CITY OF JACKSON

MITIGATED NEGATIVE DECLARATION

Oro de Amador Remedial Action Plan

November 2024

This Mitigated Negative Declaration has been prepared for a proposed Remedial Action Plan (RAP) for the Oro de Amador Property located in the City of Jackson north of the downtown area between Jackson Gate Road and New York Ranch Road. This Mitigated Negative Declaration provides a description of the potential adverse impacts resulting from the proposed project and provides the reasons why those impacts will have no significant impact on the environment. When a Mitigated Negative Declaration is issued, it indicates that no substantial changes to the physical environment will result from the proposed project when mitigation is applied.

Pursuant to provisions of the California Environmental Quality Act, the City of Jackson has determined that the above-referenced project will not have a significant adverse effect upon the environment and, therefore, does not require the preparation of an Environmental Impact Report.

Documentation supporting this finding is included in the attached Initial Study.

CITY OF JACKSON
INITIAL STUDY OF ENVIRONMENTAL SIGNIFICANCE

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15063 (Initial Study), this Initial Study has been prepared for the proposed Remedial Action Plan (RAP) prepared for the City of Jackson for the proposed cleanup and reuse of the Oro de Amador property.

LEAD AGENCY: City of Jackson
Planning Department
33 Broadway
Jackson, CA 95642

PREPARED BY: Susan M. Peters, AICP
Planning Consultant

PROJECT DESCRIPTION: The City of Jackson City Council is considering adoption of a Remedial Action Plan (RAP). The RAP was developed to evaluate potential remedial alternatives for soil impacted by arsenic and other metals at the city owned Oro de Amador property. The site is approximately 160 acres, a large portion of which was historically used for storing mine tailings from the former Kennedy Mine and for retaining waste from the processing of mine tailings at an onsite cyanide plant.

Preparation of the RAP was funded by Equitable Community Revitalization Grant (ECRG) #2022-00962, awarded to the City of Jackson on July 7, 2022, by the California Department of Toxic Substances Control (DTSC).

The August 2023 Remedial Action Plan can be found on the City of Jackson website: www.ci.jackson.ca.us.

Location: Oro de Amador is generally located in the center of the City between Jackson Gate Road and New York Ranch Road (see Figure 1). The Amador County Assessor's Parcel Numbers for the site are 020-070-031, 020-070-037 and 020-070-040.

The site is mostly vacant with only remnants of mine-related structures including a cyanide plant foundation and tailings dam.

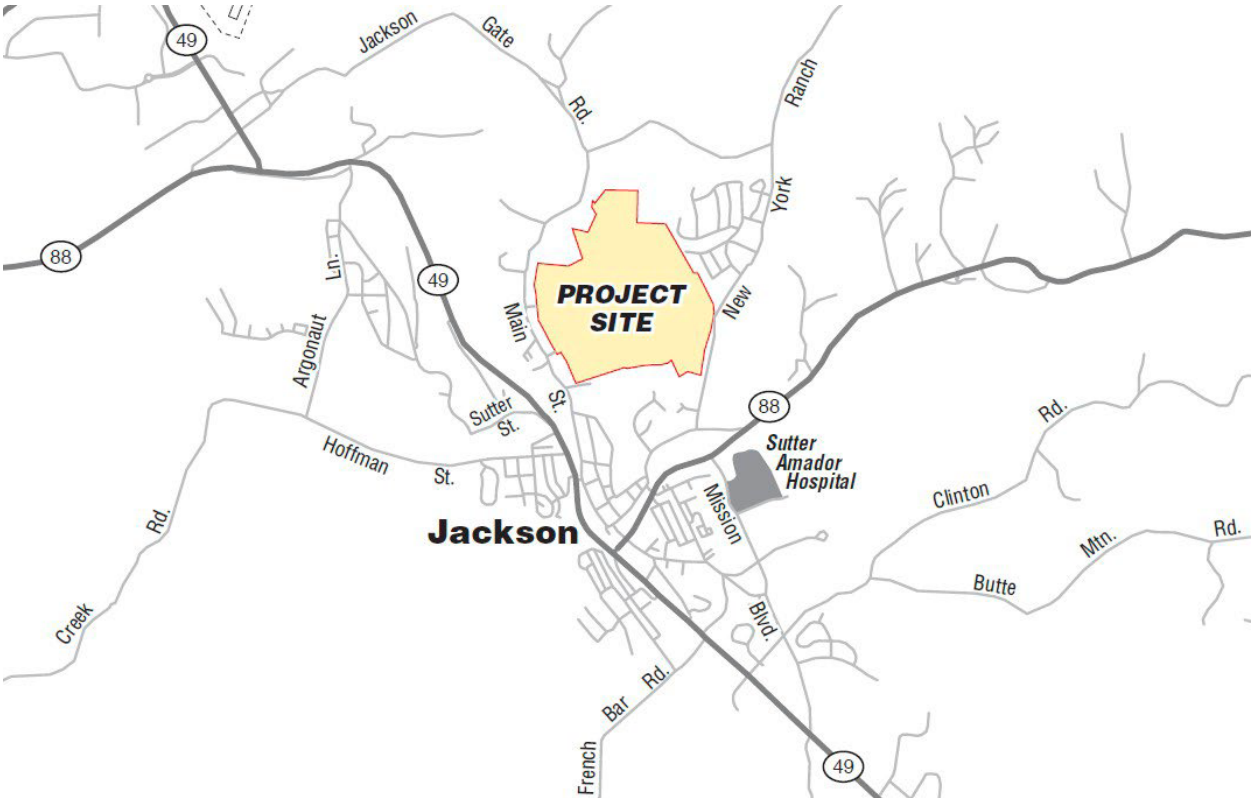

Figure 1: Site Location Map – Source: August 2023 Remedial Action Plan, Geocon Consultants Inc.

Background: The Oro de Amador property was originally the location of the Bell Weather Mine (north central portion of the site) which was active in the 1890s. In 1912, the Kennedy Mining and Milling Company acquired the site and constructed a system to move mine tailings from the Kennedy Gold Mine, approximately one-half mile away, to the site in response to legislation requiring the impoundment of tailings. In 1914, a multi-arched reinforced concrete dam approximately 60 feet high and 600 feet long was constructed across an onsite valley to create an impoundment for tailings. Gold was extracted from the tailings via mercury amalgamation prior to transport to the site.

The Kennedy Mine constructed a 1,000-ton cyanide plant at the site on the ridge west of the tailings dam in 1933 which operated from 1935 to 1939. The plant was constructed as part of an effort to remove additional gold from tailings at the site. Tailings were removed from the area behind the tailings dam, processed through the cyanide leaching plant, and then deposited into piles on the western slope of the process area ridge.

The tailings reprocessing stopped in 1939 but tailings from the Kennedy Mine were deposited at the site until 1942 when the mine ceased operations. Remaining onsite buildings were demolished in the 1940s. Small-scale attempts to extract gold from the tailings were reportedly made between 1948 and 1950. In September 1950, the Kennedy Mining and Milling Company went out of business.

The tailings pile was covered with a layer of soil prior to 1960. The Flintkote Company operated a cement pipe manufacturing plant during the 1960s and reportedly used 36,000 tons of sand from the tailings in their process. An additional 150,000 tons of sand were removed from the southern rim of the tailings in the 1980s and reportedly moved offsite by the Wheels

Development Corporation. There have been no other mining or mineral ore processing activities reported for the site since the 1980s.

The site has been investigated by the California Department of Toxic Substances Control, the United States Environmental Protection Agency (USEPA), the City and private parties during the past three decades. The site is broken down into three contaminated areas (see Figure 2):

1. The Lakebed Area where mine tailings from the off-site Kennedy Mine were impounded.
2. The Cyanide Process Area where the mine tailings were reprocessed.
3. The Tailings Pile where the reprocessed mine tailings were disposed to land.

Except for cattle grazing, the site has remained vacant and inactive since the 1980s. The City of Jackson acquired the property in December 2006.

