localized ground failure.

The City Council finds these project objectives related to providing access to open areas and developing a continuous trail alignment compelling. Because the No Project Alternative would not meet the project's basic objectives, the City Council rejects the No Project Alternative set forth and evaluated in the EIR because this alternative fails to meet objectives for the project. Therefore, the City finds that there is substantial evidence, including evidence of economic, legal, social, technological, and other considerations described under CEQA Guidelines Section 15091(a)(3), that make this alternative infeasible. In making this determination, the City Council is aware that CEQA defines "feasibility" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors."

11.3.2 Option 1A Alternative Alignment

DESCRIPTION

Option 1A Alternative Alignment would begin at the existing terminus of the Saugstad/Royer trail, travel across Darling Way bridge (potentially requiring widening of the bridge) and loop under the bridge on the west side of Dry Creek. The alternative would continue south for approximately 900 feet, crossing Dry Creek via Bridge #3 to the southern bank of Cirby Creek, from where it would traverse the existing steep slope down to the existing bench located above the 2-year water surface elevation, and continue within the floodplain along the south side of Cirby Creek toward the I-80 undercrossing. This alternative would require a retaining wall on the south side of Cirby Creek, east of the confluence with Dry Creek. Prior to Bridge #3 (on the north side of Dry Creek), access would be provided to the proposed trail-head parking area at Riverside Avenue and to the future trail extension to Vernon Street. Option 1A Alternative Alignment would require Bridge #3, but it would eliminate the need for Bridge #2 and Bridge #4.

COMPARATIVE ANALYSIS OF ENVIRONMENTAL EFFECTS

Under the Option 1A Alternative Alignment the magnitude of several impacts would be less than the project due to the construction of one fewer bridge than under the project. This would result in fewer emissions associated with construction activities, a 0.72 acre reduction in construction in the area mapped as slight erosion hazard, and would reduce the area of construction for ground-disturbing activities that could damage or destroy as yet undiscovered archaeological resources or human remains. Because there would be one fewer bridge with associated lighting, and the bridge would be further from residences, which have more potential to be light sensitive than commercial land uses, there would be less potential for the Option 1A Alternative Alignment to have adverse effects related to light and glare. However, the Option 1A Alternative Alignment would require an additional 765 linear feet of retaining walls or streambank stabilization when compared to the project, which would result in greater hydrology and water quality impacts.

FEASIBILITY/RELATIONSHIP TO PROJECT OBJECTIVES

The Option 1A Alternative Alignment would be similar to the project and would meet most of the project objectives in a similar manner as the project. This alternative would meet the objective to develop a continuous trail alignment that maximizes opportunities for bicycle and pedestrian travel separate from roadway vehicle traffic by connecting neighborhoods, shopping and employment, schools, parks, transit, and other existing and planned trails, bikeways and walkways. Access to the Dry Creek, Cirby Creek, and Linda Creek open space areas would be enhanced for public recreational and educational opportunities, utility maintenance, open space maintenance, and emergency response. Effects to the natural habitat and special-status wildlife species of the Dry Creek, Cirby Creek, and Linda Creek open space areas would be similar to the project. On balance, the Option 1A Alternative Alignment would have slightly less impact on biological resources than the Proposed Trail Alignment. This alternative

would slightly reduce trail connectivity by not providing a connection to Hernandez Lane. Also, this alternative would reduce maintenance and public safety access to the open space behind Hernandez Lane. This alternative would not meet the project objective related to seeking the most effective and efficient balance of capital cost, operational and maintenance costs, environmental and community impacts, and public benefits because preliminary cost estimates determined that construction costs for Option 1A would be greater than the selected project and Option 1C. In addition, construction of Option 1A would be more challenging than the selected project because of the steep terrain. As indicated in the City staff report for the December 18, 2018 Transportation Commission meeting, the Option 1A Alternative Alignment reduces access options for the Hillcrest neighborhood since access to Hernandez/Machado is not provided.

Therefore, the City Council rejects the Option 1A Alternative Alignment set forth and evaluated in the EIR because the City finds that there is substantial evidence, including evidence of economic, legal, social, technological, and other considerations described under CEQA Guidelines Section 15091(a)(3), that make this alternative infeasible. In making this determination, the City Council is aware that CEQA defines “feasibility” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors.”

11.3.3 Option 1C Alternative Alignment

DESCRIPTION

The Option 1C Alternative Alignment would begin just before the existing terminus of the Saugstad/Royer trail, travel under the bridge on the east side of Dry Creek and continue south for approximately 700 feet. A spur to the west would provide access to the proposed trail head parking and future trail extension toward Vernon Street, via Bridge # 2 over Dry Creek. This alternative would continue along the east side of Dry Creek and Cirby Creek for approximately 400 feet before crossing Cirby Creek via Bridge #4 to the southern bank of Cirby Creek, from where it would continue within the floodplain along the south side of Cirby Creek toward the I-80 undercrossing. The Option 1C Alternative Alignment would not require the widening of the Darling Way bridge. However, three retaining walls on the east side of Dry Creek would be required. Similar to the selected project, this alternative would include the construction of two bridges (#2 and #4).

COMPARATIVE ANALYSIS OF ENVIRONMENTAL EFFECTS

Impacts under the Option 1C Alternative Alignment would be similar to the project. The Option 1C Alternative Alignment would not require the widening of the Darling Way bridge, which would result in fewer emissions associated with bridge construction activities. Impacts associated with biological resources, cultural resources, and hazardous materials would be slightly less. Although the magnitude, frequency, and duration of construction activities would be similar to those under the selected project, the activities may occur closer to residences under the Option 1C Alternative Alignment. Additionally, implementation of this alternative would require an additional 1,080 linear feet of streambank stabilization, which would result in slightly greater impacts than those that would occur with the project.

FEASIBILITY/RELATIONSHIP TO PROJECT OBJECTIVES

The Option 1C Alternative Alignment would be similar to the project and would meet the project objectives in a similar manner as the project. This alternative would meet the objective to develop a continuous trail alignment that maximizes opportunities for bicycle and pedestrian travel separate from roadway vehicle traffic by connecting neighborhoods, shopping and employment, schools, parks,

transit, and other existing and planned trails, bikeways and walkways. Access to the Dry Creek, Cirby Creek, and Linda Creek open space areas would be enhanced for public recreational and educational opportunities, utility maintenance, open space maintenance, and emergency response. Effects to the natural habitat and special-status wildlife species of the Dry Creek, Cirby Creek, and Linda Creek open space areas would be similar to the project. On balance, the Option 1C Alternative Alignment would have slightly less impact on biological resources than the selected project. This alternative would attain the project objective related to seeking the most effective and efficient balance of capital cost, operational and maintenance costs, environmental and community impacts, and public benefits in a similar manner as the project because preliminary cost estimates were similar for Option 1C and Option 1B (the project), with current estimates indicating construction costs would be slightly less under Option 1C. However, as indicated in the City staff report for the December 18, 2018 Transportation Commission meeting, the combination of limited space, proximity of property line fences, steep banks along the creek, and the location of sewer main and manholes present significant challenges to the construction of the Option 1C Alternative Alignment. Option 1C requires challenging construction including the installation of large retaining walls along the south side of Dry and Cirby Creeks (walls 35, 36 and 37 as shown on Exhibit 3-13 of the Draft EIR).

Therefore, the City Council rejects the Option 1C Alternative Alignment set forth and evaluated in the EIR because the City finds that there is substantial evidence, including evidence of economic, legal, social, technological, and other considerations described under CEQA Guidelines Section 15091(a)(3), that make this alternative infeasible. In making this determination, the City Council is aware that CEQA defines “feasibility” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors.”

11.3.4 Option 5A Alternative Alignment

DESCRIPTION

As described in the Draft EIR, the Option 5A Alternative Alignment would begin just south of the confluence of Cirby Creek and Linda Creek and remain on the south side, following the southern bank of Linda Creek within City-owned property. The trail would travel eastward and pass beneath Sunrise Avenue. Connecting ramps would provide access to both sides of Sunrise Avenue. This alternative would continue to just east of the existing drainage outfall structure at which point it would cross to the north side of Linda Creek via Bridge #14, before continuing further east toward Oak Ridge Drive. The Option 5A Alternative Alignment would eliminate the need for Bridge #13.

COMPARATIVE ANALYSIS OF ENVIRONMENTAL EFFECTS

Under the Option 5A Alternative Alignment the magnitude of several impacts would be greater than the project because, although Bridge #13 would not be constructed, this alternative would include the construction of Bridge #14 and an additional 635 linear feet of retaining wall. This would result in a greater potential for adverse effects related to light and glare, slightly more impact on biological resources, and a significant and unavoidable construction-related vibration impact (Impact 4.10-3 in the Draft EIR) that would be similar to the construction-related noise impact (Impact 4.10-1 in the Draft EIR). However, under Alternative 5A, Impact 4.8-3 (Alter or redirect 100-year flood flows, or expose people or structures to risk of injury or damage by flood waters) would be less than significant because this alternative would not include the construction of Bridge #13. Option 5A Alternative Alignment would also result in a less severe impact related to land use because it would require less acquisition of estimated right-of-way than the EIR proposed trail alignment (see Impact 4.9-2, beginning on page 4.9-12 of the Draft EIR).

FEASIBILITY/RELATIONSHIP TO PROJECT OBJECTIVES

The EIR stated that the Option 5A Alternative Alignment would be similar to the EIR proposed project and would meet the basic project objectives in a similar manner. This alternative would meet the objective to develop a continuous trail alignment that maximizes opportunities for bicycle and pedestrian travel separate from roadway vehicle traffic by connecting neighborhoods, shopping and employment, schools, parks, transit, and other existing and planned trails, bikeways and walkways. This alternative would enhance trail connectivity when compared to the EIR proposed project by providing access to the west side of Sunrise Avenue and to Meadow Gate Drive neighborhood. Access to the Dry Creek, Cirby Creek, and Linda Creek open space areas would be enhanced for public recreational and educational opportunities, utility maintenance, open space maintenance, and emergency response. Effects to the natural habitat and special-status wildlife species of the Dry Creek, Cirby Creek, and Linda Creek open space areas would be similar to the project. On balance, the Option 5A Alternative Alignment would have slightly more impact on biological resources than the EIR Proposed Trail Alignment. In addition, preliminary cost estimates for Option 5A were higher than Option 5B (the EIR Proposed Trail Alignment). However, as indicated in the City staff report for the December 18, 2018 Transportation Commission meeting, Option 5A provides direct and convenient access to the west and east sides of Sunrise Avenue and requires less right-of-way acquisition. Option 5B (the EIR Proposed Trail Alignment) does not provide access to the east side of Sunrise Avenue, and access to the west side of Sunrise Avenue is not convenient as it begins over 500 feet from Sunrise Avenue. The limited access to Sunrise Avenue is a concern because there are no safe and convenient options for bicyclists and pedestrians to cross Sunrise Avenue. Finally, Bridge 13 of Option 5B is proposed as a low-flow bridge across Linda Creek (similar to the bridges on Miners Ravine) because the regulatory floodway is very wide at the confluence of Cirby and Linda Creeks. This may result in permitting challenges with the Central Valley Flood Protection Board since a variance would be required.

