Salt River Ecosystem Restoration Project

Addendum to the Environmental Impact Report

Humboldt County Resource Conservation District

8 February 2023

→ The Power of Commitment

Addendum to the Environmental Impact Report
Salt River Ecosystem Restoration Project

State Clearinghouse Number: SD2007-06-2030

Project Ref#: 12563417

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1. Introduction and Purpose

1.1 Introduction and Project Background

The Final Environmental Impact Report (EIR) for the Salt River Ecosystem Restoration Project (Project or SRERP) near Ferndale, California (State Clearinghouse Number SD2007-06-2030) was certified in February 2011 by the Humboldt County Resource Conservation District (HCRCD). The lead agency is the HCRCD, and the decision-making body is the HCRCD Board of Directors. The purpose of this Addendum is to identify minor Project changes proposed to the Project since certification of the Final EIR.

The Project, as analyzed in the EIR, would result in the creation of a new or expanded Salt River channel and the restoration of tidal wetland habitat at Riverside Ranch. The Project EIR also described ongoing efforts to reduce sediment contributions in the Wildcat Hills and a long-term adaptive management program post-construction. There have been three memorandums to file and two EIR addendums since certification of the 2011 EIR.

– In July 2012, a memo to file was prepared for minor word modifications to Mitigation Measures 3.3.1-7, 3.5.1-1.1, and 3.5.1-1.2.
– In April 2013, a memo to file was prepared that changed the hours of construction to accommodate Saturdays from 7:00 a.m. to 6:00 p.m. and Sundays and Holidays from 9:00 a.m. to 6:00 p.m.
– In July 2013, a memo to file was prepared to slightly modify the mitigation measure (Mitigation Measure 3.3.1-5.1 – Preconstruction removal of dense-flowered cordgrass) for non-native cordgrass (*Spartina densiflora)*.
– In June 2014, an addendum to the 2011 EIR was prepared that described the modification of nesting bird exclusion zones for common species and species of special concern detailed in Mitigation Measure 3.3.1-7 regarding the second phase of work of the Salt River Ecosystem Restoration Project.
– In March 2018, an addendum to the original and amended EIR was prepared that requested design modifications and Project component additions including installing an agricultural bridge, relocating a culvert crossing, and relocating riparian planting areas. The design modifications did not result in substantial changes to the overall Project design or function and did not lessen or avoid the intent of any permit condition.

The purpose of this Addendum is to analyze Project changes that do not meet any of the criteria listed for preparation of a subsequent EIR (Public Resources Code, Section 21166; CEQA Guidelines, Sections 15162, 15164). The proposed Project modifications at the Riverside Ranch property include (1) the construction of public access trails and associated amenities and (2) the lowering of the Riverside Ranch levee in limited, discrete locations, construction of new and realigned drainage ditches in limited, discrete locations, and installation of tide gates to reduce flood impacts to the surrounding agricultural areas (see Section 2).

As demonstrated in Section 3 below, the proposed Project modifications do not meet any of the criteria listed for preparation of a subsequent EIR as identified in section 15162 of the CEQA Guidelines. This means:

– The modifications would not result in any new significant environmental effects or a substantial increase in severity of previously evaluated significant effects that result from either a substantial change to the Project or changes to the Project circumstances;
– There is no new information of substantial importance since certification of the 2011 EIR that shows the modifications would have new significant effects or more severe than previously evaluated effects; and
– No mitigation measures or alternatives, which were found to be infeasible in the 2011 EIR and are capable of substantially reducing a significant environmental effect, would now be feasible.

Therefore, pursuant to section 15164 of the CEQA Guidelines, the differences between the approved Project described in the 2011 EIR and modifications currently proposed are considered minor changes. For these reasons, an addendum to the 2011 EIR is the appropriate CEQA compliance documentation to address modifications to the Project.

This Addendum should be read together with the full text of the 2011 Certified Salt River Ecosystem Restoration Project (SRERP) EIR. Even though modifications to the approved Project are minor, the modifications have been subjected to a detailed analytical process consistent with the methodology and thresholds of significance applied in the 2011 Certified EIR.

1.2 Preparation of an Addendum to the EIR

Under the California Environmental Quality Act (Public Resources Code Section 21000 et. seq., "CEQA") and its implementing Guidelines at California Code of Regulations Title 14, Chapter 3, Section 15164, the preparation of an addendum to an EIR is appropriate when some changes or additions to the EIR are necessary but none of the circumstances enumerated in California Code Regulations Title 14, Chapter 3, Sections 15162 and 15163 exist. Section 15164 states in relevant part:

(a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

Section 15162(a) requires preparation of a subsequent EIR under the following circumstances:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15164 of the CEQA Guidelines states that a lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described above in section 15162(a), calling for preparation of a subsequent EIR, have occurred.

CEQA allows lead and subsequent responsible agencies issuing additional discretionary approvals for a project to restrict their review of modifications to a previously approved project to the incremental effects associated with the proposed project modifications, compared against the anticipated effects of the previously approved project at build-out. In other words, if the project under review constitutes a modification of a previously approved project which was subject to prior final environmental review, the "baseline" for purposes of CEQA is adjusted such that the originally approved project is assumed to exist.

The HCRCD is proposing minor modifications to the approved Project; these changes are described in Section 2 of this Addendum. Some of the resource categories described in Section 2 warrant a more robust discussion about construction or operation impacts or a more robust discussion about a certain project component; therefore, those subheadings are provided to improve the organization of this document. As demonstrated in detail below, the Project modifications do not meet any of the criteria listed in CEQA Guidelines Section 15162 (preparation of a subsequent EIR). First, the modifications would not result in any new significant environmental effects or a substantial increase in severity of previously evaluated significant effects that result from either a substantial change to the Project or changes to the Project circumstances. Second, there is no new information of substantial importance since certification of the 2011 EIR that shows the modifications will have new significant effects or more severe previously evaluated effects. Therefore, pursuant to Section 15164 of the CEQA Guidelines, the differences between the approved Project described in the 2011 EIR and the added and modified elements of the Project as they are currently proposed are considered minor changes. Furthermore, the 2011 EIR and associated mitigation monitoring and reporting program remain valid for mitigating the identified significant impacts that would result from implementation of the Project, including the proposed Project modifications. Thus, an addendum to the 2011 EIR is appropriate to address modifications to the Project.

2. Description of Proposed Project Modifications

2.1 Summary

The Project is a highly collaborative public-private partnership funded through a combination of federal and state grant funding. The HCRCD is the lead agency for the SRERP, which is a large restoration project consisting of excavating and restoring seven miles of the Salt River channel and enhancing over 300 acres of a tidal estuary located in the lower Eel River Delta (Figure 1). The Project has been designed and implemented in phases from downstream to upstream. Construction of 2.5 miles of channel and the tidal estuary component of the SRERP, known as Riverside Ranch, was completed in 2013. Riverside Ranch is owned by the California Department of Fish and Wildlife (CDFW) and is operated as the Salt River Unit of the Eel River Wildlife Area. Additional Project phases were completed in 2014, 2015, 2017, 2018, 2019, and completion of the final upstream most reach of Salt River is subject to landowner approvals. Post-construction monitoring of the completed portions of the Project has been conducted in accordance with the Habitat Mitigation & Monitoring Plan (HMMP) and permit conditions.

This Addendum evaluates design modifications and Project component additions to the Phase 1 Riverside Ranch portion of SRERP. The Addendum includes a description and graphic of the proposed design modifications/additions, along with information demonstrating how the minor changes remain consistent with the overall Project goals/objectives, the Final Environmental Impact Report (FEIR), the HMMP, and Project permits.

The HCRCD is proposing to modify the original EIR and addendums to the EIR by adding public access design features within the Riverside Ranch footprint and modifications to portions of the Riverside Ranch levee to further reduce ~~risk~~ **the occurrence** of flood-related impacts associated with high fluvial flows in the mainstem Eel River to ~~improve~~ **reduce the detrimental effects to** agricultural productivity on agricultural land, reduce flood depth, and erosion within and adjacent to the Riverside Ranch property. These design modifications are consistent with the Project design and function proposed in 2011 and would not result in substantial changes to the overall Project design or function. **Project modifications would improve drainage for adjacent landowners.** Additionally, the proposed Project modifications do not lessen or avoid any permit condition.

Potential post-construction management actions and impact avoidance measures were outlined in Table B-1 of the Salt River Restoration Project Adaptive Management Plan (AMP) as part of the Project Habitat Mitigation & Monitoring Plan (HMMP) (HTH 2012). Many of the post-construction actions identified are consistent with this Addendum in terms of impacts and intent. These existing actions included the following activities:

- Additional Riverside Ranch breaches and/or levee lowering
- Replaced or enlarged culverts and tide gates as needed
- Excavation of tidal channels and/or re-fill or plugged drainage ditches to improve hydrologic connectivity
- Maintain or repair (as-built) access ramps, access roads and road atop Riverside Ranch berm
- Provide additional revegetation with native plants
- Apply/place excavated sediment on agricultural lands
- Install exclusion fence

2.2 Project Modifications

The following components, which meet the overall Project goals and design objectives consistent with the FEIR, Project permits, HMMP and funding commitments, are proposed to be added or modified to the previously permitted and approved Project.

2.2.1 Public Access

At the time of the 2011 EIR development, CDFW was planning to develop public access at Riverside Ranch however specific plans at that time were undefined. This Addendum describes the public access components proposed for the Project Area to provide opportunities for passive, non-extractive, pedestrian-related activities and recreation (i.e., hiking, walking, bird watching) and non-motorized boat usage. The major public access components include a trail with rest areas, non-motorized boat launch area, and a parking area (Figure 2). Public access components are further described below and have been located in mapped upland areas to avoid impacts to wetlands and other sensitive habitats.

Trails and Rest Areas

CDFW would provide public access to the Riverside Ranch property ~~would provide public access~~ in the form of a pedestrian trail located atop the existing Riverside Ranch Levee (setback-berm) that skirts the restored tidal marsh area constructed in 2013 as a part of the SRERP. The trail would be established on the existing setback-berm which is approximately two miles long and 12 feet wide. The trail would extend the entire length of the existing setback-berm. An existing fence along the eastern side of the setback-berm would be maintained in place to ~~manage cattle~~ **protect agricultural resources** on adjacent properties. The out-and-back trail would include three overlook areas off the trail with benches, interpretive signage, and/or picnic tables. Wayfinding signage would be located towards the beginning (southern end) of the trail.