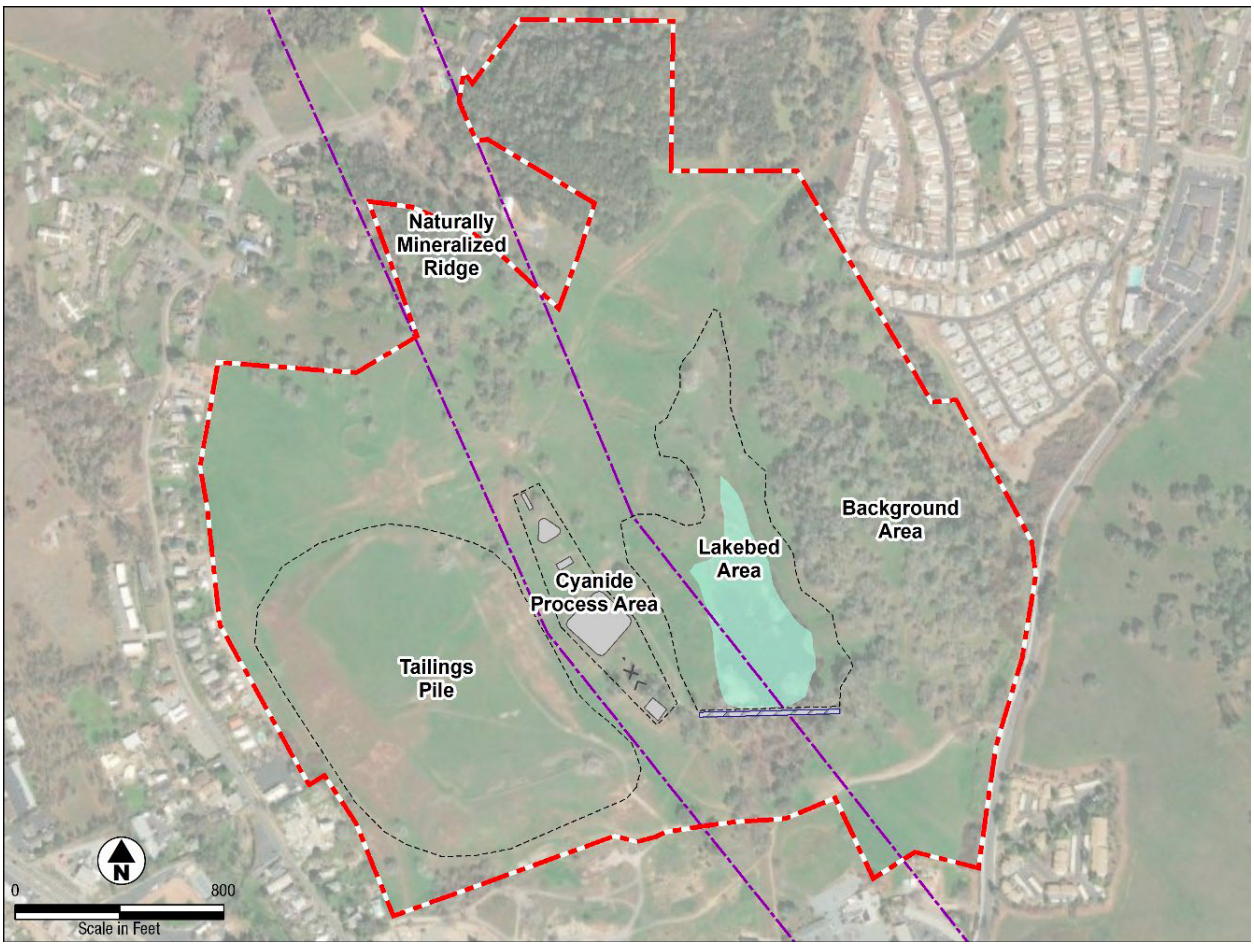

Figure 2: Site Plan – Source: August 2023 Remedial Action Plan, Geocon Consultants Inc.

Surrounding Land Uses: Land surrounding the site is used primarily for residential purposes. Adjoining land uses include residential properties along North Main Street, the St. Sava Serbian Orthodox Church, Amador Senior Center, the Rollingwood Estates residential subdivision, and Jackson Hill Apartments. Land uses within 400 to 1,400 feet from the site include Jackson Elementary School, Amador Residential Care, Jackson Gardens assisted living facility, and Oak Manor Retirement Complex.

Project Objectives: The objectives of the RAP are as follows:

1. Minimize exposure to arsenic and other metals present in mine waste;
2. Minimize the spread of impacted material to adjacent properties; and
3. Facilitate the planned site improvements by covering the chemicals of potential concern-bearing mine waste and/or soil in selected areas as part of the site redevelopment.

Workplan Summary:

The RAP evaluated the following three alternatives:

1. No action;
2. On-site consolidation under land use controls; and
3. Off-site disposal

The No Action alternative does not provide adequate protection of human health and water quality and does not comply with regulatory requirements. For these reasons, the No Action alternative was eliminated from consideration. The Off-Site Disposal alternative is not practical based on the costs and concerns related to truck traffic and associated greenhouse gas emissions.

On-site consolidation includes the excavation of contaminated soil and mine waste from isolated tailings areas; verification of soil sampling and analysis to confirm that the remedial goals have been achieved; and consolidation of the waste and affected soils on-site at the Tailings Pile. Off-site disposal will be required for excavated materials that exceed hazardous waste criteria. Provided that soil verification sampling and analysis results meet the remedial goals, the excavation areas would be suitable for recreational uses. The existing lakebed area and concrete arch dam will remain in place and will be precluded from public access.

After consolidation, the Tailings Pile and surrounding area will be graded to direct surface water runoff away from the Tailing Pile (see Figure 3); drainage infrastructure (berms, ditches, overside drains and detention ponds) will be constructed; and the Tailing Pile will be covered with a clean soil cap to facilitate future recreational use.

The proposed recreational use of the Oro de Amador site is based on a conceptual site utilization plan created in 2011 (see Figure 4) and includes the following improvements:

1. Public recreation facility, including:
    a. Artificial turf fields,
    b. Public parking with solar shade structures,
    c. Raised-bed plantings,
    d. Snack shed,
    e. Restroom facility with on-site sewage disposal (septic disposal field outside of the Tailings Pile),
    f. Lighting, and
    g. Underground utilities (water and electrical connections from offsite and onsite stormwater treatment).
2. Public trail system for non-motorized use, including:
    a. Unpaved hiking and biking trails,
    b. Public trailhead parking with solar shade structure near the site entrance, and
    c. Cattle gates to retain livestock in grazing areas.

3. “Brightfields” solar arrays within the fenced Cyanide Processing Area.

The “Brightfields” listed above is a federal initiative to redevelop former industrial sites (brownfields) like Oro de Amador into brightfields by placing clean energy systems and solar manufacturing facilities on these sites.

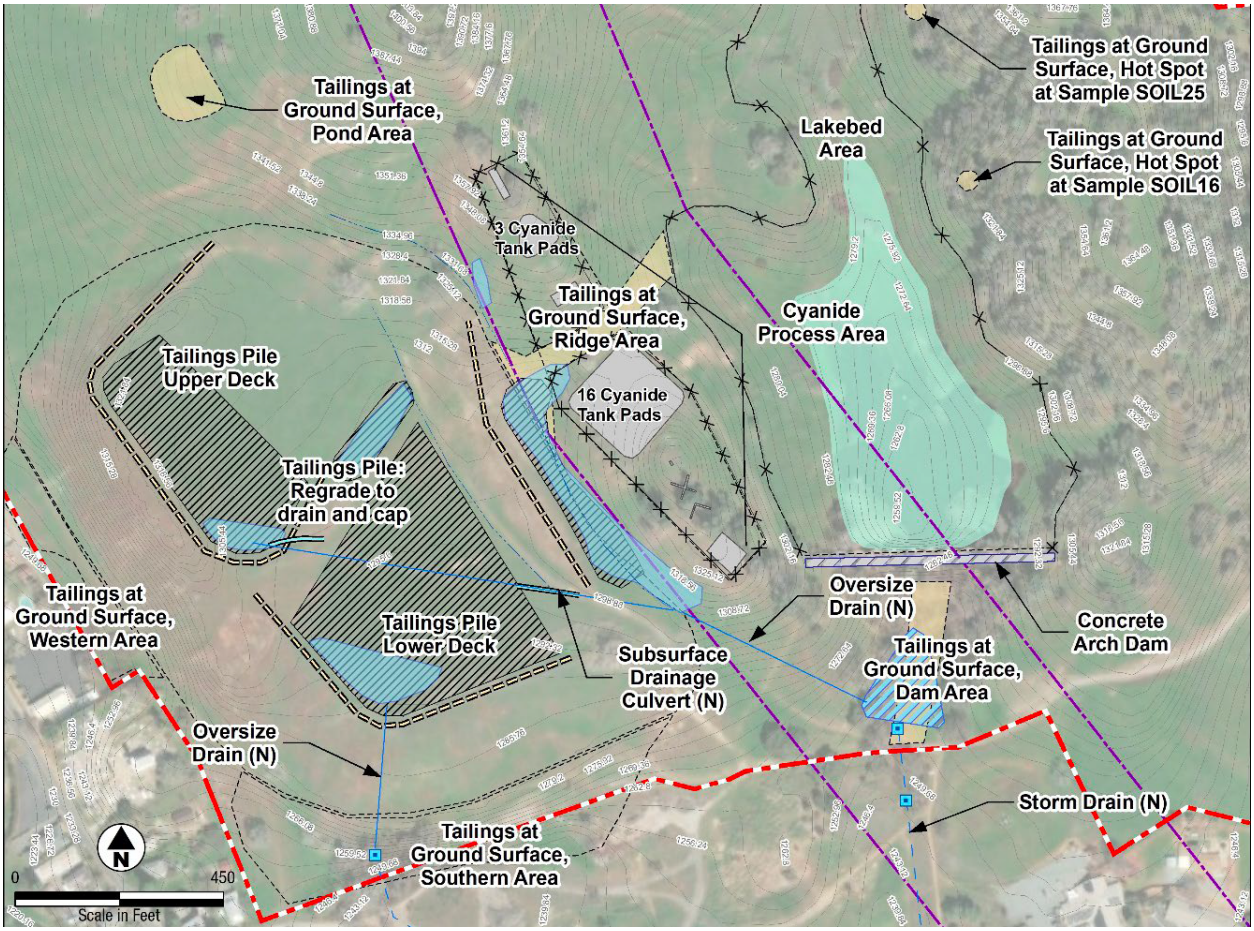

Figure 3: Proposed Remedial Design - Source: August 2023 Remedial Action Plan, Geocon Consultants Inc.