Therefore, the City Council selects the Option 5A Alternative Alignment as set forth and evaluated in the EIR for the reasons discussed above. The Option 5A Alternative Alignment was fully analyzed in the Draft EIR, and the potential impacts and required mitigation measures are included in the EIR.

11.3.5 Alternatives Conclusion

The following key considerations inform the staff recommendation for the Segment 5 Sunrise Area:

- Option 5A provides direct and convenient access to the west and east sides of Sunrise Avenue.
- Option 5A requires less right-of-way acquisition.
- Option 5B does not provide access to the east side of Sunrise Avenue, and access to the west side of Sunrise Avenue is not convenient as it begins over 500’ from Sunrise Avenue. The limited access to Sunrise Avenue is a concern because there are no safe and convenient options for bicyclists and pedestrians to cross Sunrise Avenue.
- Both Option 5A and 5B would place the trail in relatively close proximity to existing office buildings. As noted in the EIR, this will require careful construction practices at either site to minimize the potential for vibratory noise impacts.
- Bridge #14 of Option 5A has a higher cost than Bridge #13.
- Bridge 13 of Option 5B is proposed as a low-flow bridge across Linda Creek (similar to the bridges on Miners Ravine) because the regulatory floodway is very wide at the confluence of Cirby and Linda Creeks. This may result in permitting challenges with the Central Valley Flood Protection Board since a variance would be required.
- Both options 5A and 5B result in significant and unavoidable construction noise impacts. Due to the proximity of Bridge 14 to homes on Meadow Gate Drive, the vibratory noise impacts of Option 5A are greater than those of Option 5B.

As explained above, the City Council selects the Option 5A Alternative Alignment as set forth and evaluated in the EIR. The Option 5A Alternative Alignment was fully analyzed in the Draft EIR. The following Statement of Overriding Considerations applies to the selected project, which includes alignment options 1B and 5A.

12 STATEMENT OF OVERRIDING CONSIDERATIONS

In determining whether to approve a project, CEQA requires all public agencies to balance the benefits of a project against its unavoidable environmental impacts. The City Council approves the selected project despite the significant unavoidable adverse impacts identified in the EIR. The EIR consists of two text volumes and associated appendices: The Draft EIR and the Draft EIR technical appendices, and the Final EIR text. The EIR determined that the selected project is expected to result in two significant and unavoidable impacts as noted in Table 2 and discussed below.

12.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROJECT

The EIR identifies the following significant and unavoidable impacts for the selected project:

Impact 4.10-1: Short-term construction-related noise.

Impact 4.10-3: Exposure to construction-related ground-borne vibrations.

12.2 BENEFITS OF THE PROJECT

Pursuant to PRC Section 21081 and Section 15093 of the State CEQA Guidelines, the City Council of the City of Roseville adopts and makes the following statement of overriding considerations regarding the remaining significant unavoidable impacts of the selected project, as discussed above, and the anticipated economic, social, and other benefits of the project.

The City Council finds and determines that (1) the majority of the significant impacts of the selected project will be reduced to acceptable levels by implementation of the mitigation measures recommended in these findings (see Table 2); (2) the City Council's approval of the selected project will result in two significant adverse environmental effects that cannot be avoided or reduced to a less-than-significant level even with the incorporation of all feasible mitigation measures into the project; and (3) there are no other feasible mitigation measures or feasible project alternatives that will further mitigate, avoid, or reduce to a less-than-significant level the remaining significant environmental impact.

In light of the environmental, social, economic, and other considerations identified in the findings above, and the considerations set forth below related to this project, this City Council chooses to approve the selected project because, in its view, the economic, social, technological, and other benefits resulting from the selected project substantially outweigh the project's significant and unavoidable adverse environmental effects.

The following statements identify the reasons why, in the City Council's judgment, the benefits of the selected project outweigh the significant and unavoidable impacts. The substantial evidence supporting the enumerated benefits of the project can be found in the preceding findings, which are herein incorporated by reference; in the project itself; and in the record of proceedings as defined above. The overriding consideration set forth below constitutes a separate and independent ground for finding that

the benefits of the selected project outweigh its significant adverse environmental effect and is an overriding consideration warranting approval.

12.2.1 Implementation of the 2008 Bicycle Master Plan

The City's 2008 Bicycle Master Plan (BMP) includes a plan for development of over 28 miles of Class I trails in Roseville, including the Dry Creek Greenway East Trail. The project is identified as a priority project in the BMP because of its potential to provide a safe, comfortable, and convenient bicycle route in an area of the City with limited existing options for bicyclists.

The trail would be located in close proximity to several parks, including Maidu Regional Park, Saugstad Park, Eastwood Park, and Willard Dietrich Park. An existing multiuse path along the east side of Rocky Ridge Drive as well as on-street bike lanes on Rocky Ridge Drive currently provide connections from the proposed trail to Maidu Regional Park. Much of the corridor passes through pastoral settings of oak woodland, grassland, and riparian settings, offering opportunities for a variety of recreational pursuits.

The project is identified in the City of Roseville General Plan and the BMP as an alternative for pedestrians and bicyclists to using busy City streets, as well as an important recreational amenity for residents. Because there are currently limited options in the project vicinity for safe, comfortable, and convenient bicycle travel, the City identified the need for development of additional separated bike paths. The BMP identifies Class I off-street bike paths as preferred by Roseville residents because of their alignments through areas with scenic beauty and their limited motorist interaction and crossing vehicle traffic flows. As discussed in the EIR, they are most often used for recreational purposes, but they are also important for commuters where they allow bicyclists to avoid high traffic volume areas, such as highway interchanges or major arterial streets.

12.2.2 Enhanced Connectivity and Access

Enhancing connectivity is an integral part of planning a successful multi-use trail system. Connections to other multi-use trails, on-street bikeways, neighborhoods, business districts and transit increase trail access and promote trail use. The selected project has a number of opportunities for connections to the community and existing and proposed transportation facilities. Table 1 is a list of potential trail connections.

Table 1 Potential Bicycle Trail, Path, and Route System Connections

Point of Connection	Facility Type	Sheet number*	Purpose
Darling Way	Class III (e)	1	Connection to Riverside Avenue business district, Roseville Transit routes A & B, Cirby Elementary School, and Hillcrest, Cherry Glen and Los Cerritos neighborhoods
Saugstad/Royer/ Miners Ravine Trails	Class I (e)	1	Connection to Miners Ravine Trail and Downtown Roseville, including Downtown transit stations, offering transportation and looped recreation opportunities
Riverside Avenue	Class I (p) & Class II (p)	1	Future trail connection to Atkinson Street, Morgan Creek, Dry Creek Parkway Ueda Parkway and Sacramento Northern Trails (part of regional looped trail system) Roseville Transit routes A & B
Hernandez/Machado Way	Class I (e)	1	Neighborhood connection to Hillcrest area

Table 1 Potential Bicycle Trail, Path, and Route System Connections

Point of Connection	Facility Type	Sheet number*	Purpose
Cirby Hills Townhomes	Class I (p)	1	Neighborhood connection to residential community
Windscape Apartments	Class I (p)	1	Neighborhood connection to residential community
Marlin Drive	Class I/II (e)	2	Connection to Eastwood Park, Cirby Side neighborhood and Class II bike lane on Orlando Avenue, which connects to the Louis/Orlando transit station
Tina Way	Footbridge (e)	2	Connection to residential areas along Coloma Way
Sunrise Avenue	Class I (p)	3	Potential connection to Sunrise Avenue business district and Roseville Transit routes A, B, C, & F
Meadow Gate Drive	Class I/III (p)	3	Potential connection to residential neighborhood
Oakridge	Class III (e)	4	Connection to Meadow Oaks, Sierra Gardens and Cirby Ranch areas
Woodlake Lane	Class I (e)	4	Connections to Eich Middle School and Meadow Oaks area
Eich/Sierra Gardens Drive	Class I (e)	5	Connection to middle school and Sierra Gardens neighborhood
Meadowlark Lane	Class I (e)	5	Connection to Maidu Park and Sierra Gardens neighborhood
Rocky Ridge Drive	Class I/II	6	On-street and off-street connection to Maidu Park, including park-n-ride lot, Roseville Transit Routes C & F, and Maidu/South Cirby neighborhoods
Champion Oaks/N. Cirby	Class III (e)	7	On-street connection to Maidu Park and Maidu/South Cirby areas
W. Colonial Parkway	Class III (p)	7 & 8	On-street connection to Maidu/South Cirby areas
Old Auburn Way	Class I/II (p)	8	Class III connection to Citrus Heights & future Class I regional connection to American River Parkway at Beals Point (part of regional looped trail system)

Note: * See Exhibit 3-4 of the Draft EIR for an overview of the map sheet locations.

(p) = proposed; (e) = existing

Class I = Off-Street Bike Paths, located in a separate right of way, for the exclusive use of bicycles and pedestrians, with minimal cross flow by motor vehicles.

Class II = On-Street Bike Lanes, areas within paved streets that are identified by striping and signs for preferential (semi-exclusive) bicycle use.

Class III = On-Street Bike Route, on-street routes where bikes share the road with cars.

Source: City of Roseville's 2008 Bicycle Master Plan - compiled by Psomas Engineering 2013.

As discussed in the Draft EIR (page 3-6), the selected project would also serve as a paved, all-weather access for City maintenance crews. This would provide access to the City's sewer, water, and drainage outfalls that follow the creeks. In addition, the trail and its access points would provide creek maintenance crews with access to remove blockages within the stream channel and maintain conveyance of stormwater. The trail would also provide access for emergency service responders.