Boat Access

Kayakers are currently accessing the property via informal launching areas along Salt River and Camp Weott Road. A new non-motorized boating put-in and take-out access point for non-motorized boating would be constructed to provide boating access to the property for the public. The boat launch would provide access to and from Salt River from the parking area. Wayfinding and interpretive signage would be located at the boat launch. The boat launch trail would be an eight-foot wide, gravel pathway with an 8% longitudinal slope on the riverbank to approximately seven to eight feet in elevation (NAVD88). Use of the boating access area from the Riverside Ranch property would be limited to open public access periods.

Public Vehicular Access and Parking

Riverside Ranch is accessible via Riverside Road, which is under the jurisdiction of Humboldt County. Between the recorded roadway easement to Humboldt County and ownership by CDFW, there is continuous public access from Dillon Road to CDFW's Riverside Ranch property. Access to the property would be provided during the day via an existing improved 12-foot-wide gravel access road via Riverside Road. A property access gate at the property entrance would be installed to prevent unauthorized access to the property. A new fence would be constructed from the gate to the parking area along the improved access road. The improved access road would include two turnaround areas for public and emergency vehicle use: one at the property entrance before the property access gate and another at the parking area before the trail access gate. A new fence would be constructed between the public access trail and existing dairy barn to prevent public access to the barn.

The new gravel parking area would contain 14 vehicle parking spaces with concrete wheel stops, one ADA space, and a loading/unloading zone that would accommodate bus parking. Additional visitor serving amenities in the parking area would include wildlife safe receptacles, picnic tables, and multiple bike racks. No restroom would be available onsite. Signage would be installed at the entrance and parking area to delineate public access areas, regulate appropriate uses, provide wayfinding, and present educational and interpretive information. Four gates would be installed. One to provide access for grazing operations prior to entering the parking area, one to provide access to the parking area and two gates adjacent to the parking area (to the trail and boat launch) to manage public access.

Operation and Maintenance

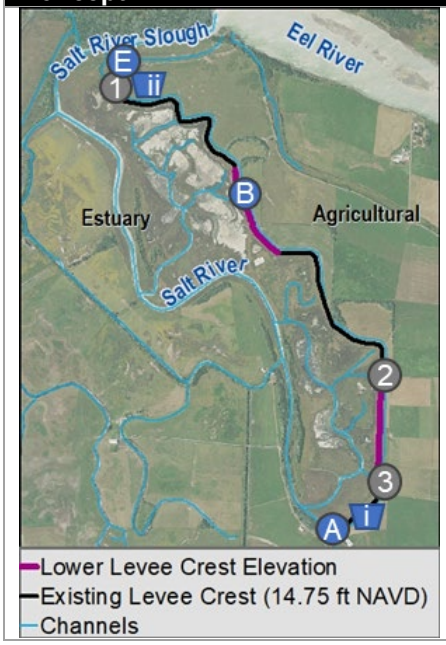
CDFW and their cooperating partners are responsible for the operation and maintenance of Riverside Ranch. Upon the completion of Project construction, all public access areas and amenities would be available to the general public ~~during daytime hours on a minimum of 36 weekends each year~~, **during specific periods determined by CDFW and the California Coastal Commission, in coordination with adjacent landowners for up to 39 weekends annually**. In the future, public use ~~would~~ **could** be expanded upon additional coordination with neighboring agricultural landowners, who's operations overlap the access area from the County road to the public access area. Overnight use would be excluded.

2.2.2 Riverside Ranch Levee Modifications

Phase 1 of the SRERP was constructed in 2013. Phase 1, or Riverside Ranch, included tidal estuary restoration and the construction of a two-mile setback-berm (Riverside Ranch levee) and associated drainage ditches along the eastern perimeter of the estuary.

In 2017, the HCRCD engaged the U.S. Fish and Wildlife Service (USFWS) and Kamman Hydrology & Engineering, Inc. to develop a surface water monitoring program on Riverside Ranch. The results of this monitoring from 2017 through 2019 show that during high magnitude (NOAA's California-Nevada River Forecast Center Extreme Flood Level) and extended flood events on the Eel River, water levels on the agricultural lands east of the Riverside Ranch levee were higher than on the estuary side of the levee. This difference in water levels suggests that Eel River floodplain flows are impounded on the agricultural lands by the Riverside Ranch levee and restricted to outflow to the estuary. During lower magnitude flooding (NOAA's California-Nevada River Forecast Center Action Level and Flood Level) drainage conveyance from the agricultural lands to the estuary is limited by the elevation of stormwater infrastructure and the estuary marsh plain channels. In 2021, the HCRCD retained Professional Hydraulic Engineering services from GHD and Michael Love & Associates (MLA) to work directly with USFWS on a Hydraulic Assessment, which included hydraulic modeling, the development of seven alternative design concepts, and the selection of a preferred alternative (GHD 2021). The alternative chosen included lowering the levee from 14.75 feet to 11 feet in two discrete locations, adding two new gated culverts (tide gates) at lower elevations, and constructing approximately 2,300 feet of new and reprofiled drainage ditches (Figure 2, Table 2.2-1).

Table 2.1-1. Concept Design

Concept	Description
	***Levee Lowering*** Location — Crest Elev. (feet NAVD88[1]) — Length (feet) South — 11.0 — 2,550 North — 11.0 — 1,800 ***Existing Gated Culverts*** Location — Flow Line Elev. (feet NAVD88[1]) — Size 1 — 2.2 — 60-inch dia. 2 — 3.7 — 60-inch dia. 3 — 2.8 — 60-inch dia. ***New Gated Culverts*** Location — Flow Line Elev. (feet NAVD88[1]) — Size A — 1.6 — 60-inch dia. E — 1.0 — 60-inch dia. ***New and Reprofiled Drainage Ditches*** Location — Flow Line Elev. (feet NAVD88[1]) — Length (feet) i (new) — Min 1.6 — 1,500 Ii (reprofiled) — Min 1.0 — 800

The following benefits are expected from the construction of these improvements:

- Minimize the difference between agricultural and estuary water levels during the peak of the Extreme Flood Level event by allowing flood flow on the agricultural fields to overtop the Riverside Ranch levee and flow to the estuary.
- Reduction in peak water levels on the agricultural fields during the Extreme Flood Level event while preventing the estuary from overtopping the Riverside Ranch levee during the Action and Flood Level events.
- Reduce floodplain flow velocities and re-direct floodplain flow away from the residence adjacent to Morgan Slough during the Extreme Flood Level event.
- Reduction in duration of flooding during the Extreme Flood Level event by 35 hours in the northern agricultural fields and by 11 hours in the southern agricultural fields.
- Reduction in minimum water levels between precipitation events in northern and southern agricultural fields.

Riverside Ranch Levee

Two discrete portions of the Riverside Ranch levee, totaling approximately 4,350 linear feet, would be lowered from 14.75 feet[1] to 11.0 feet (see Figures 2-2, 2-3, 2-4 and 2-5). The total volume of earthwork associated with lowering the levee sections is approximately 16,000 cubic yards. Design components include transition geometry from lowered levee sections to existing levee crest, geometry of lowered levee crest sections, and extent and type of erosion control measures for overtopping events. The final design would incorporate beneficial reuse of excavated material for placement on pre-approved areas on the existing salt marsh plain and high marsh ecotone at Riverside Ranch and to support eradication of invasive Spartina. The excavated material would be placed in thin lifts above MHHW (6.5 feet) while not exceeding

[1] All elevations in this Addendum are reported in North America Vertical Datum of 1988 (NAVD88).

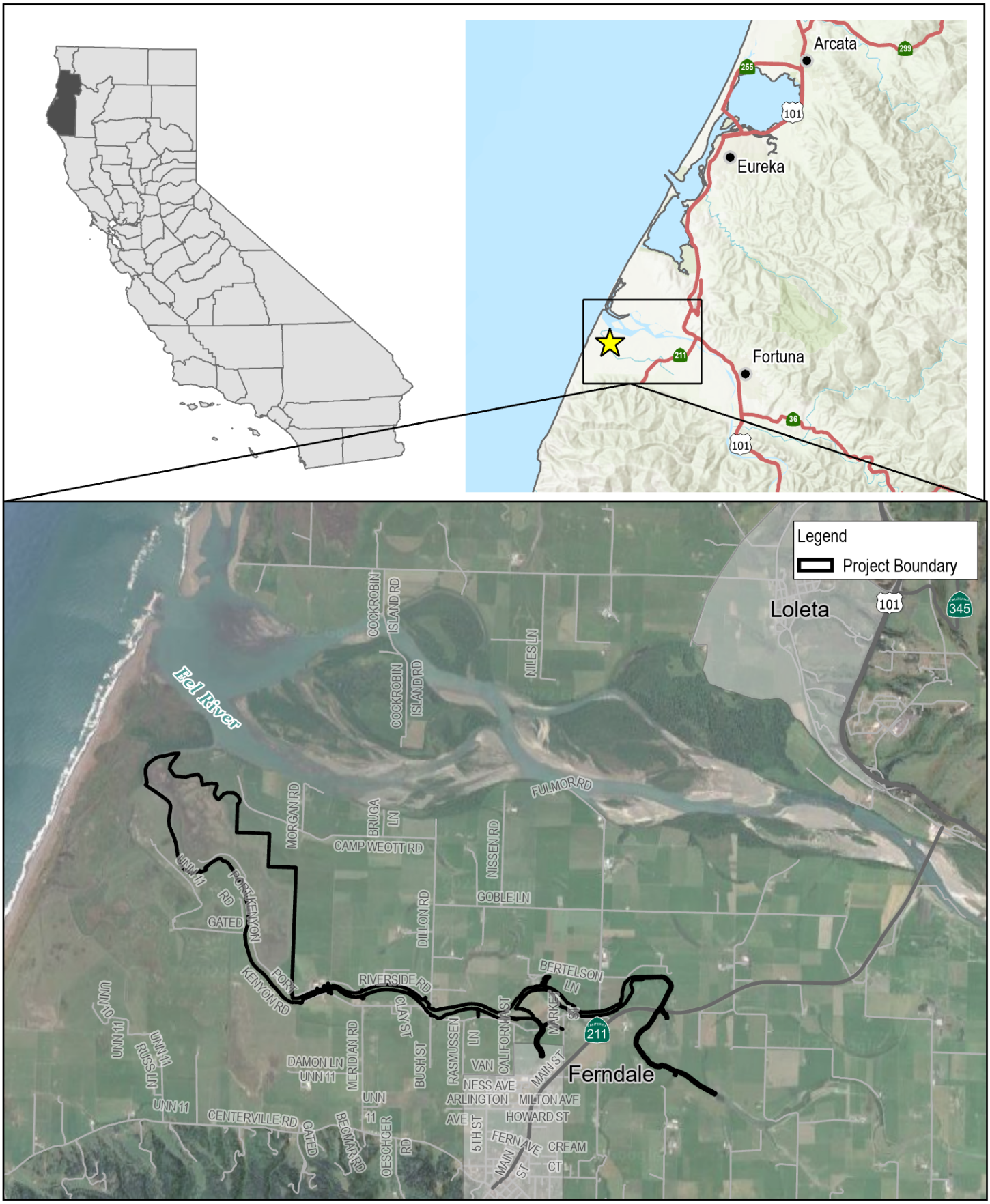
elevation 9.0 feet such that marsh elevation is maintained, and estuarine wetland characteristics persist post-fill placement. Other sediment reuse options for excess sediment include hauling offsite and incorporation into upland features that do not impact agricultural productivity.