It is expected that the proposed public open space and sports facility will be visited by 500 people per day on average and will relieve pressure and community concerns regarding other existing local sports facilities (e.g., Detert Park and nearby Jackson Jr. High School and Argonaut HS) that are undersized for tournament events.

The “land use controls” portion of the selected alternative are required where waste remains in place at the Lakebed Area, Cyanide Process Area, and Tailings Pile to limit contact with mine tailings and contaminated soil that are to remain on-site, and to restrict future residential use of portions of the site that are remediated to non-residential standard. These controls include the following:

1. A Land Use Covenant is required to memorialize the land use controls.
2. An Operations & Maintenance Agreement is required to set fourth procedures for routine visual monitoring and reporting.

3. Where recreational use is proposed (the Tailings Pile and non-motorized public trail system), the waste must be covered with clean engineered fill and protected from erosion using storm water best management practices.
4. Where waste remains in place without an engineered cover (the Lakebed Area and Cyanide Process Area), fencing and posting are required to restrict public access.
5. Routine monitoring and reporting are to be performed after the remedial action is completed to verify the ongoing protectiveness of the remedial action in the long term.

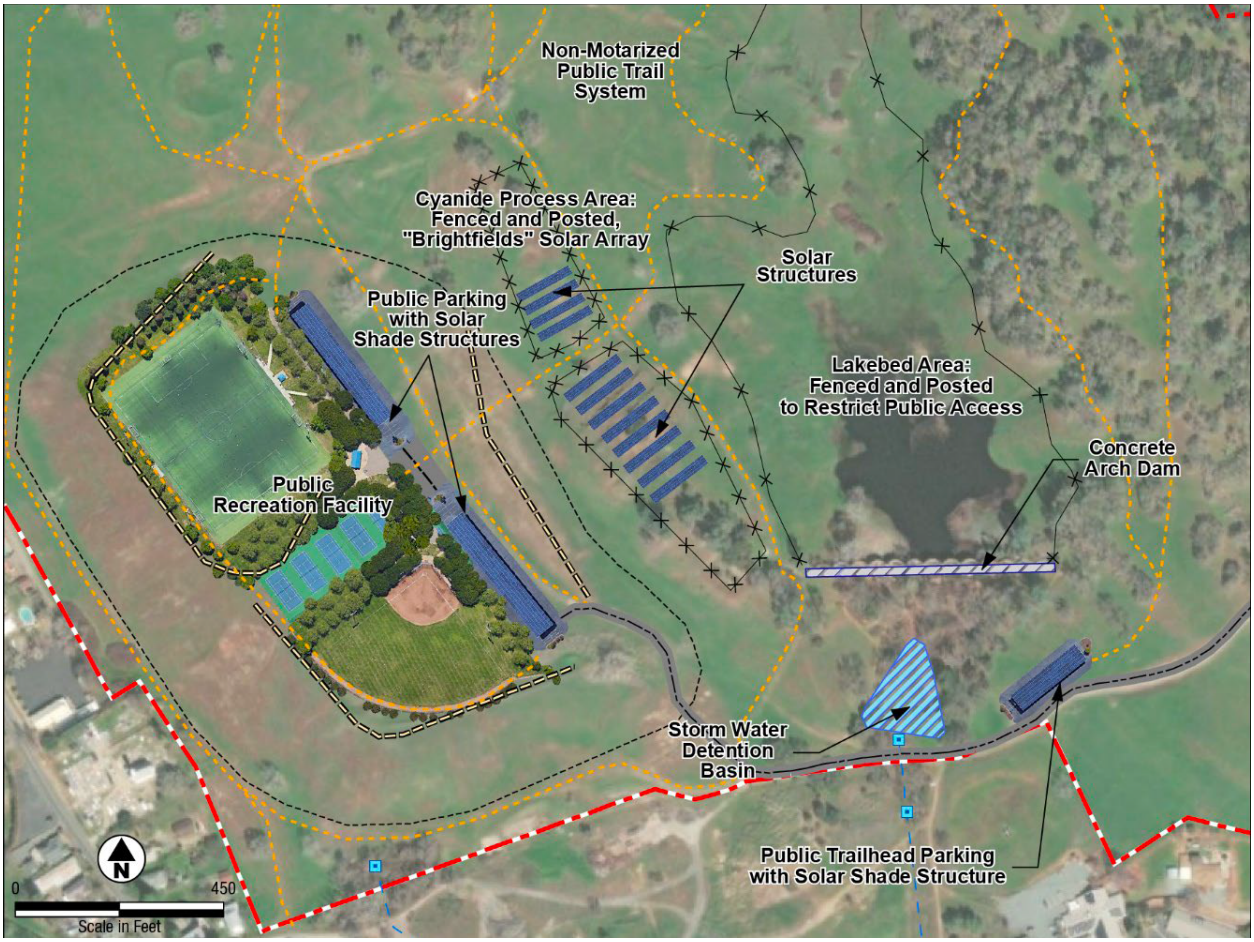

Figure 4: Conceptual Development Plan - Source: August 2023 Remedial Action Plan, Geocon Consultants Inc.

Project Implementation:

Once the Remedial Action Plan is approved by DTSC and the Jackson City Council, city staff will work with DTSC staff to secure funding for plan implementation.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☒ Transportation	☐ Tribal Cultural Resources
☒ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION: On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EVALUATION OF ENVIRONMENTAL FACTORS:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS -- Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Background:

The project site is located in the Visual Corridor as described in the City of Jack General Plan Land Use Element adopted in October 2023. A large portion of the site is visible from Highway 49/88 (not a designated scenic highway) north of the downtown as well as from the Vista Point located immediately north of the City Limit. The portion of the site which is most visible is essentially a plateau that is currently void of any aesthetic features.

Discussion of Impacts:

a) Have a substantial adverse effect on a scenic vista?

The project site is not located in a scenic vista or within a state scenic highway. No Impact.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Implementation of the RAP will cause a short-term adverse effect on the view as a result of the presence of construction vehicles and other equipment and the ground disturbance required to remove earthen materials that exceed hazardous waste criteria. In the long term, impacts are anticipated to be beneficial, with the planting of vegetation and construction of recreational amenities. Less than significant impact.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The proposed project is predominately in a non-urbanized area which is visible from public vantage points. The site is currently unremarkable. The proposed park improvements will have short term aesthetic impacts due to construction, but the completed project will beautify the site and make it more aesthetically pleasing from nearby viewpoints. Less than significant impact.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Some of the park amenities will require lighting, however the City's Development Code, Article III, Chapter 17.43 – Lighting Regulations has regulations in place which, when implemented, will minimize any impact associated with the new light sources. Less than significant impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES— In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Discussion of Impacts:

The project site is not considered Prime, Unique or Important Farmland per the California Resources Agency nor is it under Williamson Act contract. Additionally, the site is not forest or timberland as defined by the Public Resources Code and the Government Code. In recent history the site has been used for cattle grazing. Implementation of the RAP will eliminate some of the existing grazing area however, because of the poor quality on the Tailings Pile where the active park facilities will be located, the loss of grazing land is not considered significant. No impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Background:

The project site is located within the Mountain Counties Air Basin and is under the jurisdiction of the Amador Air District. The Amador Air District has established rules and regulations which are designed to limit emissions generated by various activities and which identify specific pollution reduction measures that are to be implemented in association with various activities. Specifically, the Air District has promulgated Rule 218 for control of fugitive dust emissions during a variety of activities including construction. The rule defines fugitive dust as follows: "Fugitive dust for the purposes of this rule is also defined as the particulate matter entrained into the air which is caused from man-made and natural activities which is emitted into the air without first passing through a stack or duct designed to control flow, including, but not limited to, emissions caused by movement of soil, vehicles, equipment, and windblown dust." The intent of the rule is to control dust by water application, pavement, vegetation, etc. so that no visible dust is created. Violation of the rule could result in issuance of a notice of violation and assessment of penalties.