12.2.3 Provide Bank Stabilization Elements

During the planning and feasibility study phase, the City identified a need for a fluvial audit to assess the potential risk to the trail because of the future trajectory of the creek and existing bank erosion. The analysis employed a processed-based geomorphic assessment which coupled desk-based analysis of historical aerials, LiDAR data, and specific stream power with a field-based fluvial audit. The fluvial audit characterized various indicators of geomorphic process (e.g., channel reach type, bank erosion, depositional sedimentary bars) as well as factors influencing channel and floodplain morphology (e.g.,

bank protection, sediment input, large woody debris, etc). The analysis concluded there are some areas where there could be future risks of erosion to the trail. As a result, some bank stabilization elements were added in certain areas of the project. The Project Description (Chapter 3 of the Draft EIR) includes a description of these elements.

Without the selected project, the proposed retaining walls in areas susceptible to slumping would not be constructed. Areas currently subject to localized creep, slumping, and small landslides on over-steepened slopes, along incised drainages, and during periods of water saturation would continue to be subject to localized ground failure. Future soil and streambank erosion could continue to occur, creating adverse environmental effects.

12.2.4 Conclusion

Having reduced many of the effects of the project by adopting all feasible mitigation measures and balancing the benefits of the project against the selected project's significant and unavoidable adverse environmental impacts, the City Council hereby determines that the specific overriding social, environmental, and economic benefits of the project set forth above outweigh the potential unavoidable adverse effects of the project on the environment. The City Council finds that the overriding considerations set forth above constitutes a separate and independent basis for finding that the benefits of the project outweigh the unavoidable adverse environmental effect, and warrants approval of the selected project.

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
4.1 Aesthetics			
Impact 4.1-1: Substantially degrade the visual character or quality of the site and its surroundings.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.1-2: Create a new source of substantial light or glare that would adversely affect day or nighttime views of the area.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
4.2 Air Quality			
Impact 4.2-1: Short-term construction-generated emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$.	**Mitigation Measure 4.2-1: Reduce construction-related NO_X emissions.** Before approval of grading permits, the construction contractor shall submit for PCAPCD approval, a written calculation demonstrating that the fleet of heavy-duty (> 50 horsepower) off-road equipment used during the project's construction, including owned, leased, and subcontractor vehicles, will achieve the necessary percent reduction in NOX emissions during all construction phases, and for any periods during which multiple phases would overlap, as to not exceed 82 lb/day. Acceptable options for reducing emissions may include reduction in the number of segments constructed in a single day, use of late model-year engines, low-emission renewable diesel fuel, engine retrofit technologies, and/or other effective options as recommended by PCAPCD at the time (see Appendix C of the PCAPCD 2017 CEQA Handbook [PCAPCD 2017:75] for additional options). The calculation shall be provided using PCAPCD's Construction Mitigation Calculator.	LTS	**Finding:** Compliance with Mitigation Measure 4.2-1, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level by achieving NO_x reductions sufficient to ensure construction-generated levels of NO_x would be less than Placer County Air Pollution Control District's threshold. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Project implementation would result in construction emissions that could exceed applicable thresholds for NO_x and thus, contribute to the existing nonattainment status of

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
			the Sacramento Valley Air Basin with respect to the California Ambient Air Quality Standards (AAQS) and National AAQS. Significant impacts associated with construction emissions would be reduced to a less-than-significant level by requiring that the off-road construction equipment used or other options as recommended by PCAPCD can be demonstrated to not exceed the District's 82 lb/day threshold (Draft EIR, pp. 4.2-14 through 4.2-17).
Impact 4.2-2: Long-term use-related emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.2-3: Generation of local mobile-source CO emissions.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.2-4: Exposure of sensitive receptors to toxic air contaminant (TAC) emissions.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
4.3 Biological Resources			
Impact 4.3-1: Disturbance and loss of waters of the United States, waters of the state and riparian habitat.	**Mitigation Measure 4.3-1: Wetlands, Waters of the United States, and Water of the State.** This mitigation would apply for the Proposed Trail Alignment, Alignments Options 1A, 1C, and 5A.	LTS	**Finding:** Compliance with Mitigation Measure 4.3-1, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level by compensating for the loss of wetlands,

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	The City shall implement the following measures to compensate for the loss of wetlands, waters of the United States, waters of the State, and riparian habitat: a. The City shall submit a wetland delineation report to USACE and request a preliminary jurisdictional determination. Based on the jurisdictional determination, the City shall determine the exact acreage of waters of the United States and waters of the state that would be filled as a result of project implementation. b. The City shall replace on a "no net loss" basis (minimum 1:1 ratio) (in accordance with USACE, CDFW, and/or RWQCB) the acreage and function of all wetlands and other waters that would be removed, lost, or degraded as a result of project implementation. Wetland habitat shall be replaced at an acreage and location agreeable to USACE, CDFW, and the Central Valley RWQCB and as determined during the Section 401, Section 404 and Section 1602 permitting processes. The ratio of stream habitat restoration/replacement shall consider value for Central Valley steelhead and Chinook salmon (as discussed under Mitigation Measure 4.3-2). Habitat shall either be restored on the affected stream and within City property, or at an approved mitigation bank. In either instance, compensatory mitigation will be approved by USACE, CDFW, and RWQCB. c. The City shall obtain a USACE Section 404 Individual Permit, RWQCB Section 401 certification, and a Section 1602 streambed alteration agreement from CDFW before any groundbreaking activity within 50 feet of any wetland or water of the United States. The City shall implement all permit conditions, which may include contributions to an approved wetland mitigation bank or through the development and implementation of a Compensatory Wetland, Stream and Riparian Mitigation and Monitoring Plan for creating or restoring in-kind habitat in the surrounding area. If mitigation credits are not available, stream and riparian habitat compensation shall include establishment of riparian vegetation on currently unvegetated bank portions of streams affected by the project and enhancement of existing riparian habitat through removal of nonnative species, where appropriate, and planting additional native riparian plants to increase cover, continuity, and width of the existing riparian corridor along streams in the project site and surrounding areas. The ratio of riparian restoration/replacement shall		waters of the United States, waters of the State, and riparian habitat. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Project implementation would result in overall permanent loss of wetlands and other waters of the United States and waters of the state and associated riparian habitat. Significant impacts associated with the disturbance or loss of these waters would be reduced to a less-than-significant level by requiring that wetlands and waters be avoided to the extent feasible and that wetlands and waters that cannot be avoided are restored following construction, or if the habitat cannot be restored, that the City compensates for unavoidable losses in a manner that results in no net loss of wetlands and waters. (Draft EIR, pp. 4.3-43 through 4.3-48)

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	consider value for Central Valley steelhead and Chinook salmon (as discussed under Mitigation Measure 4.3-2) as well as City Protected trees and Oak Woodland Habitat (as discussed under Mitigation Measure 4.3-8). Construction activities and compensatory mitigation shall be conducted in accordance with the terms of a streambed alteration agreement as required under Section 1602 of the Fish and Game Code. d. The Compensatory Wetland, Stream and Riparian Restoration and Mitigation and Monitoring Plan shall include the following: 1. identification of compensatory mitigation sites and criteria for selecting these mitigation sites; 2. in kind reference habitats for comparison with compensatory wetland, stream, and riparian habitats (using performance and success criteria) to document success; 3. monitoring protocol, including schedule and annual report requirements (Compensatory habitat shall be monitored for a minimum of three (3) years from completion of mitigation, or human intervention (including recontouring and grading), or until the success criteria identified in the approved mitigation plan have been met, whichever is longer.); 4. ecological performance standards, based on the best available science and including specifications for native riparian plant densities, species composition, amount of dead woody vegetation gaps and bare ground, and survivorship (based on characteristics of the existing impacted habitat); at a minimum, compensatory mitigation planting sites must achieve 80 percent survival of planted riparian trees and shrubs by the end of the three-year maintenance and monitoring period or dead and dying trees shall be replaced and monitoring continued until 80 percent survivorship is achieved; 5. corrective measures if performance standards are not met; 6. responsible parties for monitoring and preparing reports; and 7. responsible parties for receiving and reviewing reports and for verifying success or prescribing implementation or corrective actions.		

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
Impact 4.3-2: Interfere substantially with the movement of Central Valley steelhead and Central Valley fall-run Chinook salmon.	**Mitigation Measure 4.3-2: Central Valley Steelhead and Central Valley fall-run Chinook Salmon** This mitigation would apply for the Proposed Trail Alignment, Alignment Options 1A, 1C, and 5A. The City shall implement the following measures, developed based on past consultations with NMFS, to avoid, minimize and/or mitigate potential effects on Central Valley steelhead and Central Valley fall-run Chinook salmon. a. Prior to the onset of work, the qualified biologist shall conduct a mandatory worker environmental awareness training. The training shall educate workers about the importance of avoiding impacts to Central Valley steelhead and Central Valley fall-run Chinook salmon and their habitat. The training shall also cover the relevant permit conditions and avoidance and minimization measures that protect sensitive species and habitats, as well as the penalties for non-compliance with state and federal laws, regulations, and permit requirements. The training shall include information about the life history and habitat requirements of Central Valley steelhead and Central Valley fall-run Chinook salmon and their potential to occur in the project site, as well as the terms and conditions of the Project's Biological Opinions or other authorizing documents (i.e. letter of concurrence). b. Construction activities occurring within creek banks and channel beds shall be limited to the low-flow period (typically June 15 - October 15), unless earlier or later dates are approved by CDFW and NMFS during consultation. By limiting in-water construction activities to this time period, the Project shall limit construction activities to periods when low flow depths and velocities within the project streams are less likely to support Central Valley steelhead or Central Valley fall-run Chinook salmon life stages including adult migration, spawning, and egg incubation periods. c. Fish screens or temporary stream diversion structures shall be installed to exclude Central Valley steelhead and Central Valley fall-run Chinook salmon from areas where in-water and near-water construction activities would be conducted. Installation of fish screens or temporary diversion structures shall prevent access to affected areas in the unlikely event that Central Valley steelhead or Central Valley fall-run	LTS	**Finding:** Compliance with Mitigation Measure 4.3-2, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level by implementing measures to avoid, minimize and/or mitigate potential effects on Central Valley steelhead and Central Valley fall-run Chinook salmon. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Project implementation would create construction noise, vibrations, lighting, temporary diversion structures, and temporary creek crossings, resulting in temporary sedimentation and turbidity effects, accidental spills of hazardous materials, potential noise-related disturbances, and loss of shaded riverine aquatic habitat. Significant impacts to Central Valley steelhead and Central Valley fall-run Chinook salmon would be reduced to a less-than-significant level by limiting construction to summer periods, requiring that a qualified biologist be present during the installation of fish screens, requiring the project to incorporate night lighting design that