Culverts

Two new gated culverts would be installed similar to existing culverts without headwalls, but at lower elevation. One culvert would be installed at the northernmost portion of the Riverside Ranch levee and another at the southernmost end (see Figures 2-1 and 2-6). Culverts would extend to the toe of the levee/bank and backfilled to match existing slopes/grades. Construction of the culverts would require cofferdams to be temporarily installed on the estuary side, within a portion of Salt River and estuary slough channel. The cofferdams would include steel sheet piles extending approximately 10 feet into the channel to allow space for placement of the new culvert and reconstruction of the bank or a similar design. Steel sheet piles would be installed by pushing and/or vibrating, depending on soil conditions. Upon completion of construction, all temporarily disturbed wetlands would be restored to preexisting conditions and hydroseeded with an approved native seed mixture. The construction of water control structures, including culverts and drainage channels, was described in the 2011 EIR, and are located within the Project limits previously described in the 2011 EIR. This action remains consistent with previous evaluations of temporary impacts.

Drainage Ditches

To improve on and off-site drainage, the existing northern and southern drainage ditches along the toe of the Riverside Ranch levee would be reprofiled or new ditches would be created (see Figures 2-1, 2-2 and 2-6). An 800 linear foot portion of the existing northern drainage ditch would be reprofiled to convey water more effectively to the new culvert. A new 1,500 linear foot drainage ditch would be installed along the southern portion of the Riverside Ranch levee to direct water to Salt River. Design components include the geometry of new drainage ditches. The construction of these two features would result in approximately 6,000 cubic yards of excavated material. The final design would incorporate beneficial reuse of excavated material. The excavated material would be placed in thin lifts above MHHW (6.5 feet) on the estuary side of the berm while not exceeding elevation 9.0 feet such that marsh elevation is maintained, and estuarine wetland characteristics persist post-fill placement. Other sediment reuse options for excess sediment include hauling offsite and incorporation into upland features that do not impact agricultural productivity.



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Vicinity Map

FIGURE 1

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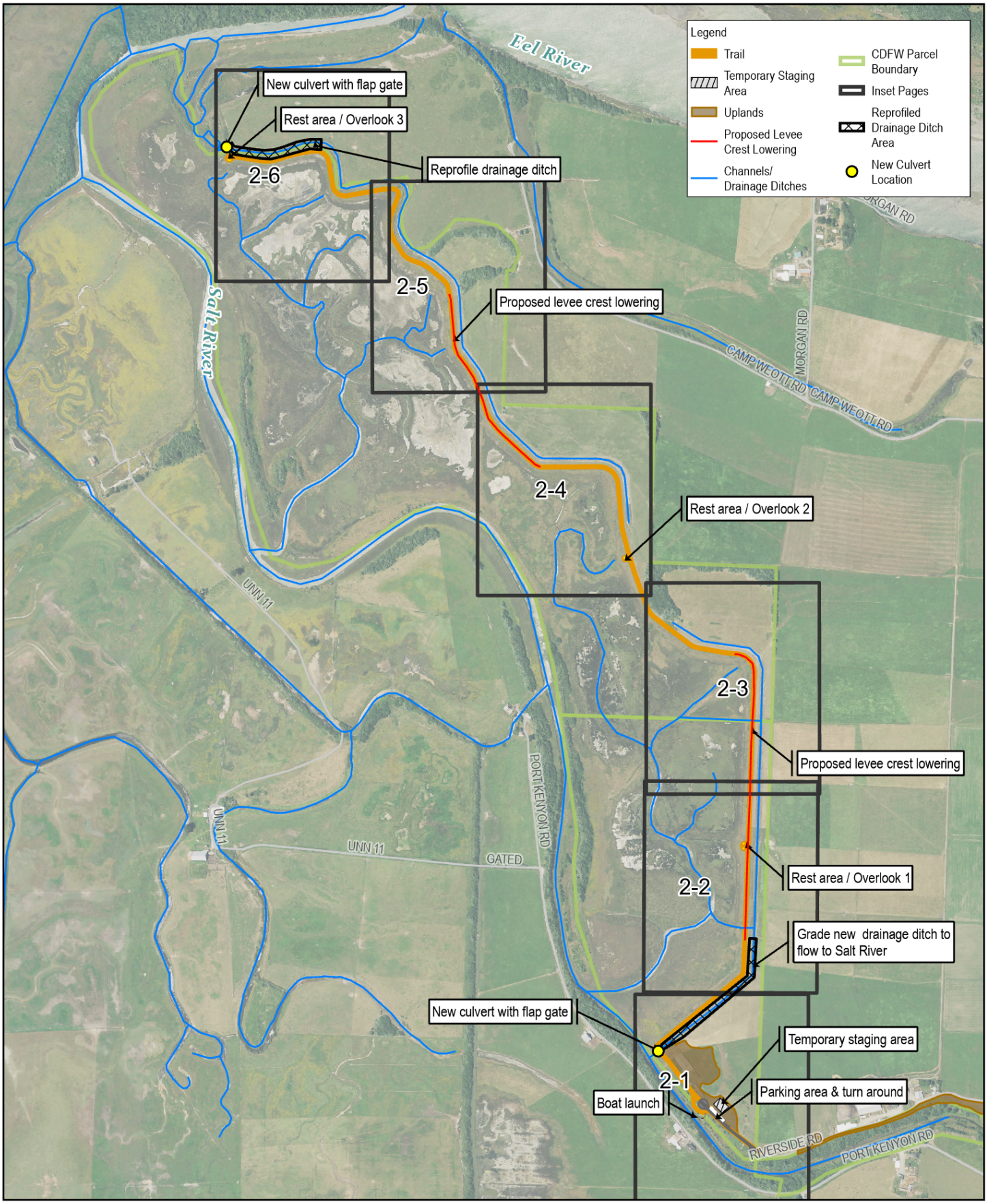

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Project Components Overview

FIGURE 2

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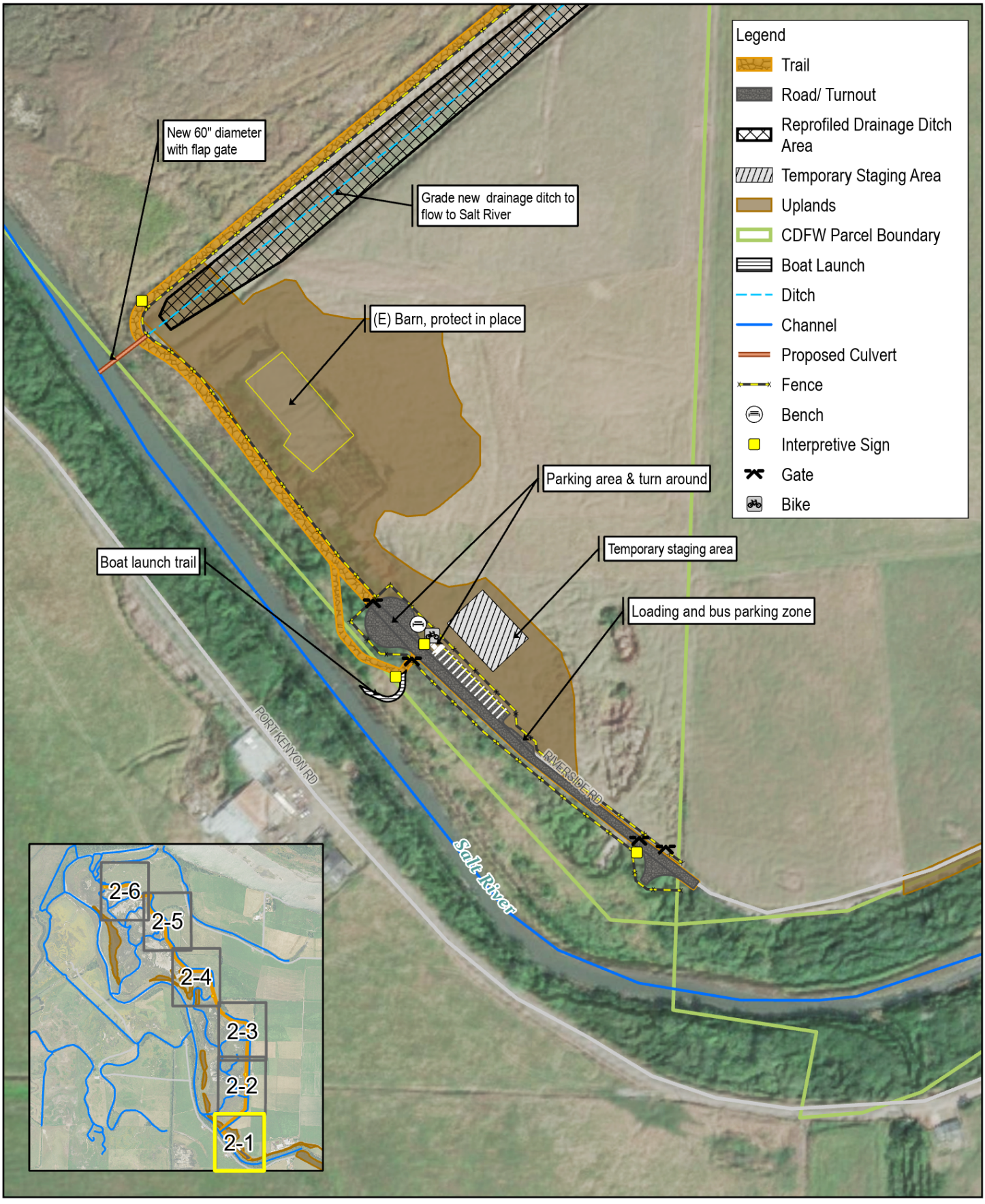