Discussion of Impacts:

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Amador County has not formally adopted an air quality management plan. While it is typical for the local air district to develop regional thresholds of significance for projects, in terms of criteria air pollutants the Amador Air District has not formally adopted recommended thresholds of significance for the evaluation of proposed projects that are subject to CEQA review. The Air District relies on its adopted rules and regulations to guide the analysis of air quality impacts

associated with criteria pollutants that could be generated during construction and operation of projects such as that proposed under the RAP. No impact.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The project consists of capping of mine waste in selected areas of the site (the proposed sports fields, public access trails, road, and parking areas) with clean fill material, synthetic surfaces, and/or asphalt pavement on the road and parking areas. The capping process will require earthmoving equipment and techniques which have the potential to emit or cause to be emitted air pollutants including fugitive dust and airborne constituents of concern. Application of Amador Air District Rule 218 calls for those portions of the Site that will be disturbed by grading and construction equipment to be thoroughly wetted in advance of disturbing activities. Then, during grading and construction, additional water will be applied to control dust. There is no ambient air quality standard for arsenic, however thorough water application to control dust will also prevent arsenic from becoming airborne. In addition, earthmoving activities will occur for a short period only during the time mine waste materials are capped; post-construction activities (recreation, hiking, parking, etc.) do not have the potential to cause significant airborne emissions and/or violate air quality standards. Less than significant impact.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Amador Air District Rule 218 for control of fugitive dust emissions will be applied to those portions of the Site that will be disturbed by grading and construction equipment. As required under the existing regulations, areas scheduled for disturbance will be thoroughly wetted in advance of ground disturbing activities, and during grading and construction additional water will be applied to control dust.

Arsenic contributes over 99% of the calculated health risk to various receptors including recreational users, construction workers and outdoor workers (e.g. maintenance workers) (Geocon, 2015). The project's heath risk assessment calculated excess health risks to various receptors based on current site conditions (i.e. prior to capping of mine wastes as proposed under the RAP). The project consists of capping portions of the mine wastes on site, thereby eliminating pathways of exposure to arsenic in areas to be accessed by the public.

Implementation of Amador Air District Rule 218 during construction, together with implementation of mine waste capping activities as described in the RAP, will effectively reduce or eliminate the exposure of sensitive receptors to significant pollutant concentrations. Less than significant impact.

d) Would the project create objectionable odors affecting a substantial number of people?

Neither the state nor federal governments have adopted rules or regulations for the control of odor sources. The Amador Air District (AAD) does not have an individual rule or regulation that specifically addresses odors; however, odors would be applicable to AAD Rule 205, Nuisance. Any actions related to odors would be based on citizen complaints to local governments and to the Amador Air District. The AAD has not identified recommended significance thresholds for the evaluation of odor impacts associated with proposed projects that are subject to CEQA.

Activities associated with the project are primarily associated with earthmoving, including the importation of clean mineral fill (clean soil or aggregate base), synthetic materials or asphalt to cap mine wastes. With the exception of short-term odor generating potential associated with construction equipment and haul trucks, long-term odor generation is not anticipated from the project. Odor complaints, if any, will be addressed on a case-by-case basis in accordance with AAD Rule 205 and local ordinances. Less than significant impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL -- Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Background:

A biological survey done by Geocon in May, 2015 shows the project site consists of three broad habitat types:

1. *Disturbed or mining-impacted areas in and surrounding the tailings pile area and the tailing processing area near the center and in the western portion of the site;*
2. *Less disturbed woodlands and grasslands on the northern and eastern portions of the site; and*
3. *Emergent wetlands of the lakebed area in the southern and central portion of the site.*

The survey of these three communities characterizes them according to their California Department of Fish and Wildlife (CDFW) vegetation classifications. These habitat associations are mapped on Figure 5 and the dominate plant species for each habitat type is summarized in Table 1. The habitat types include:

1. *Disturbed historic mining areas. These areas total approximately 110 acres and consist of historical waste rock piles, structure foundations (i.e., the former cyanide plant foundations and the Bell Weather Mine). The historical mining areas are covered by waste rock and tailings and have been graded, littered with scattered junk piles, and heavily invaded by introduced grass/weed species, like ripgut brome (Bromus diandrus), soft chess (B. hordeaceus), and slender wild oat (Avena barbata). These areas are best described as "ruderal" or disturbed and cannot be categorized using a natural California habitat association. The tree cover for these areas consists of a few interior live oaks (Quercus wislizenii).*
2. *Foothill pine/interior live oak/whiteleaf manzanita. Much of this habitat at the site, which comprises approximately 45 acres, was not likely used during historical mining activities, but for later cattle grazing. Interior live oaks are present within this area as well as a few foothill pine (Pinus sabiniana). Understory shrubs are limited due to cattle grazing, but observed species included: toyon (Heteromeles arbutifolia) and whiteleaf manzanita (Arctostaphylos manzanita). Like the neighboring mine-impacted areas, this habitat supports a number of introduced plant species that are indicative of anthropogenic influence and common to disturbed areas.*
3. *Palustrine. This emergent wetland habitat covers approximately 6 acres and was created by the construction of the tailings dam in the 1930's. Typical warm-water emergent wetland vegetation, creeping wildrye (Leymus triticoides) rushes (Juncus spp.), sedges (Carex spp.) was identified in this area. Cattails were not observed. One elderberry bush was identified on the edge of this habitat.*

The CDFW's California Natural Diversity Database (CNDDB) was queried with a 10-mile radius around the site to determine the potential occurrence of special-status species in the site's vicinity. The following special-status plant species, which are mostly endemic to soils derived from serpentinite and gabbro, were identified within a 10-mile radius of the site:

- *Bisbee Peak rush-rose (Helianthemum suffrutescens)*
- *Ione manzanita (Arctostaphylos myrtifolia)*
- *Ione buckwheat (Eriogonum apricum var. apricum)*
- *Parry's horkelia (Horkelia parryi)*
- *Red Hills soaproot (Chlorogalum grandiflorum)*

The following animal species of special concern were identified within a 10-mile radius of the site:

- *Alameda whipsnake (Masticophis lateralis euryxanthus)*
- *Giant garter snake (Thomnophis gigas)*
- *Rudolph's cave harvestman (Banksula rudolphi)*
- *Northwestern pond turtle (Clemmys marmorata)*
- *Valley elderberry longhorn beetle (Desmocerus californicus dimorphus)*

No special-status species have been formally identified at the site, but the Western Pond Turtle (Emys marmorata) may be present in the pond behind the tailings dam. This species of turtle is thoroughly aquatic and requires habitat that contains ponds, marshes, rivers, streams, and irrigation ditches, with aquatic vegetation, below 6,000 feet in elevation. Specifically, this species needs basking sites and suitable upland habitat (sandy banks or grassy open fields) up to 0.5 kilometer of water for egg-laying.

The site does support some mature oak woodland. Regardless of the relative habitat quality of oak woodlands on the former mine site, all trees over 8 inches diameter at breast height (DBH) are protected by the City of Jackson Development Code, Article III, Chapter 17.40 Landscape Standards. This ordinance requires Planning Commission approval for removal of any tree over 8 inches DBH and replacement at a three to one ratio for removal of trees over 16 inches DBH. Oak trees are to be replaced with oaks at a ratio of three to one.

Table 1
Site Habitats and Ecological Receptors

Habitat Type	Approx Area (Acres) (% Site)	Representative Species	Observed Species	Relative Occurrence	Rare, Threatened or Endangered
Disturbed Historic Mining Area/Grass	110 (68%)	Plants	Various species (1)	Moderately abundant	No
		Soil invertebrates	None	Unknown	No
		Deer mouse	None	Unknown	No
Mixed Oak-Pinas sabiniana/grass	45 (28%)	Plants	Various species (2)	Moderately abundant	No
		Soil invertebrates	None	Unknown	No
		Scrub Jay	Kill deer, acorn woodpecker	Unknown	No
		California Grey Squirrel	California Grey Squirrel	Unknown	No
Palustrine – Emergent Wetland	6 (4%)	Plants	Various species (3)	Moderately abundant	No
		Benthic invertebrates	None	Unknown	No
		Amphibians	Sierra Tree Frog	Abundant	No
		Migratory Waterfowl	Unidentified duck, cattle egret, red-tailed hawk	Unknown	No
		Raccoon	None	Unknown	No

(1) Interior Valley Oak
(2) Foothill Pine, Interior Valley Oak, Blue Oak
(3) Rushes, sedges, deergrass

Discussion of Impacts:

The areas of the site to be impacted by the RAP are those with the greatest concentrations of arsenic which is predominately in the tailings pile area. This area of the site is virtually void of

vegetation with the exception of sparse, non-native grasses. The RAP mitigation is to cover this area with clean base material, soil, or asphalt in specific, access-controlled areas of the site. The RAP proposes that the bulk of the Lakebed Area in the location of the tailings dam and the foundations of the former cyanide plant be restricted from public access. This is also the mitigation for the remaining structures in the Bell Weather Mine area. Fencing and signage will be posted around these more heavily contaminated areas.