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	Chinook salmon are present in the project streams during the low-flow period (June 15 - October 15). d. The City shall retain a qualified biologist to monitor the installation of fish screens or temporary stream diversion structures, as well as any other near or in-water construction activities (e.g., installation of RSP along creek banks or below the OHWM, installation and removal of low water crossings, placement of new abutments, rock walls, gabions, and water diversions). Prior to the installation of fish screens or temporary stream diversion structures the biologist shall visually survey the in-water work area for Central Valley steelhead and Central Valley fall-run Chinook salmon. e. Once the biologist confirms that no Central Valley steelhead or Central Valley fall-run Chinook salmon are present in the in-water work area, fish screens or temporary diversion devices shall be installed in a downstream direction, installing the upstream fish screen or temporary diversion device. The biologist shall conduct a second visual survey before the downstream portion of the fish screen or temporary stream diversion is installed. If fish are present within the diversion area, the fish shall be guided out of the in-water work area with nets by the qualified biologist. The need for fish salvage is not anticipated because Central Valley steelhead or Central Valley fall-run Chinook salmon are not likely to be present in the project streams during the low-flow period (June 15 - October 15) – primarily because of excessive summer water temperatures that occur during this period in the Project area. However, fish salvage (or relocation outside of the in-water work areas) shall be conducted as needed should fish be present. f. Before the onset of construction activities, high visibility orange construction fencing shall be installed along the perimeter of Environmentally Sensitive Areas under the supervision of the qualified biologist. Fencing shall be installed along the limits of construction in riparian habitat, minimizing the disturbance of or encroachment on sensitive aquatic and riparian habitats. The contractor shall maintain the project's Environmentally Sensitive Area fencing for the duration of the project and remove it when the project is complete. g. Erosion control BMPs shall be implemented during construction to minimize the potential for erosion, and the mobilization of sediments to project waterways and be consistent with the Open Space Preserve		does not directly shine light on water surfaces, and restoration and enhancement of the riparian corridor. (Draft EIR, pp. 4.3-48 through 4.3-57)

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	Overarching Management Plan (and related USFWS Biological Opinion (81420-2008-F-1958-3). The following erosion and sediment control measures shall be implemented to prevent sedimentation and turbidity, as well as any identified in the SWPPP, 401, 404, or 1602 permits. 1. Soil exposure shall be minimized by limiting the area of construction and disturbance and through the use of temporary BMPs, groundcover, and stabilization measures. These measures may include mulches, soil binders and erosion control blankets, silt fencing, fiber rolls, temporary berms, sediment de-silting basins, sediment traps, and check dams. 2. Pursuant to Section 13-4.03C(3) of the Caltrans Standard Specifications, water pollution control practices shall be implemented within 72 hours of stockpiling material or before a forecasted storm event, whichever occurs first. If stockpiles are being used, soil, sediment, or other debris shall not be allowed to enter storm drains, open drainages, and watercourses. Active and inactive soil stockpiles must be covered with soil stabilization. 3. Plastic mono-filament netting (erosion control matting) or similar material that could trap wildlife shall not be used. Acceptable substitutes include, but are not limited to, jute, coconut coir matting, or tackified hydroseeding compounds. 4. Energy dissipaters and erosion control pads shall be provided at the bottom of slope drains as needed. Other flow conveyance control mechanisms may include earth dikes, swales, or ditches. Stream bank stabilization measures shall also be implemented. 5. Existing vegetation shall be protected, to the extent feasible, to reduce erosion and sedimentation. Vegetation shall be preserved by installing temporary fencing, or other protection devices, around areas to be protected. Where complete removal is not necessary, vegetation shall be cut to ground level with the root systems left intact to prevent erosion and facilitate the recovery of riparian vegetation after project activities are complete. 6. Exposed soils shall be covered by loose bulk materials or other materials to reduce erosion and runoff during rainfall events.		

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	7. Exposed soils shall be stabilized, through watering or other measures, to prevent the movement of dust at the project site caused by wind and construction activities such as traffic and grading activities. 8. All construction roadway areas shall be properly protected to prevent excess erosion, sedimentation, and water pollution. 9. The contractor shall conduct periodic maintenance of erosion and sediment control measures. All erosion and storm water control measures shall be properly maintained for the duration of the project. h. A Spill Prevention and Control Plan shall be developed and implemented by the City, or its contractor, for the duration of the project. Pollution prevention and control BMPs shall be implemented during construction to minimize the risk of hazardous materials being released into waters in the project site. The following pollution and contamination prevention measures shall be implemented to prevent the release of hazardous materials during construction: 1. All equipment and materials shall be stored at least 50 feet from wetlands or waters in the project site unless the equipment is on established paved areas. If storage of equipment or materials within 50 feet of wetlands or waters in the project site is necessary, secondary containment shall be utilized to contain the equipment and materials and prevent discharge of any harmful substances into the soil or aquatic resources. Staging and storage areas for equipment, materials, fuels, lubricants, and solvents shall be located outside of the channel and banks of Dry Creek, Cirby Creek, Linda Creek, and Strap Ravine. 2. Secondary containment shall be provided for stationary equipment such as motors, pumps, generators, and compressors located within or adjacent to the Dry Creek, Cirby Creek, Linda Creek, and Strap Ravine. Any equipment or vehicles driven or operated within or adjacent to these creeks shall be checked and maintained daily to ensure proper working conditions to avoid potential impacts such as leaks. 3. No fueling, cleaning or maintenance of vehicles or equipment, or placement of construction debris, spoils or trash should occur within		

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	50 feet of wetlands or waters in the project site unless it occurs in designated refueling/staging areas on existing paved surfaces with secondary containment in place. Refueling of equipment should occur at approved fuel locations. Contractor shall inspect all equipment/vehicles for leaks prior to use and should inspected regularly during Project inspection. 4. For work that is to occur on existing structures over open flowing portions of Dry Creek, Cirby Creek, Linda Creek, or Strap Ravine, a method of containment such as netting, tarps or similar catchments shall be utilized to catch debris or other potential construction materials and prevent such material from falling into the waters. i. Lighting design shall include measures to limit the amount of light "spill" on water surfaces at night that could lead to predation of juvenile salmonids. To minimize the effects of lighting on salmonids, the City shall prevent lighting that directly shines on the water surfaces of Dry Creek, Cirby Creek, and Linda Creek by minimizing the amount of lighting necessary to safely and effectively illuminate pedestrian areas on bridges and trails, and by shielding and focusing lights on the bridge and trail surfaces and away from water surfaces. j. The project shall avoid impacts to riparian vegetation where feasible, and shall incorporate restoration and enhancement of the riparian corridor into the final design plans and construction specifications and shall develop a riparian and restoration plan (RRP), as part of the Compensatory Wetland, Stream and Riparian Mitigation and Monitoring Plan discussed in Impact 4.3-1, Disturbance and loss of waters of the United States, and Mitigation Measure 4.3-1 that involves onsite enhancements and purchase of mitigation bank credits to compensate for permanent and temporal loss of riparian and SRA cover. The RRP shall include on-site measures such as enhancing riparian vegetation by the planting of native shrub, tree, and understory species to create a more diverse vegetation structure and thus a higher quality habitat for wildlife. The onsite measures in the RRP may also include the planting of willows and other fast-growing native riparian species, which can quickly compensate for the loss of riparian and SRA cover, and will be planted where erosion control (RSP, slope pavement etc.) is installed along stream banks. Permanent impacts to riparian vegetation can also be mitigated with the purchase of credits		

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	(1:1 for riparian and 1.7:1 for SRA cover), and 0.5:1 for temporal loss of riparian vegetation and SRA cover. Restoration and enhancement of the riparian vegetation in the project site (combined with mitigation bank credits) shall result in no net loss of riparian habitat acreage or function and shall increase the quality of habitat for Central Valley steelhead (including Critical Habitat), Central Valley fall-run Chinook salmon (including EFH), and shall be accomplished through development and implementation of the RRP. Permanent impacts to riparian, including SRA, and waters of the United States shall be further analyzed and determined based on final design for each construction phase during Section 7 consultation as part of USACE Section 404 and CDFW Section 1602 permitting. k. Construction techniques shall be implemented to isolate near shore work from waterbodies in the project site. It is anticipated that clear water diversion using a cofferdam or gravel bag berm with impermeable layer would be used. Isolating in-water construction areas behind cofferdams would minimize the potential for turbidity and suspended sediments from reaching levels that could harm Central Valley steelhead, degrade existing Critical Habitat, harm Central Valley fall-run Chinook salmon, or degrade existing EFH. The extent of cofferdam footprints and dewatering shall be kept to the minimum necessary to support construction activities, and creek flow shall not be interrupted or reduced as a result of construction activities. Any fill material used in association with the cofferdams, such as sandbag fill, shall be composed of washed, rounded, spawning-sized gravel between 0.4 and 4 inches in diameter. If authorized by applicable state and federal permits, any of this gravel in contact with flowing water shall be left in place, and distributed manually with hand tools to allow passage for all life stages of fish. Installation and removal of cofferdams and/or gravel bag berms would be restricted to the summer low-flow period.		
Impact 4.3-3: Disturbance or loss of valley elderberry longhorn beetle or its habitat.	**Mitigation Measure 4.3-3a: Avoidance and Minimization Measures** The following measures shall be implemented to avoid or minimize effects to VELB and/or its habitat during construction of the proposed project. a. A worker awareness training program for construction personnel shall be conducted by a qualified biologist prior to beginning construction	LTS	**Finding:** Compliance with Mitigation Measures 4.3-3a through 4.3-3d, which have been required or incorporated into the project, will reduce this impact to a less-than-significant level by implementing