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Project Components Map Series

FIGURE 2-1

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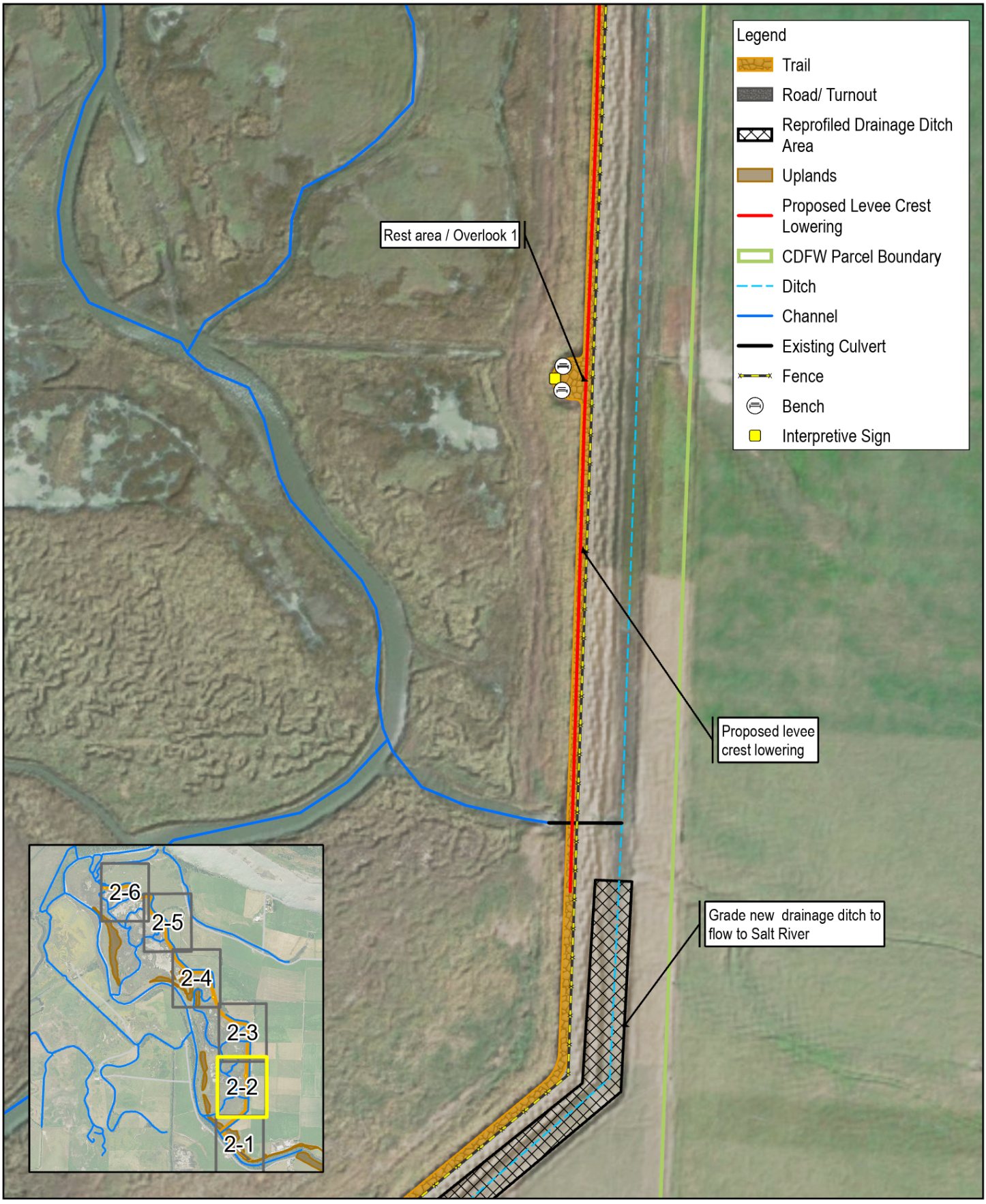

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Project Components Map Series

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FIGURE 2-2

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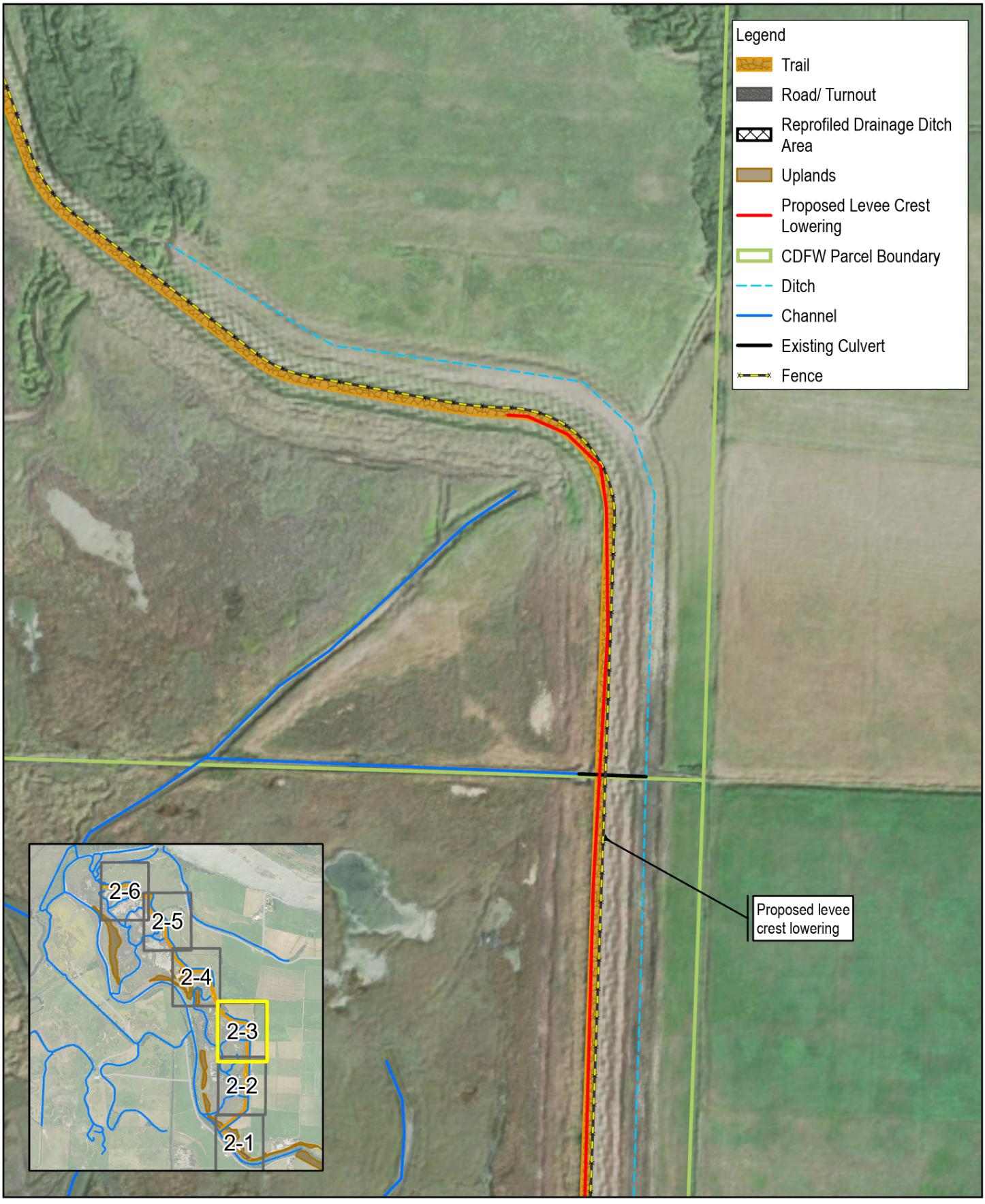

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Project Components Map Series

FIGURE 2-3

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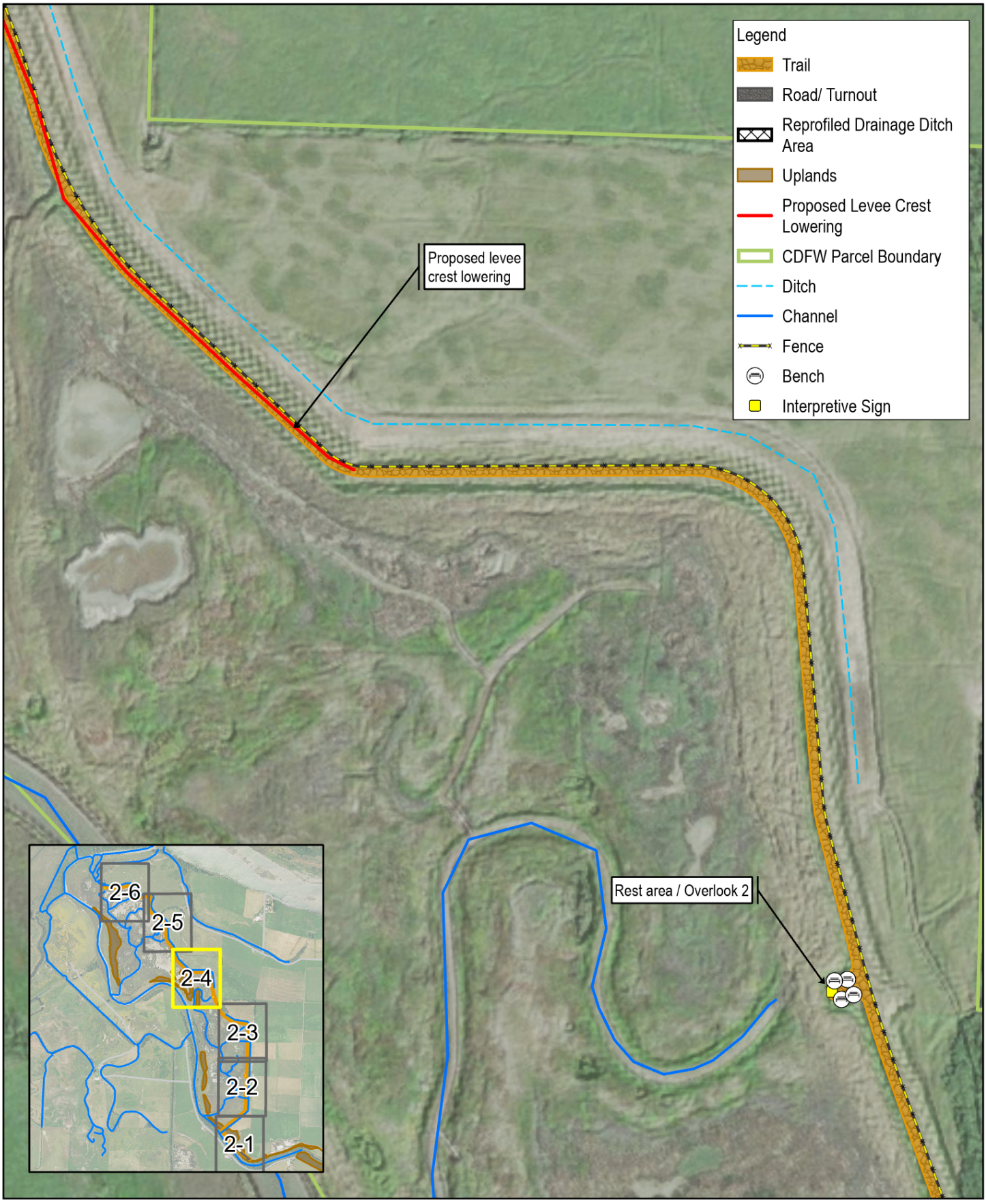