Because the RAP capping/coverage mitigation is located predominantly in non-vegetative areas, and those areas with existing vegetation are to be avoided by direct development, there is no anticipated impact to species identified as candidate, sensitive, or special status, riparian habitat, or protected wetlands. No Impact.

The CDFW's California Natural Diversity Database (CNDDB) was queried for the Jackson Quad to determine the potential occurrence of special-status species in the site's vicinity. One Federally listed threatened species was identified - Valley Elderberry Longhorn Beetle (Desmocerus californicus dimoprphus). No special-status plant species were identified in Jackson Quad. Two animal Species of Special Concern were identified – Tricolored Blackbird (Agelaius tricolor) and Western Pond Turtle (Emys marmorata).

One elderberry bush, not enough to be considered habitat, was located on the site near the Lakebed Area (see Figure 5). There is no development proposed in the vicinity of the bush.

The site has no wetland areas but does support a small area of mature oak woodland. Regardless of the relative habitat quality of oak woodlands on the site, all trees over 8 inches diameter at breast height (DBH) are protected by the City of Jackson Development Code, Article III, Chapter 17.40 Landscape Standards. This ordinance requires Planning Commission approval for removal of any tree over 8 inches DBH and replacement at a three to one ratio for removal of trees over 16 inches DBH. Oak trees are to be replaced with oaks. Less than significant impact.

The City of Jackson does not have an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As such, the RAP does not conflict with any such plan. No impact.

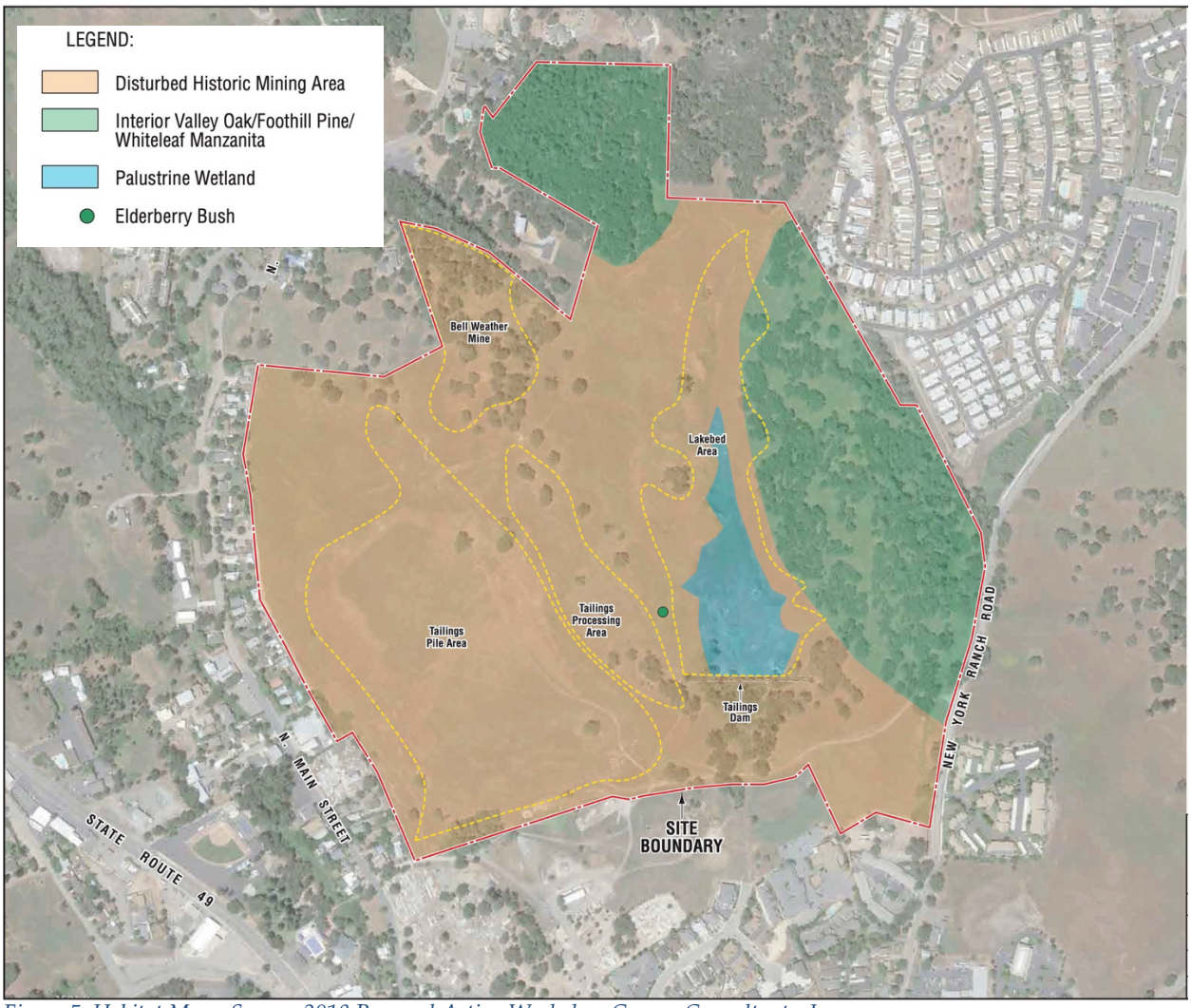

Figure 5: Habitat Map - Source: 2018 Removal Action Workplan, Geocon Consultants, Inc.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES -- Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Background:

The Oro de Amador site has a variety of resources pertaining to historic use of the property for gold mining. These historical resources include footings from the 1,000-ton cyanide plant, the cyanide tank and an impoundment dam constructed in 1914. There is also a mine shaft on the property which was part of the original Bell Weather Mine (established in the 1890s).

Discussion of Impacts:

None of these resources listed above will be impacted by the RAP as all of these sites will be avoided. Furthermore, the areas to be covered do not contain known paleontological resources or unique geologic features as these areas were previously covered with mine tailings. No impact.

There are no known human remains on the site. Implementation of the RAP by covering areas of the site or fencing to not allow access will ensure that any unknown human remains will not be disturbed. No impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY -- Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion of Impacts:

At present, there are no energy demands for the site. Temporary increases in energy use (i.e. fuel) would be required during any future construction activities. Project energy use during future recreational operations would primarily consist of energy consumption for space heating and cooling, use of appliances and transportation energy use associated with increases in vehicle trips to and from the site. All building energy needs would be met by electricity supplied by Pacific Gas and Electric. Project construction would be temporary and minor in terms of energy use. Compliance with CCR Title 24 Energy Efficiency Standards would result in an energy-efficient building.

Additionally, the proposed "Brightfield" solar fields will produce sufficient energy to offset some, if not all, electrical energy needs for recreational operations. For these reasons the project's energy impacts are considered less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS -- Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) 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?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Background:

The Site is located in the Mother Lode region of the western foothills of the Sierra Nevada Geomorphic Province. The western foothills are bounded by the Sierra Nevada to the east and the Central Valley to the west.

The Site is in the Melones Fault Zone, an inactive fault system separating Paleozoic limestone and Mesozoic granitic intrusive rocks of the Sierra Nevada Mountains to the east, from metamorphic and volcanic rocks to the west. Review of the Geologic Map of the Sacramento Quadrangle indicates that the Calaveras Formation, which is present on the eastern part of the site, consists of a series of highly foliated metasedimentary and metavolcanic rocks. The Mariposa Formation is present in the western portion of the Site and consists of black slate interbedded with argillaceous metasedimentary rocks. The mineralized zone of the Melones Fault Zone, located in the center of the Site, is a thin band of highly altered rock that trends northwest.

Native soil observed at the Site consists of brown silty sand with cobbles of volcanic rock. Native soil is classified as Auburn silty loam in the USDA's Soil Survey, Amador Area, California. This soil is described as dark reddish brown to yellowish red. Depth to bedrock ranges from 12 to 22 inches. The soil is well-drained, with a moderate permeability. Runoff is slow to very rapid with the potential erosion hazard being very severe.

Mine waste on the Site consists of waste rock and coarse- to fine-grained tailings. Waste rock was encountered in trenches excavated around the Site during the investigation conducted by Dames & Moore in the early 1990s. During a site visit conducted in May 2015, Geocon observed piles of waste rock south of the Tailings Pile Area and in the northern portion of the Lakebed Area. Geocon also observed tailings in the Lakebed Area. The waste rock consists of dark gray gravel, cobble, and boulder size slate with some white veins of microcrystalline quartz. The tailings consisted of gray silty sand and light gray silty clay.