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	activities. The program shall inform all construction personnel about the life history and status of the beetle, requirements to avoid damaging the elderberry plants, and the possible penalties for not complying with these requirements. Written documentation of the training shall be submitted to the USFWS within 30 days of its completion. b. If elderberry shrubs can be retained within the project footprint, the City shall avoid indirect impacts by implementing the following measures, to the extent feasible, or equivalent measures agreed to in consultation with USFWS. Minimization measures include: 1. Avoidance Area. An avoidance area shall be established at least 20 feet from the drip-line of an elderberry shrub for any activities that may damage or kill the elderberry shrub (e.g., trenching, paving, etc.). 2. Fencing. All areas to be avoided during construction activities shall be fenced and/or flagged as close to construction limits as feasible. 3. Signage. Signage shall be posted every 50 feet along the buffer area with the following information, "This area is habitat of the valley elderberry longhorn beetle, a threatened species, and must not be disturbed. This species is protected by the Endangered Species Act of 1973, as amended. Violators are subject to prosecution, fines, and imprisonment." The signs shall be clearly readable from a distance of 20 feet, and must be maintained for the duration of construction. 4. Timing. To the extent feasible, all activities that could occur within 165 feet of an elderberry shrub, shall be conducted outside of the VELB flight season (March - July). 5. Erosion Control and Revegetation. Erosion control measures will be implemented to restore areas disturbed within 165 feet of elderberry shrubs and the affected area will be re-vegetated with appropriate native plants. 6. Chemical Usage. Herbicides will not be used within the drip-line of the shrub. Insecticides will not be used within 100 feet of an elderberry shrub. All chemicals will be applied using a backpack sprayer or similar direct application method.		measures to avoid or minimize effects to VELB and/or its habitat during construction. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Project implementation would result in the direct removal of elderberry shrubs, ground-disturbing construction within the root zone of the shrubs, and permanent removal of riparian habitat. Significant impacts to VELB would be reduced to a less-than-significant level by requiring the protection of those elderberry shrubs that would not need to be removed, and in consultation with USFWS the transplanting of elderberry shrubs to a USFWS-approved location and the purchasing of credits. (Draft EIR, pp. 4.3-57 through 4.3-66)

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	7. Mowing. Mechanical weed removal within the drip-line of the shrub shall be limited to the season when adults are not active (August - February) and shall avoid damaging the elderberry. 8. Pre-construction and post-construction surveys. Pre-construction surveys shall document compliance with mitigation measures. The post-construction survey shall confirm that there was no additional damage to any of the elderberry shrubs than as described in this document. 9. Construction monitoring. A qualified biologist shall monitor the work area at project-appropriate intervals to assure that all avoidance and minimization measures are implemented. The amount and duration of monitoring will depend on the project specifics and shall be discussed with a USFWS biologist. 10. Elderberry Shrub Protection and Management Plan. The City will develop as part of the Section 7 consultation process with USFWS for the Dry Creek Greenway Multi-Use Trail project an elderberry shrub protection and management plan that will include how the buffer areas are to be protected, restored, and maintained after construction is completed and the City will ensure that ground-disturbing activities on the project site do not alter the hydrology for shrubs to be protected or otherwise affect the likelihood of vigor or survival of elderberry shrubs. The Elderberry Shrub Protection and Management Plan shall be consistent with the City's Open Space Preserve Overarching Management Plan. **Mitigation Measure 4.3-3b: Removing/Transplanting Individual Elderberry Shrubs** a. Elderberry shrubs that are in the path of construction activities and cannot be avoided shall be removed and if feasible, transplanted, according to Table 4.3-5. A Biological Opinion from USFWS will be obtained prior to removal or transplanting of elderberry shrubs. Removal of a shrub may either include the roots or just the removal of the above-ground portion of the plant. If feasible, the entire root ball shall be removed, and the shrub transplanted. b. Elderberry shrubs requiring removal shall be transplanted as close as feasible to its original location within City-owned property or as approved by USFWS. Elderberry shrubs may be relocated adjacent to		

Table 2 Selected Project Impacts and Findings of Fact

<table>
<tr><th>Impacts</th><th>Mitigation Measures</th><th>Significance after Mitigation</th><th>Findings of Fact</th></tr>
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the project footprint if: 1) the planting location is suitable for elderberry growth and reproduction; and 2) the City is able to provide long-term protection to the shrub and ensure that the shrub becomes reestablished.
c. If these criteria cannot be met, the shrub may be transplanted to an appropriate USFWS-approved mitigation site.
d. Any elderberry shrub that is unlikely to survive transplanting because of poor condition or location, or a shrub that would be extremely difficult to move because of access problems, may not be appropriate for transplanting. The following transplanting guidelines shall be used to guide removal and transplanting of elderberry shrubs on the project site:
1. A qualified biologist shall be on-site for the duration of transplanting activities to assure compliance with avoidance and minimization measures and other conservation measures.
2. Exit-hole surveys shall be completed immediately before transplanting. The number of exit holes found, GPS location of the plant to be relocated, and the GPS location of where the plant is transplanted shall be reported to the USFWS and to the California Natural Diversity Database (CNDDB).
3. Elderberry shrubs shall be transplanted when the shrubs are dormant (November through the first two weeks in February) and after they have lost their leaves. Transplanting during the non-growing season will reduce shock to the shrub and increase transplantation success.
4. Transplanting shall follow the most current version of the ANSI A300 (Part 6) guidelines for transplanting (http://www.tcia.org/).
Table 4.3-5 Mitigation for Loss of Individual Shrubs According to Preliminary Project Design
<table>
<tr><th>Shrub ID</th><th>Proposed Trail Alignment</th><th>Alignment Option 1A</th><th>Alignment Option 1C</th><th>Alignment Option 5A</th></tr>
<tr><td>ES24</td><td>Transplant if feasible</td><td>Transplant if feasible</td><td>Transplant if feasible</td><td>Transplant if feasible</td></tr>
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Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact

ES25	Transplant if feasible	Transplant if feasible	Transplant if feasible	Transplant if feasible
ES26	Transplant if feasible	Transplant if feasible	Transplant if feasible	Transplant if feasible
ES31	Transplant if feasible	No Impact	Transplant if feasible	Transplant if feasible
ES32	Transplant if feasible	No Impact	No Impact	Transplant if feasible
ES33	Transplant if feasible	No Impact	Transplant if feasible	Transplant if feasible
ES34	Transplant if feasible	Transplant if feasible	Transplant if feasible	Transplant if feasible
ES35	Transplant if feasible	Transplant if feasible	Transplant if feasible	Transplant if feasible
ES36	Transplant if feasible	Transplant if feasible	Transplant if feasible	Transplant if feasible
ES37	Transplant if feasible	Transplant if feasible	Transplant if feasible	Transplant if feasible
ES38	Transplant if feasible	Transplant if feasible	Transplant if feasible	Transplant if feasible
ES39	Transplant if feasible	Transplant if feasible	Transplant if feasible	Transplant if feasible
ES40	Transplant if feasible	Transplant if feasible	Transplant if feasible	Transplant if feasible
ES41	Transplant if feasible	Transplant if feasible	Transplant if feasible	Transplant if feasible
ES42	Transplant if feasible	Transplant if feasible	Transplant if feasible	Transplant if feasible

Mitigation Measure 4.3-3c: Compensatory Mitigation for Loss of Riparian Habitat

a. The following compensatory mitigation addresses impacts to VELB habitat through compensating for the permanent loss of riparian habitat within 165 feet of elderberry shrubs. Table 4.3-6 lists the total riparian habitat that is anticipated to be lost, according to the preliminary project

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact

design, and the corresponding credits that shall be purchased to replace habitat lost at a 3:1 ratio, as outlined in the VELB framework (USFWS 2017b). The exact amount of compensation shall be as agreed to by USFWS, per Section 7 consultation under the Federal Endangered Species Act.

Table 4.3-6 Potential Valley Elderberry Longhorn Beetle Habitat-Level Compensation

Project Alternative Options	Compensation Ratio	Loss of Riparian Habitat (acres)	Acres of Credit[1]	Total Credit Purchase[2]
Proposed Trail Alignment	3:1	1.22	3.66	89
Alignment Option 1A	3:1	0.89	2.67	65
Alignment Option 1C	3:1	1.41	4.23	103
Alignment Option 5A	3:1	1.22	3.66	89

[1] Acre(s) of credit = Compensation Ratio X Total Acres of Riparian Habitat Permanently Lost within 165 Feet of Elderberry Shrubs

[2] Formula for Credit Purchase: 1 credit = 0.041 acres

b. If the City chooses not to purchase credits at a USFWS-approved bank, they shall follow USFWS requirements for providing a permanent conservation area that meets USFWS criteria and approval, as described in the VELB Framework (USFWS 2017b).

Mitigation Measure 4.3-3d: Consultation with USFWS

Caltrans, as the federal designated agency, will consult with USFWS under Section 7 of ESA for approval of transplanting and compensatory measures outlined in Mitigation Measures 4.3-3b and 4.3-3c prior to project construction.