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Project Components Map Series

FIGURE 2-4

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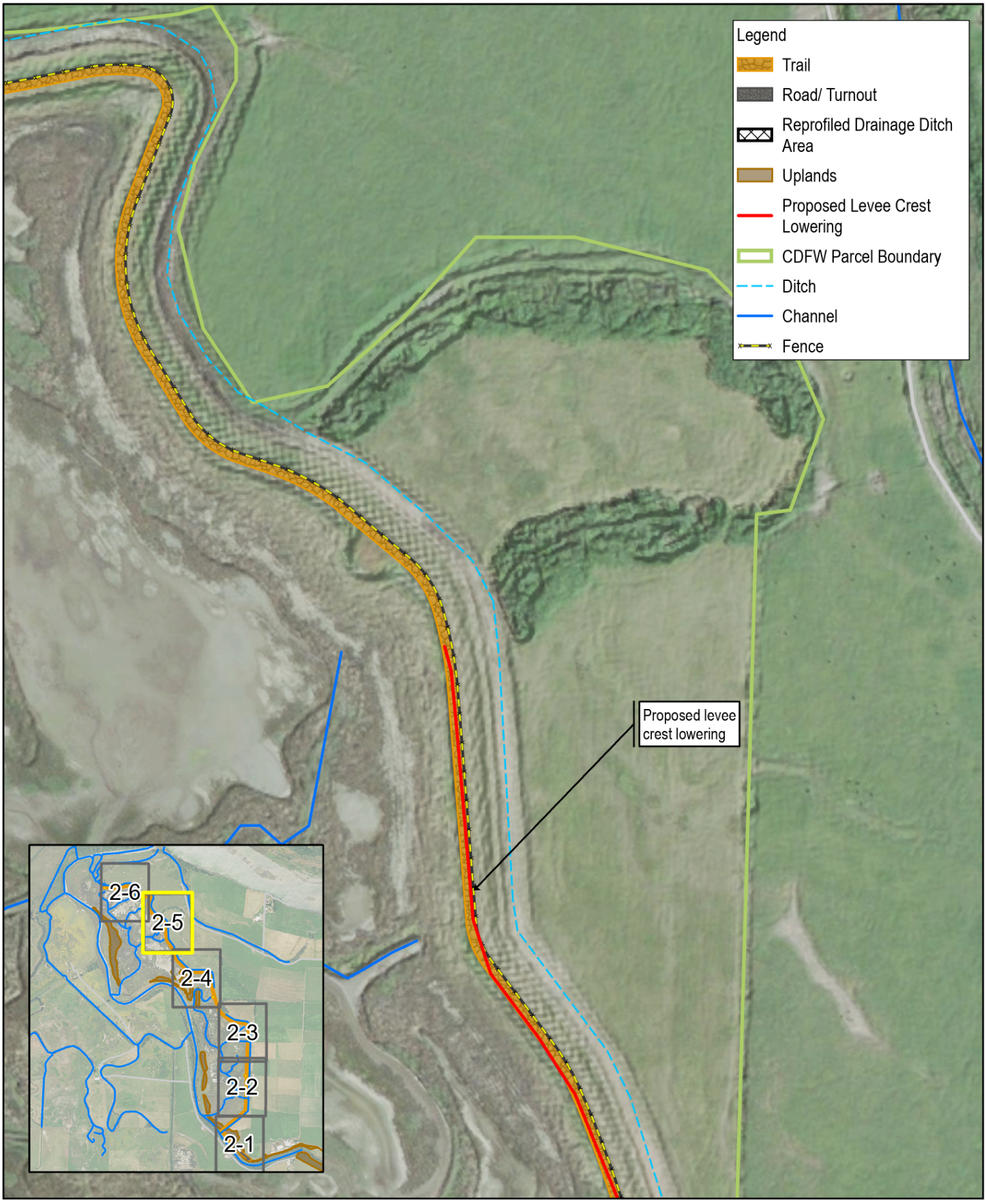

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Project Components Map Series

FIGURE 2-5

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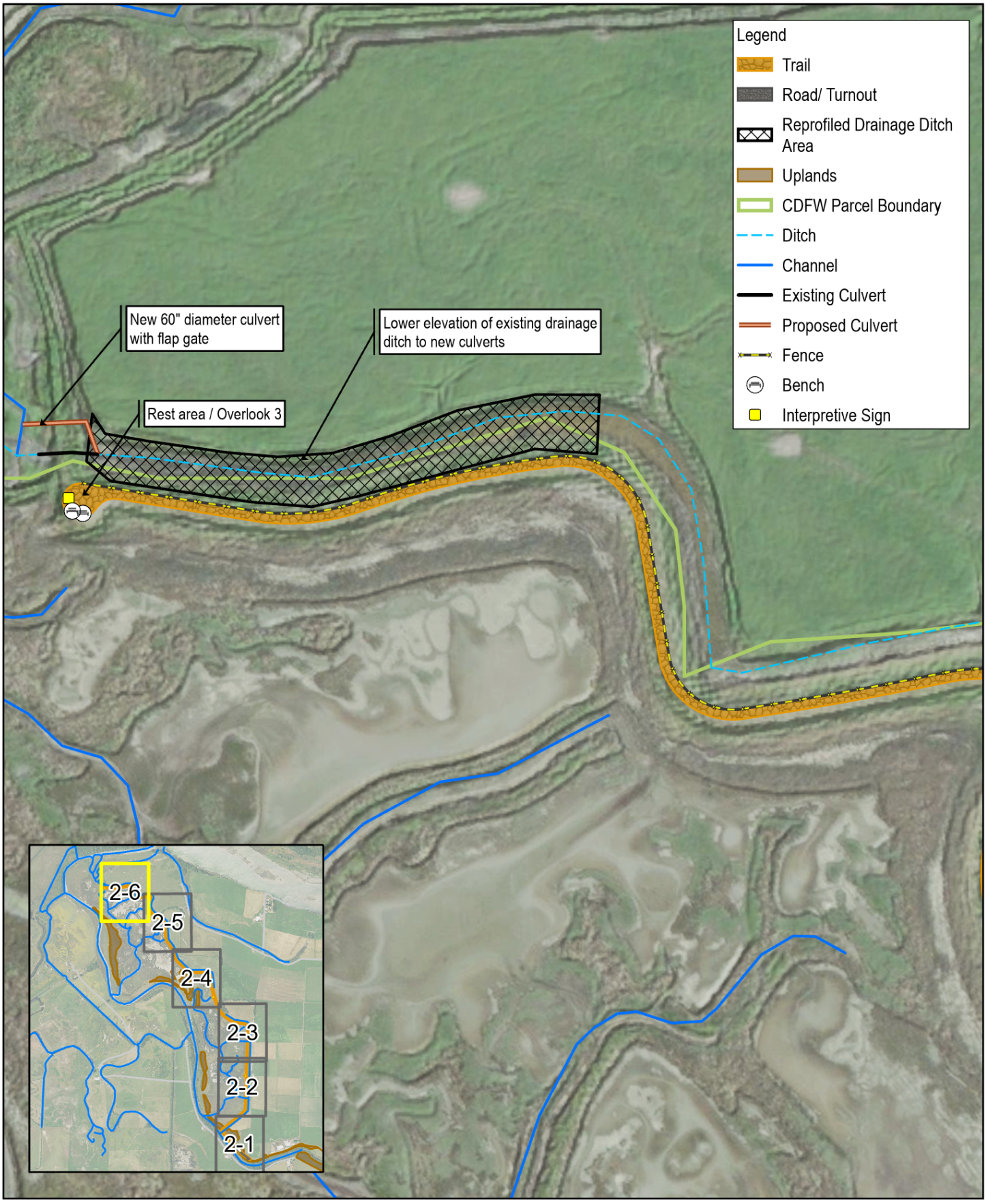

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Humboldt County Resource Conservation District
Salt River Riverside Ranch EIR Addendum

Project No. **12563417**
Revision No. **-**
Date **Oct 2022**

Project Components Map Series

FIGURE 2-6

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3. Environmental Consequences of Proposed Project Modifications

The purpose of the discussion below is to evaluate potential environmental impacts related to changed circumstances, Project changes, or new information of substantial importance resulting from proposed Project modifications that may result in a different environmental impact significance conclusion than those presented the certified 2011 EIR.