Adapted from Draft Removal Action Workplan; Oro de Amador Site, Jackson, California (Geocon, September 2015). Original sources cited in the RAP include:

1. *California Division of Mines and Geology (CDMG), Mineral Land Classification of the Sutter Creek 15 Minute Quadrangle, Amador and Calaveras Counties, California; CDMG Open File Report 83-36, 1981;*
2. *CDMG, Geologic Map of the Sacramento Quadrangle, 1:250,000, 1981; and*
3. *United States Department of Agriculture (USDA), Soil Conservation Service, Soil Survey of Amador Area, California, September 1965.*

Discussion of Impacts:

a) Would the project 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 including liquefaction, or landslides?

The project site is located in a seismically inactive area, therefore the potential for risk associated with earthquakes, ground shaking, or seismic-related failure is minimal. No impact.

b) Would the project result in substantial soil erosion or the loss of topsoil?

The project consists of capping of mine waste in selected areas of the site (the proposed sports fields, trails, road, and parking areas) with clean fill material, synthetic surfaces, and/or asphalt pavement on the road and parking areas. By their nature, project activities will serve to reduce, rather than result in, erosion potential or the loss of topsoil. Project activities will require professionally prepared erosion and sedimentation plans and the placement and maintenance of Best Management Practices (BMPs) intended to ensure existing erosion and sedimentation are reduced or eliminated. Less than significant impact.

c) Would the project 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?

Mine waste in selected areas of the site (the proposed sports fields, trails, road, and parking areas) will be capped with clean fill material, synthetic surfaces, and/or asphalt pavement on the road and parking areas. The capping of mine wastes will occur in areas of the site that are stable and most such areas have been graded and re-graded historically. Likewise, the capping of mine wastes does not in itself have the potential to cause the instability or failure of existing soils. No impact.

d) Would the project be located on expansive soil?

The area of mine waste capping will be partially on soils of the Auburn soil series and partially on mine waste. Neither material (Auburn soil or mine waste) is considered to be an expansive soil by the California Building Code. In addition, no human occupation will occur on the site, therefore the exposure of life or property to the negative results of expansive soils will not occur. No impact.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The site will utilize the City's wastewater collection and treatment system. No impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS -- Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases?	☐	☐	☐	☒

Background:

The project site is located within the Mountain Counties Air Basin and is under the jurisdiction of the Amador Air District. The Amador Air District has established rules and regulations which are designed to limit emissions generated by various activities and which identify specific pollution reduction measures that are to be implemented in association with various activities.

Discussion of Impacts:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

At present, there are no emissions generated at the site. Temporary increases in energy use (i.e. fuel) would be required during any future construction activities. Project energy use during future recreational operations would primarily consist of energy consumption for space heating and cooling, use of appliances and transportation energy use associated with increases in vehicle trips to and from the site. These energy needs would result in an increase in greenhouse gas emissions. All building energy needs would be met by electricity supplied by Pacific Gas and Electric. Project construction would be temporary and minor in terms of energy use. Compliance with CCR Title 24 Energy Efficiency Standards would result in an energy-efficient building.

Additionally, the proposed "Brightfield" solar fields will produce sufficient energy to offset some, if not all, electrical energy needs for recreational operations and proposed activities for implementation of the RAP will comply with applicable Amador Air District rules and best management practices. With the solar field improvements, implementation of the Air District rules and compliance with Title 24 the greenhouse gas emission impacts from the proposed project are considered less than significant. Less than significant impact.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases?

The City of Jackson does not have regulations regarding the reduction of greenhouse gas emissions. No impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Background:

The project consists of the capping of mine waste in selected areas of the site (the proposed sports fields, trails, road, and parking areas) with clean fill material, synthetic surfaces, and/or asphalt pavement on the road and parking areas. The project will not involve the off-site movement or handling of mine waste, but rather the importation of clean fill and other materials (asphalt, etc.) for covering of mine waste materials. Fill materials will be inspected and tested if

necessary, prior to transport to confirm that they do not contain hazardous substances exceeding screening or background levels for constituents of concern. A Soil Transportation Plan and Stormwater Pollution Prevention Plan will be prepared and implemented prior to construction.

Following construction, a Land Use Covenant and Operation & Maintenance agreement will be recorded to limit the types of future land uses allowed on the site and to prescribe procedures for maintenance and handling of mine wastes in the event they are exposed in the future by site activities or natural processes. Future recreational activities and uses at the site will be subject to the limitations and provisions of both the Land Use Covenant and the Operation & Maintenance agreement.

Discussion of Impacts:

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The project will not cause the movement of hazardous materials (e.g. mine wastes) from the site, but instead intends to cap such materials in place. No transportation, use or disposal of hazardous materials is anticipated to occur. However, off-site disposal of hazardous materials shall be required should excavated materials exceed hazardous waste criteria. This will be determined once remedial work begins – if required, excavated materials will be transported under existing regulations to ensure no hazards to the traveling public. Provided that soil verification sampling and analysis results meet the remedial goals, the excavation areas will be suitable for recreational uses. Recreational uses at the site will not routinely cause the transportation, use or disposal of hazardous materials. Less than significant impact.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The project site is located approximately one-quarter mile north and west of the Jackson elementary school and approximately one-quarter mile north and east of the Jackson junior high school. Implementation of the project will likely disturb, to some degree, existing mine waste materials which has the potential to create dust containing elevated levels of arsenic and other constituents of concern.

The Amador County Air Pollution Control District (ACAPCD) has promulgated Rule 218 for control of fugitive dust emissions during a variety of activities including construction (http://www.arb.ca.gov/drdb/ama/curhtml/r2l8.htm). The rule defines fugitive dust as follows: "Fugitive dust for the purposes of this rule is also defined as the particulate matter entrained into the air which is caused from man-made and natural activities which is emitted into the air without first passing through a stack or duct designed to control flow, including, but not limited to, emissions caused by movement of soil, vehicles, equipment, and windblown dust." The intent of the rule is to control dust by water application, pavement, vegetation, etc. so that no visible dust is created. Violation of the rule could result in issuance of a notice of violation and assessment of penalties.

To comply with this rule, portions of the Site that will be disturbed by grading and construction equipment will be thoroughly wetted in advance of disturbing activities. Then, during grading and construction, additional water will be applied to control dust. There is no ambient air quality standard for arsenic. However, thorough water application to control dust will also prevent arsenic from becoming airborne. Less than significant impact.

d) Is the project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The project site is listed on the State's designated list of hazardous waste substances sites (the Cortese list) under Envirostor ID no. 03100004. Pursuant to a voluntary cleanup agreement the project proposes to implement a Remedial Action Plan (RAP) to cover historic mine wastes in an effort to isolate mine waste hazards from public exposure. Implementation of the RAP will eliminate hazards to the public and environment by capping mine waste materials onsite. No impact.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

According to the Airport Land Use Plan for Westover Field, Adopted October 1987 and amended July 1990, the project site is outside all Airport Safety Areas. No Impact.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The proposed project would not result in temporary rerouting of vehicular traffic or decrease the number of travel lanes. Furthermore, emergency access to the project site will be improved as a result of implementation of the RAP. No impact.

g) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Implementation of the RAP and the proposed park facility will involve the extension of water service to the site which will lower the risk of loss due to potential wildland fires. The residences on the west side of the project site will also have a reduced risk due to the reduction in unmanaged grass lands. No impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY -- Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces in a manner which would;				
(i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Background:

Groundwater in the foothills of the Sierra Nevada typically occurs within fractured bedrock. Perched groundwater may also be present in shallow alluvium overlying bedrock. Dames & Moore reported that during their investigation in 1993, groundwater was encountered at depths from 30 to 60 feet while drilling five site monitoring wells; however, several lenses of perched water were documented in soil borings completed at the Site. The perched lenses ranged in thickness from 9 to 15 feet, and were of an unknown total area (Dames & Moore, 1995).

LFR, Inc. (LFR) performed groundwater monitoring during their targeted site investigation conducted in 2009. Depth to groundwater ranged from 11.49 feet to 42.81 feet. Groundwater elevation data indicate that the groundwater flows to the south with a calculated gradient of approximately 0.05 foot/foot.

Adapted from Draft Removal Action Workplan; Oro de Amador Site, Jackson, California (Geocon, September 2015). Original sources cited in the RAP include:

1. *Dames & Moore, 1995, Final Environmental Assessment, Kennedy Mine Tailing Site, Jackson, California;*
2. *LFR, Inc., 2009, Final Targeted Site Investigation, Oro de Amador, Jackson, California.*

Discussion of Impacts:

a) Would the project violate any water quality standards or waste discharge requirements?

The USEPA establishes national water quality standards. Pursuant to Section 402 of the Clean Water Act, the USEPA has also established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct stormwater discharges. Because the project will disturb more than one acre of land, coverage will be required under the General Permit for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities (the Construction General Permit). Prior to construction, a Storm Water Pollution Prevention Plan (SWPPP) will be prepared and implemented as required by the General Permit. In addition, grading plans will be professional prepared and will include erosion and sediment control Best Management Practices (BMPs) in accordance with City of Jackson code requirements. Implementation of the SWPPP and local erosion and sediment control BMPs will minimize the potential for short-term construction-related water quality impacts resulting from sediment-laden surface water run-off. Less than significant impact.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level?