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
Impact 4.3-4: Disturbance or loss of Swainson's hawk, white-tailed kite, and other nesting raptors.	**Mitigation Measure 4.3-4: Nesting Raptors** This mitigation would apply for the Proposed Trail Alignment, Alternative Alignments 1A, 1C, and 5A. The following measures shall be implemented to avoid, minimize and fully mitigate impacts to Swainson's hawk, white-tailed kite, as well as other raptors. a. For project activities, including tree removal, that begin between February 15 and September 15, a qualified biologist shall conduct preconstruction surveys for nesting raptors and to identify active nests on and within 0.25 mile of the project site with direct line of sight from public access areas with the use of binoculars and spotting scopes to the proposed work areas. The surveys shall be conducted before the beginning of any construction activities between February 15 and September 15. b. The City shall attempt to initiate upland construction activities before the nest initiation phase (i.e., before February 15). If breeding raptors establish an active nest site, as evidenced by nest building, egg laying, incubation, or other nesting behavior, near the construction area, they shall not be harassed or deterred from continuing with their normal breeding activities. c. Impacts to nesting raptors shall be avoided by establishing appropriate buffers around active nest sites identified during preconstruction raptor surveys. No project activity shall commence within the buffer areas until a qualified biologist has determined the young have fledged, the nest is no longer active, or reducing the buffer, in coordination with CDFW, would not likely result in nest abandonment. CDFW guidelines recommend implementation of 500 feet for raptors, but the size of the buffer may be adjusted if a qualified biologist and the City, in consultation with CDFW, determine that such an adjustment would not likely adversely affect the nest. Monitoring of the nest by a qualified biologist during construction activities shall be required if the activity has potential to adversely affect the nest. d. Trees shall not be removed during the breeding season for nesting raptors unless a survey by a qualified biologist verifies that there are not active nests within the trees or within 500 feet of the trees proposed to be removed. Loss of trees that provide potential nesting habitat shall	LTS	**Finding:** Compliance with Mitigation Measure 4.3-4, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level by implementing measures to avoid, minimize and fully mitigate impacts to Swainson's hawk, white-tailed kite, as well as other raptors. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Project implementation would result in removal of trees within oak woodland and riparian habitat, leading to the potential direct removal or disturbance of active raptor nests. Significant impacts to nesting raptors would be reduced to a less-than-significant level by identifying nests, removing vegetation and trees outside of the nesting season, conducting pre-construction surveys if construction activities are to occur during the nesting season, and mitigating for the loss of oaks and riparian trees. (Draft EIR, pp. 4.3-66 through 4.3-69)

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	be compensated by planting replacement trees according to Mitigation Measure 4.3-1 (wetlands/riparian trees) and Mitigation Measure 4.3-8 (protected oak trees).		
Impact 4.3-5: Disturbances to special-status song birds.	**Mitigation Measure 4.3-5: Special-status birds** This mitigation would apply for the Proposed Trail Alignment, Alignment Option 1A, 1C, and 5A. The following measures shall be implemented and are intended to avoid, minimize, and fully mitigate impacts to nesting special-status birds. a. The City shall ensure that before any ground-disturbing project activities begin for a given proposed trail segment, a qualified biologist shall identify potential habitat for nesting special-status bird species in areas that could be affected during the breeding season by construction. b. If vegetation removal or other disturbance related to construction of the trail segment is required during the nesting season, focused surveys for active nests of special-status birds shall be conducted before and within 5 days of initiating construction by a qualified biologist. The appropriate area to be surveyed and timing of the survey may vary depending on the activity and species that could be affected. If no active nests are found during focused surveys, no further action under this measure shall be required. c. If an active special-status bird nest is located during the preconstruction surveys, the biologist shall notify the City and the City shall notify CDFW. Construction shall be prohibited within a minimum of 25 feet of the nest to avoid disturbance until the nest is no longer active. d. If construction stops for more than 5 days during the nesting season, a follow up survey shall be conducted to make sure that no birds moved into the area and started nesting.	LTS	**Finding:** Compliance with Mitigation Measure 4.3-5, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level by implementing measures to avoid, minimize and fully mitigate impacts to nesting special-status birds. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Project implementation would result in vegetation clearing and other construction activities which could result in the loss of individuals or nests, or disruptions to nesting attempts, special-status bird species if they nest in the project area in the future. Significant impacts to nesting special-status birds would be reduced to a less-than-significant level by identifying potential habitat, conducting pre-construction surveys if construction activities are to occur during the nesting season, and prohibiting construction within a minimum of 25 feet of an active nest. (Draft EIR, pp. 4.3-70 through 4.3-72)

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
Impact 4.3-6: Disturbance or loss of Western pond turtle.	**Mitigation Measure 4.3-6: Western Pond Turtle.** This mitigation would apply for the Proposed Trail Alignment, Alignment Options 1A, 1C, and 5A. a. Implement Mitigation Measure 4.3-1. b. Before ground disturbance, all onsite construction personnel shall be instructed by a qualified biologist regarding the potential presence of western pond turtle, the importance of avoiding impacts on this species and its habitat, and recognition of western pond turtle and its habitat(s). c. Within 24 hours before beginning construction activities within 200 feet of suitable aquatic habitat for western pond turtle, a qualified biologist shall inspect areas of anticipated disturbance for the presence of western pond turtle nests and individuals. If nests are found, a 100-foot no disturbance buffer shall be erected and maintained until the turtles have hatched and no obstructions between the nest and aquatic habitat shall be created. No vegetation clearing will be allowed within the buffer to shelter the turtles from the elements and potential predators. d. If adult and juvenile turtles are found during preconstruction, dewatering, or fish rescue operations, the biologist shall relocate the western pond turtle to the nearest suitable habitat outside of the area of disturbance. The construction area shall be re-inspected whenever a lapse in construction activity of two weeks or more has occurred. The biologist shall be available thereafter; if a turtle is encountered during construction activities, the biologist shall relocate the western pond turtle to the nearest suitable aquatic habitat outside the area of disturbance. As suitable habitat is located throughout the area, it is not anticipated that turtles would be relocated far from construction areas and that they would recolonize following construction. e. After completion of project-related construction activities, any temporary fill and construction debris shall be removed, and temporarily disturbed areas shall be restored to pre-project conditions. Restoration of grassland and riparian habitat shall be conducted as applicable under Mitigation Measure 4.3-1 (for riparian vegetation) and Mitigation Measure 4.3-4 (for grassland habitat) in proximity to the stream corridors.	LTS	**Finding:** Compliance with Mitigation Measure 4.3-6, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level by avoiding or relocating western pond turtles. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Project implementation would result in vegetation-clearing and other construction activities that could result in the loss of individuals or nests, or disruptions to nesting attempts, of western pond turtle. Significant impacts to western pond turtles would be reduced to a less-than-significant level by identifying and avoiding western pond turtle nest sites or temporarily relocating individuals outside of the construction area. (Draft EIR, pp. 4.3-72 through 4.3-74)

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
Impact 4.3-7: Disturbance or loss of special-status bats – pallid bat and silver-haired bat.	**Mitigation Measure 4.3-7: Special-status bats** This mitigation would apply for the Proposed Trail Alignment, Alternative Alignments 1A, 1C, and 5A. a. Bat surveys shall be conducted by a qualified wildlife biologist within 5 days before removal of trees that have suitable roosting habitat for bats. Specific survey methodologies shall be determined in coordination with CDFW, and may include visual surveys of bats (e.g., observation of bats during foraging period), inspection for suitable habitat, bat sign (e.g., guano), or use of ultrasonic detectors (e.g., Petterson, Anabat, Wildlife Acoustics). Removal of any significant roost sites located shall be avoided to the extent feasible with a non-disturbance buffer of 250-feet. If it is determined that an active roost site cannot be avoided and will be affected, bats shall be excluded from the roost site before the site is removed. The City shall first notify and consult with CDFW on appropriate bat exclusion methods and roost removal procedures. Exclusion methods may include use of one-way doors at roost entrances (bats may leave, but not reenter), or sealing roost entrances when the site can be confirmed to contain no bats. Once it is confirmed that all bats have left the roost, crews shall be allowed to continue work in the area. The City may have to provide temporary suitable bat roosting habitat (i.e. bat boxes), prior, during, and after exclusion to provide bat roosting habitat. b. Exclusion efforts shall be restricted during periods of sensitive activity (e.g., during winter hibernation or while females in maternity colonies are nursing young [generally, April 15 through August 15]). If a hibernation or maternity roosting site is discovered, the project biologist and the City shall consult with CDFW to establish appropriate exclusionary buffers until all young are determined to be able to fly by the project biologist. Once it is determined that all young are able to fly, passive exclusion devices shall be installed and all bats will be allowed to leave voluntarily. Once it is determined by a qualified biologist that all bats have left the roost, crews shall be allowed to work within the buffer zone.	LTS	**Finding:** Compliance with Mitigation Measure 4.3-7, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level by implementing measures to avoid and minimize impacts to special-status bats. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Project implementation would result in vegetation clearing and other construction activities that could result in the loss of individuals or bat roosts, or disruptions to maternity roosts, of silver-haired bat and pallid bat. Significant impacts to special-status bats would be reduced to a less-than-significant level by conducting bat surveys and restricting exclusion efforts during periods of sensitive activity. (Draft EIR, pp. 4.3-74 through 4.3-77)
Impact 4.3-8: Disturbance or loss of City protected trees, Valley Oak Woodland, and other	**Mitigation Measure 4.3-8: Avoid impacts or mitigate for impacts to Valley Oak Woodland, and other Sensitive Vegetation Alliances and Associations (previously known as Sensitive Natural Communities)**	LTS	**Finding:** Compliance with Mitigation Measure 4.3-8, which has been required or incorporated into the

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
Sensitive Vegetation Alliances and Associations.	This mitigation would apply for the Proposed Trail Alignment, Alignment Option 1A, 1C, and 5A. a. To the maximum extent feasible, oak and riparian trees shall be avoided where possible and protection measures shall be implemented to protect oak woodlands, riparian areas and associated native trees from project-related impacts. The following measures shall be implemented for oak and riparian trees that would be impacted by project activities to avoid and minimize potential impacts to individual oak and riparian trees: 1. Temporary protective fencing shall be installed at least one foot outside the dripline of the native oak tree before initiating construction to avoid damage to the tree canopy and root system. A circle with a radius measurement from the trunk of the tree to the tip of its longest limb will constitute the dripline protection area for each tree. Limbs must not be cut back to change the dripline. The area beneath the dripline is a critical portion of the root zone and defines the minimum protected area of each tree. Removing limbs that make up the dripline does not change the protected area. 2. No vehicles, construction equipment, mobile home/office, supplies, materials or facilities shall be driven, parked, stockpiled or located within the dripline of the native oak trees. 3. No grading shall be allowed within the dripline of the native oak tree. 4. No trenching shall be allowed within the dripline of the native oak tree. If it is necessary to install underground utilities within the dripline of the native oak tree, the utility line shall be jacked and bored under the supervision of a certified arborist. 5. Drainage patterns onsite shall not be modified so that water collects or stands within, or is diverted across, the dripline of any native oak tree. 6. If ground disturbance must occur within the protected zone of a native oak tree, all work shall occur consistent with the City's Tree Preservation Ordinance requirements. b. For those trees that cannot be avoided, the City shall comply with any riparian habitat conditions to comply with the Compensatory Wetland, Stream and Riparian Mitigation and Monitoring Plan that will be		project, will reduce this impact to a less-than-significant level by implementing measures to avoid, minimize and fully mitigate impacts to sensitive vegetation alliances. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Project implementation would result in vegetation clearing and other construction activities that could result in the loss of sensitive vegetation alliances, such as valley oak riparian woodlands and riparian habitat. Significant impacts to sensitive vegetation alliances would be reduced to a less-than-significant level because the City would be required to identify and avoid oaks, oak woodlands and riparian habitat or provide compensation for loss of oaks, riparian trees, oak woodland and riparian habitat through enhancement of existing habitats, creation and management of oak woodland and riparian habitat, conservation easements, or other appropriate measures. (Draft EIR, pp. 4.3-77 through 4.3-80)