3.1 Hydrology and Water Quality

The 2011 EIR identified potentially significant impacts related to potential long-term and short-term impacts on water quality associated with construction, degradation of wetlands and Eel River Estuary water quality, effects of flows in reconstructed channel on channel erosion, and increased wind-wave generated erosion around restored wetlands. These impacts would be reduced to a less than significant impact with implementation of the following Hydrology and Water Quality Mitigation Measures identified in the 2011 EIR:

- Mitigation Measures 3.1.1-1: Implement erosion and water quality monitoring and maintenance plan
- Mitigation Measures 3.1.1-2.1: Prepare and implement Storm Water Pollution Prevention Plan (SWPPP)
- Mitigation Measures 3.1.1-2.2: Implement dewatering restrictions
- Mitigation Measures 3.1.1-2.3: Implement contractor training for protection of water quality
- Mitigation Measures 3.1.1-2.4: Minimize potential pollution caused by inundation
- Mitigation Measures 3.1.1-2.5: In-stream erosion and water quality control measures during channel dredging
- Mitigation Measures 3.1.1-3: Implement water quality monitoring and maintenance plan
- Mitigation Measures 3.1.1-6.1: Implement groundwater monitoring and maintenance plan
- Mitigation Measures 3.1.1-7: Implement erosion monitoring and maintenance plan
- Mitigation Measures 3.1.1-9.1: Armor berms and wetland fringe
- Mitigation Measures 3.1.1-9.2: Implement erosion monitoring and maintenance plan

The 2011 EIR identified a less than significant impact associated with:

- an increase in tidal exchange and salinity in upstream waters that would adversely impact river hydrology and hydraulics;
- dewatering shallow groundwater;
- groundwater quality;
- increased channel scour due to increased tidal prism;
- reconstructed channel effects on off-site flooding;
- drainage of surrounding dairy lands;
- increased frequency of flooding at Riverside Ranch; setback berms could impede or redirect flood flows or fail and threaten adjacent properties and structures;
- effects on water quality and sediment loads from tributary flows to restored channel;

– effects on water quality and sediment loads from reintroduced flows to the Salt River between Williams and Reas Creeks;
– inundation by seiche or tsunami;
– increased scour and erosion at road crossing structures; and
– sea level rise.

Proposed Project modifications would result in the construction of a trail and public access amenities atop an existing levee (setback-berm), a boat launch and boat launch trail leading to Salt River, lowering of the levee to 11 feet in two locations, two new gated (tide gates) culverts through the levee, and new and reprofiled drainage ditches adjacent to the levee. The trail, parking area, and boat launch would be surfaced with gravel, which would not create substantial additional impervious surfaces within the Project Area. The type of grading is consistent with construction techniques described and analyzed in the 2011 EIR. Public access improvements and levee modifications would not interact with groundwater resources. Riverside Ranch is located within FEMA's 100-year flood zone. Proposed Project modifications have been designed to be compatible with hydraulic conditions in the Project Area and allow for overtopping during extreme fluvial events to alleviate the impoundment of flood water and reduce flood risk. Armoring the top of the levee and enhancing drainage would continue to prevent erosion during flood events.

Construction

Proposed Project modifications could result in potential short-term construction-related soil erosion and water quality impairment. Prior to earth-moving activities, Mitigation Measure 3.1.1-2.1 of the 2011 EIR would require the preparation of a stormwater pollution prevention plan (SWPPP), and implementation of measures to avoid construction-related erosion and water quality impairment. Mitigation Measure 4.3-3 of the 2011 EIR requires in-stream erosion and water quality control measures during channel dredging. Mitigation Measures 3.1.1-3 and 3.1.1-7 require the implementation of a water quality monitoring and maintenance plan and erosion monitoring and maintenance plan. Implementation of each of the Hydrology and Water Quality Mitigation Measures would reduce potential construction-related erosion and water quality impairment resulting from proposed Project modifications to a less than significant impact.

Overall, the levee modifications proposed have been developed to further improve drainage of levee ditches and surrounding agricultural lands consistent with the 2011 EIR. No new mitigation measures are required that were not previously analyzed. Therefore, proposed Project modifications would not result in any additional hydrology and water quality impacts that were not previously analyzed. Project impacts are less than significant with the incorporation of Mitigation Measures identified in the 2011 EIR.

3.1.1 Public Access

The trail, amenities, and the parking area generally have a low profile and minimally alter existing landforms and therefore would not alter the course of a stream or river. In-water work would not occur during construction of public access amenities. Ground disturbance for the small footprint of the boat launch would occur at low tide and/or during the dry season. Erosion prevention measures identified in the 2011 EIR Mitigation Measures would be implemented before, during, and following construction to avoid indirect impacts to water quality related to turbidity and fine sedimentation. The proposed public access Project modifications would not result in new hydrology and water quality impacts. The potential impact to hydrology and water quality would remain less than significant with the incorporation of existing mitigation measures.

3.1.2 Levee Modifications

Since the construction of Riverside Ranch was completed in 2013, the site has experienced multiple large Eel River flood events. Generally, the Project has functioned as intended; however, additional levee modifications would further improve drainage and water quality, reduce on-site and off-site flood hazard potential, and maintain restored habitat conditions. The design of the levee modifications is based on a Hydraulic Assessment (GHD et. al. 2021) that evaluated the Riverside Ranch levee and drainage system during multiple rainfall events and Eel River flood levels. The Hydraulic Assessment developed and evaluated several design alternatives consisting of modifications to the levee/ditch system and surrounding area to further reduce flood risk. The selected design alternative provides a minimized extent or footprint of levee modifications while achieving the greatest flood reduction benefit.

Levee Lowering

During the Extreme Flood Level event, under existing conditions, when significant overtopping of the levees along the Eel River inundates the northern and southern agricultural fields, water levels on the agricultural fields rise and exceed water levels in the estuary. Reducing Riverside Ranch levee elevations allows flood water on the agricultural fields to flow over the levee and into the estuary, reducing the magnitude and duration of difference between water levels, and utilizes available storage in the estuary. The proposed levee design modifications would maintain a similar flood frequency due to overtopping of the Eel River levees upstream during the Extreme Flood Level. The design also minimizes the difference between water levels at the time of overtopping reducing the erosion potential. The levee elevation of 11 feet provides protection to the agricultural lands from water levels in the estuary resulting from the Action Level and Flood Level Events.

The water monitoring conducted for the Hydraulic Analysis noted increased velocities under the existing conditions Extreme Flood Level event in the area between the Riverside Ranch levee and the levee along the western side of Morgan Slough, where a residential home is located. Velocities near the residence were reduced by lowering levee crest elevations, as proposed in this Addendum. Therefore, the proposed levee modifications would not result in new or more severe hydrology and water quality impacts. The potential impact to hydrology and water quality would remain less than significant with the incorporation of existing mitigation measures.

The anticipated service life of the proposed Project was established in the 2011 EIR as 50 years. Based on sea level rise projections published in OPC 2018, the likely (66% probability) range of sea-level rise (SLR) at the closest gage site (NOAA Tide Gage Station 9418767) is between 1.2 to 2.4 feet by 2070. The highest astronomical tide at the gage site is 8.5 feet. The proposed levee crest lowering to 11 feet will continue to provide protection to 2070 at the maximum of this likely range of SLR. Other nearby levees along the Eel River exhibit elevations as low as 7.5 feet and typically range from 9 to 11.5 feet. In the event SLR rates are greater than projected, or extreme tidal water levels occur due to storm surges and/or wind-wave events, the lowered levee sections may be overtopped along with other adjacent levees. Overtopping flow would collect in the drainage ditch east of the berm and eventually return into the estuary through the gated culverts through the berm.

Culvert and Drainage Modifications

Two culverts and associated drainage ditches are proposed to be modified to lower peak water levels and floodplain velocities, resulting in improved drainage on and offsite as well as reduced erosion. Lowering of the existing northern drainage channel and installation of a new 60-inch diameter gated culvert discharging into the northern estuary, would reduce the duration of flooding on the northern agricultural fields by 35

hours as well as reduce ponding on the northern agricultural fields by 1.6 feet. Excavation of a new drainage channel that conveys drainage to the south, and 60-inch diameter gated culvert, discharging directly to the Salt River at the levee access road, would reduce the duration of flooding on the southern agricultural fields by 11 hours as well as reduce the peak water levels by 0.5 feet. Therefore, the proposed culvert and drainage modifications would not result in new or more severe hydrology and water quality impacts. The potential impact to hydrology and water quality would remain less than significant with the incorporation of existing mitigation measures

3.2 Geology and Soils

The 2011 EIR identified less than significant impacts for all resource categories under Geology and Soils. No mitigation measures were required.

The proposed Project modifications would not expose structures and people to strong ground shaking, ground failure, or landslides for the same reasons as described in the 2011 EIR. Removal of vegetation and ground disturbance to accommodate the public access amenities, levee modifications, drainage enhancements, and tide gates would be limited to the minimal extent required. Mitigation Measure 3.1.1-2.1 of the EIR requires preparation of a stormwater pollution prevention plan, and implementation of measures to avoid construction-related erosion hazards. Adherence to Hydrology and Water Quality Mitigation Measures 3.1.1-7 (Implement erosion monitoring and maintenance plan) and 3.1.1-9.2 (Implement erosion monitoring and maintenance plan) would ensure that potential soil erosion and loss of topsoil impacts would be less than significant. Additionally, the installation of the new southern culvert would address erosion concerns on the Riverside Ranch levee by reducing the potential for water to overtop the levee and cause to erosion. Project modifications would include impacts to paleontological resources because no deep excavations would occur. Construction would occur on anthropogenic features and areas that were disturbed during previous Project construction in 2013. The proposed Project modifications would not alter the impact conclusions identified in the 2011 EIR for geology and soils and would have a less than significant impact on geology and soils.

3.3 Biological Resources: Terrestrial/Upland/Riparian

The 2011 EIR identified potentially significant impacts related to long, short, and medium-term impacts to wetlands, increase in noxious weed populations, special status plants, breeding or nesting birds, bats, and Northern red-legged frogs. These impacts would be reduced to a less than significant impact with implementation of the following mitigation measures:

– Mitigation Measure 3.3.1-2: Preconstruction surveys and possible installation of nest boxes
– Mitigation Measure 3.3.1-3: Minimizing construction-related disturbance to sensitive habitats
– Mitigation Measure 3.3.1-5.1: Pre-construction removal of dense-flowered cordgrass
– Mitigation Measure 3.3.1-5.2: Monitoring and removal of noxious weeds in restored habitats in the project area
– Mitigation Measure 3.3.1-6: Minimize, avoid, and compensate for impacts to sensitive plants
– Mitigation Measure 3.3.1-7: Minimize and avoid impact to nesting special status or migratory birds
– Mitigation Measure 3.3.1-12: Limit construction access routes and equipment staging areas and minimize excavation in existing aquatic habitat when eggs and tadpoles are expected to be present and conduct preconstruction surveys for Northern California Red-legged Frog (RLF) in all suitable habitat that would be disturbed by construction.

The 2011 EIR identified less than significant impacts associated with impacts to riparian forest and scrub, operations and maintenance disturbance to nesting birds (medium-and long-term) and impacts to special status bats. Impacts to bats associated with construction of the proposed Project modifications would be less than significant because agricultural grassland is regionally abundant, and because special status bats have only a moderate probability of occurrence in the Project Area. Additionally, removal or alteration of bat habitat (trees and structures such as the existing barn) would not occur. This is consistent with the 2011 EIR conclusions.