Neither the mine waste material capping project nor subsequent recreational activities at the site propose ground water extraction, as municipal potable water is available at the site. Most mine waste materials will be capped with clean soil or aggregate base fill which is permeable and will not significantly impede the vertical movement of precipitation and runoff to groundwater recharge. Other areas will be covered with synthetic materials or asphalt concrete/concrete pavement which will impede the vertical movement of water, however these areas are proportionally small so their effect on overall, local and regional groundwater recharge is considered to be minimal. Less than significant impact.

c) Would the project Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces in a manner which would; result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

Future construction on the project site will require professionally prepared grading and drainage plans which are reviewed and approved by the City Engineer. As required under existing regulations, drainage plans will be required to demonstrate that project-related drainage improvements will ensure that post-project runoff quantities will not exceed pre-project quantities. By doing so, substantial erosion, siltation or flooding on- or off-site will not occur. Less than significant impact.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Implementation of the project will require professionally prepared grading and drainage plans which are reviewed and approved by the City Engineer. As required under existing regulations, drainage plans will be required to demonstrate that project-related drainage improvements will ensure that post-project runoff quantities will not exceed pre-project quantities. By doing so, substantial erosion, siltation or flooding on- or off-site will not occur. Less than significant impact.

The project consists of capping of mine waste in selected areas of the site (the proposed sports fields, trails, road, and parking areas) with clean fill material, synthetic surfaces, and/or asphalt pavement on the road and parking areas. Project activities will require professionally prepared erosion and sedimentation plans and the placement and maintenance of Best Management Practices (BMPs) intended to ensure erosion and sedimentation are reduced or eliminated. By their nature, project activities will serve to reduce, rather than increase, the exposure of pollutants to precipitation and runoff and as a result the project is expected to increase the quality of water leaving the site. Less than significant impact.

The project site is depicted on FEMA Flood Insurance Rate Map (FIRM) no 06005C0557F. A fairly large part of the east-central portion of the property is shown as being subject to the 1% annual chance flood. This area is associated with the lakebed area and the drainage course that directs runoff into and out of the lakebed area. No project activities are proposed in the portion of the site designated as being subject to the 1% annual chance flood. No impact.

The project site contains a historic tailings impoundment, however the impoundment has been largely cleared of retained debris (mine tailings), therefore failure of the structure would not release a significant quantity of water or retained debris (if any). No impact.

The site is not located near lakes or reservoirs; therefore the site is not subject to seiche hazards. The site is approximately 95 miles from the Pacific Ocean, well outside of the Tsunami Hazard Zone. Impounded tailings behind the historic impoundment dam have been largely removed and reprocessed, and reprocessed tailings have been placed and graded elsewhere on the site in such a manner that they are stable and represent no potential for mudflow deposition. Project-related activities (recreation, parking, hiking trails) are not expected to increase or affect mudflow potential at the site. No impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING - Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Background:

The project site is General Plan designated and zoned Recreation with a Planned Development/Open Space Overlay. This means that the base use is recreation with areas of open space.

Discussion of Impacts:

a) Physically divide an established community?

The project site is currently vacant so there is no community to divide. No impact.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Implementation of the RAP and the future use of the site for public hiking trails and recreational fields is consistent with the recreation and open space designation and zoning. No impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Background:

Federal, state and local agencies regulate or maintain documents regarding the presence of mineral resources. The State Geologist, California Geological Survey, and the State Mining and Geology Board (SMGB) provide assistance and direction with regard to mineral resources. The mineral land classification system is designed to provide local government agencies with information regarding the presence or likely occurrence of mineral deposits contained beneath land within their jurisdiction. Future land-use policy decisions made for land within the study area can be made with a better understanding of underlying mineral significance or potential.

The project site is covered by the Mineral Land Classification of the Sutter Creek 15 Minute Quadrangle, Amador and Calaveras Counties, California (California Division of Mines and Geology Open File Report 83-36; 1981). The SMGB uses a classification system that divides land into four Mineral Resource Zones (MRZ) based on quantity and significance of mineral resources. The project site is designated MRZ-2a, or an area classified as containing significant measured or indicated mineral reserves. This designation is consistent with the known historic mining that occurred in the area, and from the waste materials that occupy a portion of the project site.

Discussion of Impacts:

a) Will the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Will the proposed project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

The project consists of the capping of mine waste in selected areas of the site (the proposed sports fields, trails, road, and parking areas) with clean fill material, synthetic surfaces, and/or asphalt pavement on the road and parking areas. The project does not propose to remove from the site or affect any known mineral resources. In addition, the City of Jackson owns the surface rights but not the mineral rights below approximately 500 feet (mineral rights below 500 feet, and in certain cases less than 500 feet, are reserved by others). For this reason extraction of mineral resources may still occur beneath the project site without interference from or to the proposed recreational activities or improvements. Finally, the project does not propose occupation of the site by humans, but rather incidental and periodic short-term use for recreational activities only. Sensitive receptors (e.g. human occupation) will not occur on the site therefore interference between potential future mineral extraction and sensitive receptors is not expected. No impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE -- Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project to excessive noise levels?	☐	☐	☐	☒

Discussion of Impacts:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

In accordance with the City's noise ordinance, all site work will be completed between the hours of 7:00 am and 9:00 pm on any day except Sunday, and between 9:00 am and 6:00 pm on Sunday. Construction activities during mine waste capping and site development have the potential to generate short-term increases in noise, however based upon historic experience with construction-related traffic and noise, the City does not anticipate off-site objectionable noise levels to be associated with this project. Post-construction noise will be associated with episodic passenger vehicles, an occasional bus, and human voice related to sports and recreational activities. Similar temporary increases in ambient noise levels at other sports and recreation facilities in the City have not resulted in violations of the noise standards in the noise ordinance. Less than significant.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Neither the project's construction nor post-construction activities will include activities likely to produce significant or excessive groundborne vibration or noise (e.g. blasting, impact pile driving, etc.) that would exceed regulatory standards. Conventional construction and recreational activities do not produce excessive groundborne vibration or noise. No impact.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or

public use airport, would the project expose people residing or working in the project to excessive noise levels?

According to the Airport Land Use Plan for Westover Field, Adopted October 1987 and amended July 1990, noise contours associated with airport operations are oriented northeasterly and parallel with the runway. The 60db noise contour associated with airport operations is modeled to lie approximately one mile west of the project site, so airport noise levels at the project site will be significantly lower, and perhaps not detectable above existing ambient noise levels particularly during on-site activities. No Impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING -- Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion of Impacts:

The proposed project is General Plan designated and zoned for recreational uses and open space. The location, distribution, density or growth rate of the population and housing will not be affected or altered by the proposed project activities. No impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

Background:

The project site is predominately surrounded by residential uses. Access to public services such as fire and police service is available from several access points including off New York Ranch Road and Placer Drive. These access points will remain open during implementation of the RAP and development of the active and passive park activities.

Discussion of Impacts:

The proposed project activities will comply with all applicable provisions of the City's Fire and Building Codes. Implementation of the RAP and development of the park will decrease the burden on the Police Department because there will be more public activity on the site which may deter some of the criminal trespassing activity that has occurred in the past. The proposed project would not alter or affect schools located in the vicinity of the site. Implementation of the RAP ultimately includes active and passive park improvements that will provide much needed recreational opportunities for the City of Jackson and Amador County's citizens. No impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION --				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion of Impacts:

Implementation of the RAP allows for subsequent development of active and passive park improvements that will provide much needed recreational opportunities for the City of Jackson's residents and visitors. Thus, impacts to recreational facilities are considered beneficial. No Impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION -- Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☒	☐	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g. sharp cures or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Background:

According to the September 2021 City of Jackson Existing Conditions Report for the General Plan Update, the City of Jackson represents 12 percent of the total population in the County, three percent of the lane miles, and 1.6 percent of the vehicle miles traveled (VMT). The low proportions of lane miles and VMT are the result of the City representing less than one percent of the total size of Amador County.

The completed recreational facility will follow implementation of the RAP and incorporate approximately 7 acres of developed parkland, and several acres of undeveloped parkland (i.e. walking trails); most of the site will remain undeveloped and inaccessible to the public. City of Jackson general plan land use and zoning for the RAP area is Recreation with a Planned Development/Open Space overlay which is consistent with the proposed recreation uses. The main point of entry to the park facilities will be from New York Ranch Road. New York Ranch Road is a major local collector road that begins at Court Street in the City of Jackson and extends northerly out of the City limits where it connects with Ridge Road.

Currently the only regional park in Amador County is Howard Park located in the City of Ione approximately 11 miles west of downtown Jackson.