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	developed during the Section 404, Section 401, and Section 1602 permitting process as described in Mitigation Measure 4.3-1. Additionally, the City shall implement the following: 1. An arborist report shall be conducted to identify the species and quantities of trees that will be removed to implement the project. 2. If native oak trees are removed, they shall be replaced as outlined in the City's Tree Preservation Ordinance 19.66.070. A Tree Planting and Maintenance Plan showing species, size, spacing and location of plantings, and the location and species of established vegetation shall be prepared. A monitoring program shall also be established to ensure compliance with any prescribed mitigation measures established by the project and to monitor the oak woodland restoration area. 3. Fully implement Mitigation Measure 4.3-1, which requires the City to secure and comply with a CDFW Streambed Alteration Agreement that would include a riparian restoration component.		
Impact 4.3-9: Disturbance or loss of special-status plants – Sanford's arrowhead.	**Mitigation Measure 4.3-9: Special-status plants – Sanford's arrowhead.** This mitigation would apply for the Proposed Trail Alignment, Alternative Alignments 1A, 1C, and 5A. The City shall implement the following measures to reduce potential impacts on Sanford's arrowhead: a. Prior to project construction and during the blooming period for Sanford's arrowhead (May – November), a qualified botanist shall conduct floristic-level surveys for Sanford's arrowhead in areas where potentially suitable habitat would be removed or disturbed by project activities. The normal blooming period for Sanford's arrowhead generally indicates the optimal survey period when the species is most identifiable. b. If no Sanford's arrowhead plants are found, the botanist shall document the findings in a letter report to the City of Roseville and CDFW and no further mitigation shall be required. c. If Sanford's arrowhead plants are found that cannot be avoided during construction, the City shall consult with CDFW to determine the appropriate mitigation measures for direct and indirect impacts that	LTS	**Finding:** Compliance with Mitigation Measure 4.3-9, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level by implementing measures to avoid, minimize and fully mitigate impacts to Sanford's arrowhead. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Project implementation would result in vegetation clearing and other in-water construction activities

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	could occur as a result of project construction and shall implement the agreed-upon mitigation measures to achieve no net loss of occupied habitat or individuals. Mitigation measures may include preserving and enhancing existing populations, creation of offsite (but within the stream reach) populations on project mitigation sites through seed collection or transplantation, and/or restoring or creating suitable habitat in sufficient quantities to achieve no net loss of occupied habitat and/or individuals. Potential mitigation sites could include suitable locations along the stream but outside of the construction areas. A mitigation and monitoring plan shall be developed describing how unavoidable losses of special-status plants will be compensated. d. If relocation efforts are part of the mitigation plan, the plan shall include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. e. Success criteria for preserved and compensatory populations shall include: 1. The extent of occupied area and plant density (number of plants per unit area) in compensatory populations shall be equal to or greater than the affected occupied habitat. 2. Compensatory and preserved populations shall be self-producing. Populations shall be considered self-producing when: I. plants reestablish annually for a minimum of five years with no human intervention such as supplemental seeding; II. reestablished and preserved habitats contain an occupied area and flower density comparable to existing occupied habitat areas in similar habitat types in the project vicinity. 3. If off-site mitigation includes dedication of conservation easements, purchase of mitigation credits, or other off-site conservation measures, the details of these measures shall be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, success criteria such as those listed		that could result in the loss of Sanford's arrowhead. Significant impacts to Sanford's arrowhead would be reduced to a less-than-significant level by requiring the City to identify and avoid Sanford's arrowhead plants or provide compensation for loss of Sanford's arrowhead plants through enhancement of existing populations, creation and management of offsite populations, conservation easements, or other appropriate measures. (Draft EIR, pp. 4.3-80 through 4.3-83)

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	above and other details, as appropriate to target the preservation of long term viable populations.		
Impact 4.3-10: Impacts on movement of native resident or migratory fish or wildlife species or migratory wildlife corridors or impede the use of native wildlife nursery sites.	**Mitigation Measure 4.3-10: Movement of native resident or migratory fish or wildlife species or migratory wildlife corridors or impede the use of native wildlife nursery sites.** This mitigation would apply for the Proposed Trail Alignment, Alternative Alignments 1A, 1C, and 5A. Implementation of Mitigation Measure 4.3-1 and Mitigation Measure 4.3-2 would ensure that impacted habitats are mitigated for or restored, and work windows would prevent impact to migratory fish species. The work windows would allow the fish to freely use the stream corridors during migration to and from the streams. Impacted habitats (i.e., aquatic, riparian and SRA) would be restored or mitigated for and although affected their long-term function as breeding or nursery site would not be impacted. a. Implement Mitigation Measure 4.3-1 Wetlands, Waters of the United States, waters of the state and riparian habitat. b. Implement Mitigation Measure 4.3-2 Central Valley Steelhead and Central Valley Fall-run Chinook Salmon.	LTS	**Finding:** Compliance with Mitigation Measure 4.3-10, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level by ensuring that impacted habitats are mitigated for or restored, and work windows would prevent impact to migratory fish species. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Project implementation would result in disturbances that have the potential to harass and disrupt migratory behavior and spawning sites of Central Valley steelhead and/or Central Valley fall-run Chinook salmon. Significant impacts to migratory fish, their breeding and nursery habitat to less-than-significant level because the City would have to secure permits from Federal and State Agencies (i.e. Sections 401, 404, and 1602 permits) that would restrict work windows to those when these species are not expected to be within the stream corridor, would require the City to mitigate for the loss of aquatic and

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
			riparian, and although the aquatic and riparian habitat would be temporarily affected, it would not result in substantial effects migratory fish movement or to their breeding or nursery sites. (Draft EIR, pp. 4.3-83 through 4.3-85)
4.4 Cultural Resources			
Impact 4.4-1: Disturb archaeological resources, including tribal cultural resources.	**Mitigation Measure 4.4-1: Proper Handling of Archaeological Resources.** This mitigation would apply for the Proposed Trail Alignment, Alignment Options 1A, 1C, and 5A. A minimum of seven days prior to beginning earthwork or other soil disturbance activities, the City shall notify UAIC of the proposed earthwork start-date. As part of this notification, a UAIC tribal representative shall be invited to inspect the project site, including any soil piles, trenches, or other disturbed areas, within the first five days of groundbreaking activity. During this inspection, a site meeting of construction personnel shall also be held to afford the tribal representative the opportunity to provide cultural resources awareness information. If any cultural resources, such as structural features, unusual amounts of bone or shell, artifacts, human remains, or architectural remains are encountered during this initial inspection or during any subsequent construction activities, work shall be suspended within 100 feet of the find, and the City's Project Manager shall immediately notify the City of Roseville Development Services Director. The City's Project Manager, in consultation with the City's Environmental Coordinator, shall coordinate any necessary investigation of the site with a qualified archaeologist approved by the City, and as part of the site investigation and resource assessment the archeologist shall consult with the UAIC and provide proper management recommendations should potential impacts to the resources be found by the City to be significant. A written report detailing the site assessment, coordination activities, and management recommendations shall be provided to the City by the qualified archaeologist. Possible management recommendations for unique archaeological resources could include resource avoidance or, where avoidance is infeasible in light of project design or layout or is	LTS	**Finding:** Compliance with Mitigation Measure 4.4-1, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level by allowing a UAIC tribal representative to inspect the site during the first week of ground disturbance activities. If any resources are unearthed during construction all work will be suspended within 100 feet of the find and appropriate agencies contacted. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Construction of the proposed project could result in the discovery of unknown subsurface resources. Significant impacts associated with the potential disturbance of unknown archeological resources would be reduced to a less-than-significant level by ensuring a UAIC tribal monitor is

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	unnecessary to avoid significant effects, preservation in place or other measures. The contractor shall implement any measures deemed by City staff to be necessary and feasible to avoid or minimize significant effects to the cultural resources.		present and the proper agencies are contacted in the event something is discovered. (Draft EIR, pp. 4.4-11 through 4.4-14)
Impact 4.4-2: Accidental discovery of human remains.	**Mitigation Measure 4.4-2: Stop work if human remains are discovered.** This mitigation would apply for the Proposed Trail Alignment, Alignment Options 1A, 1C, and 5A. If human remains are discovered during any construction activities, potentially damaging ground-disturbing activities in the area of the remains shall be halted immediately, and the project applicant shall notify the Placer County coroner and the NAHC immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the NAHC to be Native American, the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The City shall also retain a professional archaeologist with Native American burial experience to assist the City of Roseville, the landowner, and the MLD with any management steps prescribed in California Health and Safety Code Section 7050.5 and California PRC Section 5097.98. Following the coroner's and NAHC's findings, the NAHC-designated MLD and the landowner shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in California Public Resources Code Section 5097.94.	LTS	**Finding:** Compliance with Mitigation Measure 4.4-2, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level by notifying the Placer County coroner and the NAHC immediately upon discovery of any human remains during construction activities, according to PRC Section 5097.98and Section 7050.5 of California's Health and Safety Code. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Construction of the proposed project could result in the discovery of human remains. Significant impacts associated with the potential disturbance of human remains would be reduced to a less-than-significant level by ensuring actions would be implemented to avoid, move, record, or otherwise treat the remains appropriately, in accordance with pertinent laws and regulations (Draft EIR, pp. 4.4-14 through 4.4-16)

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
4.5 Geology and Soils			
Impact 4.5-1: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.5-2: Result in substantial soil erosion or the loss of topsoil.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.5-3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.5-4: Be located on expansive soil, creating a substantial risk to life or property.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.5-5: Destroy a unique paleontological resource.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
4.6 Greenhouse Gas Emissions and Climate Change			
Impact 4.6-1: Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
4.7 Hazards and Hazardous Materials			
Impact 4.7-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.7-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release or hazardous materials into the environment.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.7-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes within 0.25 mile if an existing or proposed school.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.7-4: Impair implementation of, or physically interfere with, an adopted emergency evacuation plan or emergency response plan.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.7-5: Expose people or structures to a significant risk of loss, injury, or death involving	**Mitigation Measure 4.7-5: Clear flammable materials within the project site prior to construction.**	LTS	**Finding:** Compliance with Mitigation Measure 4.7-5, which has been required or incorporated into the