Construction activities associated with the proposed Project modifications could import noxious weed propagules on construction machinery. However, implementation of Mitigation Measure 3.3.1-5.1 and 3.3.1-5.2 in the Final EIR would reduce the potential increase in noxious weed populations due to the proposed Project modifications to a less than significant level.

Construction of the proposed Project modifications could result in disturbance of breeding or nesting migratory and/or special status birds. However, disturbance of breeding or nesting migratory and/or special-status birds would be avoided or minimized by implementing Mitigation Measure 3.3.1-7 in the 2011 Final EIR.

Construction of the proposed Project modifications could result in short-term impacts to RLFs through mortality related to construction activity or maintenance activity. Short-term impacts to RLFs would be minimized by the implementation of Mitigation Measure 3.3.1-12 in the 2011 Final EIR, which requires pre-construction surveys and related avoid measures to protect the species. Implementation of existing biological resource mitigation measures would result in no new significant impacts to terrestrial, upland, or riparian biological resources from implementation of the proposed Project modifications evaluated in this Addendum. Therefore, the Project's biological impacts would remain less than significant with mitigation.

Wetland Impacts

The levee lowering, public access trail, and trail amenities such as parking area, picnic, and benches are all located in upland areas and would have no temporary or permanent wetland impacts. For the purposes of this analysis, the areas outside mapped upland areas have been assumed to be wetlands.

The installation of two new culverts would occur within the existing footprint of the Riverside Ranch levee. Because the two new culverts are within the existing levee footprint, which is upland, they would not permanently fill any wetlands. Approximately 3.5 acres of wetlands would be temporarily impacted during construction of the culverts, excavation of new drainage channels, and placement of excavated material over Spartina (6.5 – 9.0 feet elevation). Upon completion of construction, all temporarily disturbed wetlands would be restored to preexisting conditions and hydroseeded with an approved native seed mixture. The construction of water control structures, including culverts and drainage channels, was described in the 2011 EIR. This action remains consistent with previous evaluations of temporary impacts and additional mitigation measures are not required.

The public access elements associated with non-motorized boating (boat launch, boat launch trail, and parking access trail) are presumed to be located within jurisdictional wetlands, as boating activities require access to the high-tide line. The boat launch would consist of a permeable gravel ramp which would continue to allow infiltration and regrowth of some vegetation. The boat launch trail would prevent the public from forging their own pathways through adjacent wetland areas and reduce erosion potential from unfocused public access. The boat launch and launch trail would permanently fill up to 0.05 acres of wetlands with gravel up to three inches above the existing ground surface. Permanent wetland impacts associated with the non-motorized boating access are summarized below in Table 3.3-1 and compared to the original Project wetland fill/creation acreages presented in the permitted HMMP (HTH 2012) and 2018

amendment. With the additional fill proposed in this Project modification, the overall Project will maintain a net gain of wetlands and remains self-mitigating. The Addendum proposes no additional wetland impact above and beyond the net creation achieved comprehensively by the Project to date. Therefore, new mitigation for the proposed Project components is not necessary, and the existing mitigation in the 2011 EIR remains applicable and feasible. The impact to wetlands remains less than significant.

Table 3.3-1. Summary of Anticipated Permanent Wetland Fill/Creation for Original Project Plus Proposed Additions (all units in acres)

Description	Potential Wetlands Filled	Wetlands Created	Projected Change
Parking Access Trail	0.03	0	-0.03
Boat Launch Trail	0.02	0	-0.02
Boat Launch	0.001	0	-0.001
Levee Modifications	0.0	0	0.0
Proposed Total	**0.05**	**0**	**-0.05**
2018 Amendment Total[2]	0.01	0	-0.01
Original Project Total	0.3	1.6	1.3
Proposed Total + Original Total	**0.35**	**1.6**	**1.25**

[1]From Table 2 in Project HMMP (HTH 2012).
[2]Relative to the rounding precision (0.1 acres) presented in the HMMP, the changes proposed in the 2018 Amendment were within the calculated rounding error which does not alter the HMMP projected change and therefore mitigation for the proposed Project components was not proposed.

3.4 Biological Resources: Aquatic

The 2011 EIR identified a less than significant impact associated with disturbance of benthic habitats, and the creation of habitat that benefit non-native fish species. The 2011 EIR identified potentially significant impacts to aquatic resources from decreased water quality due to construction/dredging activities and entrainment of fish in areas disconnected from the estuary. These impacts would be reduced to a less than significant impact with implementation of the following Mitigation Measures:

– Mitigation Measures 3.4.1-1.1: Develop a SWPPP
– Mitigation Measures 3.4.1-1.2: Limit initial construction to an extended dry weather season (June 1 – October 1)
– Mitigation Measures 3.4.1-1.3: Adhere to site-specific construction plans
– Mitigation Measures 3.4.1-1.4: Divert concentrated runoff and discharge away from channel banks
– Mitigation Measures 3.4.1-1.5: Minimize removal of and damage to native vegetation
– Mitigation Measures 3.4.1-1.6: Install temporary construction fencing to identify work areas
– Mitigation Measures 3.4.1-1.7: Grade and stabilize spoils sites
– Mitigation Measures 3.4.1-1.8: Avoid operating equipment in flowing water
– Mitigation Measures 3.4.1-1.9: Fish relocation
– Mitigation Measures 3.4.1-1.10: Tidewater Goby Measures
– Mitigation Measures 3.4.1-2: Biological monitoring program and adaptive management

3.4.1 Public Access

Construction and operation of the trail and parking area would occur outside of benthic habitats. The location of the boat launch has a potential to impact aquatic biological resources. However, construction of

the boat launch would occur during the dry season and/or during low tide; therefore, dewatering and fish relocation would not be required. The mitigation measures listed above would reduce potential construction impacts to aquatic biological resources to a less than significant level. No new mitigation measures are required.

3.4.2 Levee Modifications

The construction activities associated with the proposed Project modifications (i.e., culvert installation) have the potential to dewater existing habitat, increase suspended sediments and turbidity, and introduce contaminants (fuel oils, grease) in the Project vicinity. Construction would occur during the dry season and/or during low tide, which would reduce potential impacts to aquatic biological resources. However, cofferdams would need to be constructed within a portion of the Salt River and estuary slough channel to construct the new culverts. Salmonids and individuals of other aquatic species could be killed or injured during these in-channel construction activities as a result. The 2011 Final EIR includes a number of mitigation measures (listed above) to reduce potential impacts to aquatic biological resources to a less than significant level. Implementation of the mitigation measures above would result in no new impacts to aquatic biological resources from implementation of the proposed Project modifications evaluated in this Addendum. No new mitigation measures are required.

3.5 Air Quality

The 2011 EIR identified potentially significant impacts related to conflicting with implementation of applicable air quality plans, violating air quality standards through the release of particulate matter during construction, exposing sensitive receptors to substantial pollutant concentrations, cumulatively considerable net increase of any criteria pollutant, exposing workers or the public to hazardous toxic emissions or substantial pollutant concentrations, generation of greenhouse gas emissions that may have a significant impact on the environment, and conflicting with an applicable plan, policy or regulation. As indicated in the 2011 EIR, these impacts would be reduced to a less than significant impact with implementation of Mitigation Measures 3.5.1-1.1 (Utilize Best Management Practices to minimize fugitive dust generation and assure compliance with North Coast Air Quality Management District rules for particulates) and 3.5.1-1.2 (Minimize construction machinery emissions). The 2011 EIR identified less than significant impacts associated with creating objectionable odors affecting a substantial number of people and generating greenhouse gas emissions that may have a significant impact on the environment.

Proposed Project modifications would not result in new or more severe impacts because the proposed Project modifications would not substantially add to the emissions levels for the proposed Project as analyzed in the 2011 EIR. Construction and installation of the proposed Project modifications could increase construction-related emissions of fugitive dust (PM_{10} and $PM_{2.5}$) and result in exposure of sensitive receptors to fugitive dust emissions during construction-related earth movement activities. However, Mitigation Measure 3.5.1-1.1 of the 2011 EIR would require implementation of applicable air quality BMPs and assure compliance with the North Coast Unified Air Quality Management District (NCUAQMD) rules for particulates. With implementation of Mitigation Measure 3.5.1-1.1, no new or increased substantial construction-related air quality impacts would result from implementation of the proposed Project modifications evaluated in this Addendum.

The proposed addition of up to approximately five construction equipment and worker vehicle trips per day for a five-month period for the public access and levee modifications would have an inconsequential impact on traffic, the primary generator of mobile source emissions. The proposed Project modifications would maintain the 2011 EIR conclusion that the Project would have a less than significant impact on air quality with the incorporation of the Mitigation Measures 3.5.1-1.1 and 3.5.1-1.2.

3.5.1 Public Access

The parking capacity for public access would be 15 personal vehicles (accounting for the one ADA space) and one bus. If parking capacity is met once each day for the proposed 36 weekends that Riverside Ranch would be open to the public, the Project would result in approximately 1,152 vehicles to the Project Area annually. However, to estimate maximum use, if parking capacity is used as a proxy for vehicle trips and it is assumed the parking area is at full capacity twice for 365 days per year, the maximum vehicles the Project would bring to the site is 32 vehicles daily, or 11,680 vehicles annually. At the Project's maximum capacity, 32 vehicles daily is considered a *de miniumus* air quality impact. Increased vehicle use on gravel roads to the Project Area could increase fugitive dust (PM_{10} and $PM_{2.5}$) and result in exposure of sensitive receptors to fugitive dust emissions. However, gravel roads would continue to be maintained by CDFW and Humboldt County Department of Public Works to minimize dust related to vehicular travel. A less than significant impact from construction and operation of Project modifications would occur.

During operation of the Project, some GHG emissions would occur from worker trips and recreational visits. In a scenario with maximum visits daily, recreational visits would bring approximately 32 vehicles daily, or 11,680 vehicles annually to the site. Operation and maintenance of the Project would result in a fraction of the trip generation by land use screening levels from the following land uses: single-family residential, school, hotel, general office building, or general light industry. The Project would not result in substantial long-term operational emissions of GHGs, even when combined with annualized construction emissions. GHG emissions related to operation of the Project remain less than significant.