Discussion of Impacts:

a) Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

While the project is consistent with adopted policies, plans, or programs supporting alternative transportation, including the Amador County Regional Transportation Plan and the Amador County Transportation Commission Bicycle and Pedestrian Plan, the design should include additional trails to maximize pedestrian and bicycle access to the site. The proposed active and passive recreational uses are within walking distance of downtown Jackson services and several residential subdivisions, consistent with General Plan goals for low VMT infill development but would benefit from pedestrian and/or bicycle access from Tyack Lane, Placer Drive, and possibly Rollingwood Estates. Less than significant with mitigation.

***Mitigation Measure 17.1:** Park trail design shall be augmented with a minimum of two additional pedestrian and/or bicycles access points of entry.*

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)?

In the absence of models to estimate the vehicle miles traveled for the proposed project CEQA Guidelines Section 15064.3(b)3 allows for a jurisdiction to analyze a project's vehicle miles traveled qualitatively. This analysis evaluates factors such as the availability of transit and proximity to other destinations. The proposed project's proximity (approximately 0.3 miles) to an established Amador Transit stop (at the County Library) and the close proximity of neighboring commercial and residential developments reduces the anticipated vehicle miles attributed to this project to a level of insignificance.

Furthermore, construction of a centrally located countywide regional recreational facility within the City of Jackson will redistribute trips and reduce overall trip length associated with existing vehicle trips to other more distant recreational facilities. Park goers in the Jackson area, as well as the upcountry areas of the County (Pine Grove, Pioneer & Buckhorn), will have the potential

to travel fewer miles to reach park facilities, thereby reducing existing VMT. Less than significant impact.

c) Would the project substantially increase hazards due to a geometric design feature (e.g. sharp cures or dangerous intersections) or incompatible uses (e.g. fam equipment)?

The project's main entrance on New York Ranch Road has been selected to provide for adequate vertical and horizontal site distance, and construction drawings will be carefully reviewed to ensure sufficient site distance is provided. During construction, workers and construction-related equipment deliveries will access the site via New York Ranch Road resulting in turning, slow-moving vehicle interaction with passenger vehicles, a potentially dangerous condition. However, construction plans to be reviewed and approved by the City Engineer will include a traffic control plan which will be carried out during construction to minimize the potential adverse effect of such interactions. Less than significant impact.

d) Would the project result in inadequate emergency access?

The recreational facility design and construction drawings will be reviewed by the City Engineer to ensure all emergency access provisions contained in applicable codes and ordinances are incorporated into the design. Construction drawings reviewed and approved by the City Engineer will include a traffic control plan which will be carried out through construction to minimize the effect construction-related traffic has on emergency services. Less than significant impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOUCES -- Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	☒
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

Discussion of Impacts:

Because of the extensive ground disturbance from past uses associated with the site, it is not anticipated that tribal cultural resources, as defined by Public Resources Code Section 21074 and listed or eligible for listing in the California Register of Historical Resources, in a local register of historical resources as defined in Public resources Code Section 5020.1(k), or is determined to be significant pursuant to Public Resources Code Section 5024.1 subdivision (c), would be impacted as a result of RAP implementation and subsequent construction and operation of the active and passive recreational land uses. The public recreation facility, parking and access roadway and dispersed non-motorized trail system are located within the existing disturbance area of the previous mining related land uses. California Native American tribes traditionally and culturally affiliated with the project area have been notified as required by California AB 52 and will be included in the notices for public review of this Initial Study and future hearings before the City Council to consider approval of the Project's construction. Therefore, the project would result in no impact to any known Tribal Cultural Resources. No impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS -Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☒	☐	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion of Impacts:

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The ultimate use of the site as a passive and active recreational park will require periodic use of the City's Wastewater Treatment Plant (WWTP) capacity. The WWTP is currently operating below capacity, particularly during the dry months when the proposed park will likely receive the heaviest use. City staff have reported that sufficient capacity in the WWTP exists to serve the project. Construction and extension of sewer service lateral(s) from existing trunk collection mains to serve the project is considered routine, and biologically sensitive areas will not require disruption to facilitate such construction. No construction related to offsite WWTP treatment capacity is required. Less than significant impact.

Implementation of the project will require professionally prepared grading and drainage plans which are reviewed and approved by the City Engineer. Drainage plans will be required to demonstrate that project-related drainage improvements will ensure that post-project runoff quantities will not exceed pre-project quantities. Storm drainage improvements may include culverts, detention basins, grass-lined swales, or any number of other peak-reducing measures to control runoff quantities. Such facilities will be constructed on-site, in non-biologically sensitive areas, and will be designed by professional engineers in consultation with the project biologist to ensure significant environmental effect will not occur as a result of construction. Less than significant impact.

The ultimate use of the site as a passive and active recreational park will require extension of electrical power, but no natural gas lines or telecommunication facilities. Electrical infrastructure will be coordinated with PG&E and will follow existing roadway/utility corridors. As such, no offsite construction related to electrical power is required. Less than significant impact.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The proposed project will be served by the City's water system. This system relies on water purchased from the Amador Water Agency (AWA). The AWA has indicated that treatment and storage capacity is severely limited. To ensure capacity the AWA will require the City to obtain a "Wholesale Water Will Serve Commitment" prior to service. With implementation of Mitigation Measure 19.1 the impact is less than significant. Less than significant impact with mitigation.

***Mitigation Measure 19.1:** The City shall obtain a "Wholesale Water Will Serve Commitment" from the Amador Water Agency prior to service.*

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

City public works staff report that the WWTP is currently operating below capacity, particularly during the dry months when the proposed park facilities will likely receive the heaviest use. City staff report that sufficient capacity in the WWTP exists to serve the project in addition to existing commitments. No impact.

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Solid waste collection service is provided to the City by ACES, a contract hauler who delivers collected waste to local transfer stations. Waste from transfer stations is segregated and non-recyclable refuse is disposed at Keifer Landfill in Sacramento County. The hauler reports that waste generated by the project will be minimal and that collection and disposal capacity exists to serve the project. No impact.

e) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Solid waste will be collected and handled by ACES. ACES operates under contract to the City as a contract hauler. By contract, ACES must demonstrate that its operations are in continuous compliance with federal, state and local statutes and regulations. In addition, ACES's operations are routinely audited by a third-party service specializing in solid waste operations and its operations are routinely found to be compliant. <u>No impact.</u>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>XX. WILDFIRE</u> – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment)?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes?	☐	☐	☐	☒

Background:

The entire county is prone to fire, either man-made or natural. Location, accessibility, local climatic conditions, topography and vegetation type are among the factors associated with the intensity of a fire. Among the factors which can induce fire hazard potential to human safety and the environment is the degree to which fire hazard reduction measures are practiced in an area and, should a fire occur, the response time and effectiveness of the fire suppression activities.

The project area is located outside of the state responsibility area but is just west of a High Fire Hazard Severity Zone as mapped by CAL FIRE (map dated 9/29/2023).

Discussion of Impacts:

The project site is not located in a state responsibility area classified as a very high fire hazard severity zone. Applicable construction standards will be used during construction of the active recreational facility.

The active public recreation area is served by a paved, publicly maintained roadway (New York Ranch Road) with adequate provision for emergency access equipment. The project's new access roadway and associated recreation facility (parking, fields, courts) would not substantially impair an adopted emergency response plan or emergency evacuation plan.

Additionally, the active recreation facilities area topography is relatively level and it is anticipated that maintenance of this area's surrounding vegetation would be required to ensure maximum efficiency of the facility. Given the public recreation facilities location immediately east of existing development footprint of downtown Jackson, it is not anticipated that wildfire risks would be exacerbated causing the project occupants to be exposed to pollutant concentrations from a wildfire.

As stated above, the active recreation facilities are located on a portion of the site with relatively level topography. No existing drainages are located in the area proposed for active recreation. As a result, people or structures within the active recreation facility area would not be exposed to significant risks, including downslope or downstream flooding, or landslides as a result of runoff, post-fire slope instability, or drainage changes. Areas with greater slope and potential drainage/flooding issues are located within the lakebed area where public access is not allowed (fenced and posted to restrict public access)

Therefore, the project would result in no impact to Wildfire related issues. <u>No impact.</u>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion of Impacts:

Approval of the RAP will not by itself have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Approval of the RAP will not by itself have impacts that are individually limited, but cumulative considerable as all cumulative environmental impacts that could result from implementation of the 2023 City of Jackson Land Use Element have been addressed in the certified EIR. The RAP does not increase the residential growth potential of Jackson. Approval of RAP request will not require mitigation to minimize impacts.

The analysis from this Initial Study for the proposed active and passive recreational land uses found the project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species or threaten to eliminate a plant or animal.

The proposed recreational project was analyzed for cumulatively considerable impacts. This Initial Study found that the project would not have a cumulatively considerable impact when viewed in connection with the effects of past projects, the effects of other current projects, and the effects

of probable future projects. There are no environmental impacts associated with the existing conditions or future conditions after implementation of the RAP that would be exacerbated by the recreational land uses.

The Initial Study found that the project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly following implementation of the measures included in the RAP.