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
wildland fires, including where wildlands are located adjacent to urbanized areas or where residences are intermixed with wildlands during project construction.	This mitigation would apply for the Proposed Trail Alignment, Alignment Options 1A, 1C, and 5A. If dry vegetation or other fire fuels exist on or near staging areas, welding areas, or any other area on which equipment will be operated, contractors shall clear the immediate area of fire fuel prior to construction. To the extent feasible, areas subject to construction activities will be maintained free of fire fuel and debris during the course of construction. To avoid impacts to natural resources, areas to be cleared and appropriate clearing methods shall be identified with the assistance of a qualified biologist.		project, will reduce this impact to a less-than-significant level by clearing staging areas, welding areas, or any other area on which equipment will be operated of fire fuel. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Construction of the proposed project could expose people or structures to wildfire risks. Significant impacts associated with construction-related impacts associated with the potential for loss, injury, or death due to wildfire would be reduced to a less-than-significant level by removing fire fuels from construction sites and substantially decreasing the potential for construction activities to ignite a wildfire. (Draft EIR, pp. 4.7-14 through 4.7-15)
Impact 4.7-6: Use-related exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are located adjacent to urbanized areas or where residences are intermixed with wildlands.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
4.8 Hydrology and Water Quality			
Impact 4.8-1: Potential to violate any water quality standards or waste discharge requirements, or to otherwise degrade water quality.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.8-2: Potential to substantially alter existing drainage patterns or to create runoff volume that would exceed the capacity of drainage systems or result in erosion, siltation, or flooding.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.8-3: Alter or redirect 100-year flood flows, or expose people or structures to risk of injury or damage by flood waters.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
4.9 Land Use and Planning			
Impact 4.9-1: Consistency with applicable land use plans.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.9-2: Physically divide an established community.	None required	Beneficial	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
4.10 Noise			
Impact 4.10-1: Short-term construction-related noise.	**Mitigation Measure 4.10-1: Employ Noise-Reducing Construction Practices**	SU	**Finding:** Compliance with Mitigation Measure 4.10-1, which has been required or incorporated into the

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	This mitigation will apply to the Proposed Trail Alignment and Alignment Options 1A, 1C, and 5A. Feasible measures that can be used to limit construction noise include the following: ◢ Locate stationary noise generating construction equipment as far as feasible from noise-sensitive uses. ◢ Do not idle inactive construction equipment for prolonged periods (i.e., more than 5 minutes). ◢ Prohibit unmuffled engine exhaust systems. All construction equipment powered by gasoline or diesel engines shall have factory-installed sound control devices, or sound control devices that are at least as effective as those originally provided by the manufacturer, and all equipment shall be operated and maintained in good working order to minimize noise generation pursuant to Section 9.24.030 of the Noise Ordinance. ◢ The contractor shall provide advance written notification to owners and renters of buildings located within 50 feet of construction activities. The notice shall explain when construction is expected. The notice shall include contact information for the project manager. ◢ When construction occurs outside of the typical daytime and early evening hours (7:00 a.m. – 7:00 p.m. Monday-Friday and 8:00 a.m. – 8:00 p.m. Saturday and Sunday) or within 50 feet of noise sensitive commercial or office buildings, the use of noise-generating construction equipment will be avoided to the extent feasible. When not feasible, construction contractors will specify proposed noise-reducing construction practices or alternative schedules that will be employed to reduce construction noise. Measures specified by the contractors will be reviewed and approved by the City prior to construction activities. In these situations, feasible noise reduction measures include the following: ◤ Alternative construction schedule to minimize disturbance to normal office operations; and/or ◤ Use temporary noise-reducing barriers positioned between noise-generating equipment (including hand operated jack hammers) and the sensitive receptor building. Such barriers may include commercially manufactured noise-insulating blankets/quilts or as equal materials with similar noise reduction performance as		project, would reduce noise impacts associated with construction activities, but not to a less-than-significant level. The City Council, therefore, finds that there are no feasible changes or alterations that could be incorporated into the project to avoid the significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** There are no other feasible mitigation measures or feasible project alternatives that will further mitigate, avoid, or reduce to a less-than-significant level this temporarily significant environmental impact. This City Council chooses to approve the project because, in its view, the economic, social, technological, and other benefits resulting from the project substantially outweigh the significant and unavoidable short-term construction-related noise impact, per the Overriding Considerations described above.

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	approved by the resident engineer. When temporary barrier units are joined together, the mating surfaces shall be flush with each other with no gaps.		
Impact 4.10-2: Long-term increases in use-related noise.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.10-3: Exposure to construction-related groundborne vibrations.	**Mitigation Measure 4.10-3: Reduce exposure to construction-generated ground vibration.** This mitigation will apply to the Proposed Trail Alignment and Alignment Options 1A, 1C, and 5A. Construction documents shall specify construction practices that reduce the adverse effects of ground vibration associated with project construction activities. Measures specified by the design engineer will be reviewed and approved by the City prior to approval of the plans and specifications and may include, but are not limited to, the measures listed below. ◢ Implement Mitigation Measure 4.10-1. ◢ All construction equipment on construction sites shall be operated as far away from vibration- and noise-sensitive sites as reasonably feasible. ◢ Earthmoving, dozing, and ground-impacting operations shall be phased so as not to occur simultaneously in areas close to offsite sensitive receptors, to the extent feasible. The total vibration level produced could be significantly less when each vibration source is operated at separate times. ◢ As part of final design, project engineers shall identify areas on the project plans where work may be constrained due to proximity of structures. The designs shall specify requirements that during project construction on the trail alignment, no heavy vibratory equipment (i.e., the types of equipment listed in Table 4.10-5), shall be operated within 13 feet of off-site building structures unless otherwise approved in writing by the City Engineer. Non-vibratory equipment, such as hand tools, and handheld vibratory compactors and rollers may be used. Use of different material types including slurry cement and concrete paving approved by the Engineer, may be used to reduce or eliminate the need	SU	**Finding:** Compliance with Mitigation Measure 4.10-3, which has been required or incorporated into the project, would reduce ground vibration impacts associated with construction activities, but not to a less-than-significant level. The City Council, therefore, finds that there are no feasible changes or alterations that could be incorporated into the project to avoid the significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** There are no other feasible mitigation measures or feasible project alternatives that will further mitigate, avoid, or reduce to a less-than-significant level this temporarily significant environmental impact. This City Council chooses to approve the project because, in its view, the economic, social, technological, and other benefits resulting from the project substantially outweigh the significant and unavoidable short-term construction-generated ground vibration impact, per the Overriding Considerations described above.

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	for vibratory equipment. Those portions of the project site located within 13 feet of an off-site building structure shall be identified on construction documents and demarcated with stakes, flags, rope and/or markings on the ground. ◢ For Option 5A, locate caisson drilling for Bridge 14 forty-three (43) feet or greater from existing occupied structures, if feasible. ◢ Staging areas shall be adjusted and temporary fencing shall be installed to ensure that loaded trucks shall not operate within 13 feet of existing structures.		
4.11 Public Services			
Impact 4.11-1: Effects on fire protection and emergency services.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.11-2: Effects on police protection services.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
4.12 Recreation			
Impact 4.12-1: Increased use of existing neighborhood and regional parks.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
4.13 Transportation and Circulation			
4.13-1: Safety-related traffic impacts.	**Mitigation Measure 4.13-1: Prepare Traffic Management Plan.** This mitigation would apply for the Proposed Trail Alignment, Alignment Options 1A, 1C, and 5A. The City shall require the construction contractor to prepare for city approval and implement a traffic management plan before construction activities begin.	LTS	**Finding:** Compliance with Mitigation Measure 4.13-1, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level by requiring the preparation and implementation of a traffic management plan. The City

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
	Before the beginning of construction on the project site, the contractor shall prepare a detailed traffic management plan that will be subject to review and approval by the City Department of Public Works. The plan shall ensure maintenance of safe and acceptable operating conditions for local roadways, bicycle and pedestrian facilities, and transit routes. The Traffic Management Plan shall regulate maintenance of traffic during each construction season and comply with agency standards to promote safe and efficient travel for the public and construction workers through the work zones. The plan shall include provisions for regular inspections to assess contractor compliance, signage to direct traffic, and public noticing, as appropriate. Methods in the plan may include (but are not limited to): ◢ appropriately sequencing activities (e.g., segment phasing, timing of grading, hours of construction) to minimize conflicts with traffic on affected roadways, ◢ maintaining traffic flow in the project area to the extent feasible, ◢ maintaining bicycle and pedestrian access along Riverside Avenue, and ◢ using flaggers to direct traffic, as needed, for ingress or egress of large trucks and other vehicles.		Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the potentially significant environmental effect as identified in the EIR. **Explanation/Facts in Support of Finding:** Construction of the proposed project could expose people to safety-related traffic impacts. Significant impacts associated with construction-related traffic impacts would be reduced to a less-than-significant level by preparing a traffic management plan which would include methods by which construction activities will be managed to minimize risk of traffic hazards related to large trucks. (Draft EIR, pp. 4.13-8 through 4.13-10)
4.13-2: Conflict with an applicable plan, ordinance or policy which establishes measures of effectiveness for the performance of the circulation system or with an alternative transportation plan.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
4.14 Utilities			
Impact 4.14-1: Insufficient water supplies available to serve the project from existing entitlements and resources, or result in the construction of new water treatment facilities.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)

Table 2 Selected Project Impacts and Findings of Fact

Impacts	Mitigation Measures	Significance after Mitigation	Findings of Fact
Impact 4.14-2: Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.14-3: Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs or fail to comply with federal, state, and local statutes and regulations related to solid waste.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.14-4: Result in a substantial increase in electrical demand.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)
Impact 4.14-5: Disrupt existing utility service.	None required	LTS	Under CEQA, no mitigation measures are required for impacts that are less than significant. (PRC Section 21002; CEQA Guidelines, Sections 15126.4, subd. (a)(3), 15091.)