3.6 Noise

The 2011 EIR identified potentially significant impacts associated with construction noise. As indicated in the 2011 EIR, these impacts would be reduced to a less than significant impact with implementation of Mitigation Measure 3.6-1.1 (Noise from earthmoving and hauling of soils).

Because of the distance of sensitive receptors from the Project Area in this sparsely populated, rural area, the construction of the public access amenities and levee modifications would have an inconsequential increase in construction noise compared to what was analyzed in the 2011 EIR. Construction and operation of proposed Project modifications would not result in the exposure of persons off-site or result in generation of noise levels in excess of applicable standards. Any noise or vibration produced by construction equipment associated with the proposed Project modifications would be minor, of short duration, intermittent, and, consistent with the 2011 EIR conclusions. The proposed Project modifications would not result in new or more severe noise impacts. Potential impacts related to noise would remain less than significant with the incorporation of mitigation.

3.7 Aesthetics

The 2011 EIR identified less than significant impacts for short-term construction impacts on visual quality, long-term effects on scenic vistas and scenic resources, and effects on light and glare. The Project Area includes broad views of agricultural fields adjacent to the Salt River in all directions. Rural farm roads bisect pasturelands and provide access to dairy operations and rural homes. There are views of the Eel River corridor along the Project Area and estuary mudflats at the lower end of the Project Area. In the distance, the vista includes forested hillsides to the north, south and east. The landscape is dotted with livestock, farm complexes, houses, and barns that reflect the area's agricultural heritage. A variety of farm and dairy equipment is visible and agricultural activities can be observed throughout the area.

The gravel roadway and trails would be constructed on existing berms and would have a low profile, therefore would barely be noticeable from the surrounding agricultural properties and lightly traveled rural roadways. The parking area would also have a low profile and would look similar to existing gravel roadways in the vicinity of the Project Area. Fencing and gates would be a similar height and materials as existing agricultural fences. Signage would be a similar height as fencing. No amenities would produce glare or light. The Riverside Ranch levee modifications, including the tide gates, would be similar and comparable to existing water control features within the Project Area. Public access amenities and Riverside Ranch levee modifications would be consistent with other elements on the surrounding agricultural lands.

Temporary visual changes associated with ground disturbance (e.g., bare soils visible in the Project Area) would be short-term in duration. Following construction, bare soils would be reseeded and/or replanted to restore the Project Area to its pre-Project visual condition.

There would not be any new significant impacts or substantial changes to the environmental evaluation of aesthetic resources provided in the approved 2011 EIR that would occur with implementation of the proposed Project modifications. The Project modifications evaluated in this Addendum are visually consistent with the Project as proposed in the 2011 EIR and would not generate any new significant impacts related to aesthetics. Therefore, the proposed Project modifications would have no impact or a less than significant impact on aesthetics.

3.8 Land Use

As discussed in Section 3.8 of the Final EIR, land use and planning impacts would occur if the Project would physically divide an established community (e.g., a freeway dividing a populated residential community), conflict with a land use policy adopted for the purpose of avoiding an environmental impact, conflict with an applicable habitat conservation plan or natural community conservation plan, or result in a substantial alteration of the present or planned use of an area. Regarding land use policies, each Section of the 2011 EIR addresses the potential for conflicts between the Project and relevant plans adopted for the purpose of avoiding environmental impacts.

Land uses in the Salt River channel area are primarily agricultural, along with a few residences and the wastewater treatment plant of the City of Ferndale. In addition to the natural resource habitat restored by the Project, portions of Riverside Ranch remain in agricultural use (seasonal livestock grazing) and includes a complex of ranch buildings. No homes would be affected with the proposed Project modifications. The Project would not divide an established community. There are no habitat conservation plans or natural community conservation plans applicable to the Project site; therefore, there would be no conflict with any such plans. The proposed Project modifications would not alter the approved land use type or intensity. Similar to the Project analyzed in the 2011 EIR, the proposed Project modifications would have no impact or a less than significant impact on land use.

3.9 Agricultural Resources

The 2011 EIR identified less than significant impacts or no impacts for the conversion of prime farmland and other agricultural land, conflict with Williamson Act contracts, and changes which could result in the conversion of farmland to non-agricultural use. Proposed public access would not directly or indirectly impact any agricultural property uses or production. The proposed Project modifications would not convert agricultural or forestry uses and would therefore have no Project-wide impact on these resources and would result in no change to the 2011 EIR conclusion. The proposed Project modifications would have a less than significant impact on agricultural resources, consistent with the 2011 EIR.

3.9.1 Levee Modifications

The proposed Riverside Ranch levee modifications would have a net increased benefit to adjacent agricultural resources. Benefits would be achieved by allowing peak Extreme Flood event flow on the agricultural fields to overtop the Riverside Ranch levee and flow to the estuary. The Project would also reduce peak water levels on the agricultural fields during the Extreme Flood Level event while preventing the estuary from overtopping the Riverside Ranch levee during the Action and Flood Level events. This would reduce the duration of flooding during the Extreme Flood Level event by 35 hours in the northern agricultural fields and by 11 hours in the southern agricultural fields, as well as reduce ponding depth and duration on agricultural fields. Construction of modifications would not negatively impact agricultural property or production; however, reduced inundation of agricultural fields would likely result in increased production of agricultural lands on Riverside Ranch and adjacent properties. The proposed Project modifications would have a less than significant impact on agricultural resources.

3.10 Recreation

The 2011 EIR identified less than significant impacts for conflicts with established recreational and educational uses of the site, interference with public access, degrading the recreational experience, increasing the use of existing facilities, or long-term disruption to an established recreational area, and new recreational facilities that may have an adverse effect on the environment.

As discussed in Section 3.10 of the Final EIR, there are currently no hiking trails that bisect or fall within the Salt River riparian zone. The Project Area is currently undeveloped for recreational use. In tributary watersheds, public access is on County roads that are surrounded by private lands, and Russ Park and Fireman's Park in the Francis Creek watershed. These two parks provide hiking trails and public parking facilities.

This proposed Project Addendum includes the development of recreational amenities within the Project Area. These modifications would not interfere with or disrupt existing recreational activities at nearby recreational areas and would not create an increased use of existing recreational facilities that would cause substantial physical deterioration of the facility. The Project would not include construction of recreational facilities that cause an adverse physical effect on the environment that is new or more severe than evaluated in the 2011 EIR because the public access components are sited and designed to avoid impacts to sensitive habitat to the greatest extent possible (see Section 3.3 and Section 3.4 regarding Biological Resources). Project construction and operation of the public access facilities would not create an adverse effect on the environment due to the project design and incorporation of existing Project mitigation measures. Therefore, the proposed Project modifications would have a less than significant impact on recreational resources.

3.11 Cultural Resources

Prehistoric and historic resources of the project area were assessed in a March 2008 Cultural Resources Evaluation prepared by Roscoe and Associates (R&A) and a January 2011 Addendum Report, which evaluated whether structures on the Salt River Ecosystem Restoration Project Area and Riverside Ranch property (e.g., barns, dike and ditch system) were historic resources. The 2011 EIR did not include mitigation measures to protect historical (built) environmental resources. Project modifications to not include alteration of the Riverside Ranch barn or any other built historic resource. The trail would be located adjacent to the dairy barn (RA-SR-06). However, fencing would be installed between the barn and trail, preventing public access near the barn. The Project's Cultural Resources Evaluation (R&A 2008) included a California Historical Resources Information System (CHRIS) Records Search and results from Native

American consultation. No Tribal cultural resources were found in the area of the Project modifications. Therefore, Project modifications remain consistent with the findings of the 2011 EIR specific to historic resources and continue to be less than significant.

The 2011 EIR identified potentially significant impacts associated with the loss of unknown archaeological and historic resources. These impacts would be reduced to a less than significant impact with implementation of Mitigation Measure 3.11.1-1 (Cease work and conduct assessment - Inadvertent Discovery of Cultural Resources and Inadvertent Discovery of Human Remains).

Construction of the proposed public access amenities and levee modifications would be limited to the study area that was analyzed in the 2011 EIR. No new impacts to cultural resources would result from implementation of the proposed Project modifications, and Mitigation Measure 3.11.1-1 would remain applicable in the event of discovery of unknown archaeological and historic resources, or the inadvertent discovery of human remains. Therefore, with the implementation of Mitigation Measure 3.11.1-1, the Project modifications would have a less than significant impact on cultural resources.

3.12 Transportation

The 2011 EIR identified potentially significant impacts due to Project-related traffic, and an increase in the potential for accidents or safety concerns on public roads. As indicated in the 2011 EIR, these impacts would be reduced to a less than significant impact with implementation of Mitigation Measure 3.12.1.1 (Traffic Control Plan). The 2011 EIR identified less than significant impacts associated with impacts on public transit, bicycle or pedestrian facilities, and parking.

Construction

Construction activities associated with the proposed Project modifications would be minor (involving approximately five trucks and worker commute vehicles per day for five months) and would not substantially increase the construction traffic described and analyzed in the 2011 EIR. Mitigation Measure 3.12.1.1 of the EIR required the preparation of a traffic control plan that identified haul routes public notification, required signage/flagging, potential lane/road closers, detour routes, provisions for providing temporary pedestrian access (if applicable), provisions for maintaining access to all parcels, and that the Traffic Control Plan shall be periodically updated throughout the course of the Project. Therefore, consistent with the Project analyzed in the 2011 EIR, the proposed Project modifications would have a less than significant impact on transportation with the incorporation of Mitigation Measure 3.12.1.1.

Operation

The Project Addendum proposes modifications to Project operations due to increase recreational use of the site. The parking capacity on site would be 15 personal vehicles and one bus. If parking capacity is met once each of the 36 weekends that Riverside Ranch would be open to the public, the Project could bring 1,152 vehicles to the Project Area annually. In the future, public use would be expanded upon additional coordination with neighboring agricultural landowners. If parking capacity is used as a proxy for vehicle trips, and it is assumed the parking area is at full capacity twice daily, the maximum vehicles the Project could bring to the site is 32 vehicles daily, or 11,680 vehicles annually.

The proposed Project modifications would increase the number of vehicles driving on Riverside Ranch Road and other rural roads to travel to Riverside Ranch for guided tours and other recreational opportunities. These rural roads currently serve existing agricultural operations and are utilized by farm equipment. The low-speed limit and deteriorated conditions of these roads require slower vehicle speed and makes collisions between passenger vehicles and farm equipment unlikely. Additionally, no

modifications are proposed to the shape and curve of the roads or to existing intersections. Therefore, the straight lines of sight would remain. Signage about the working landscape to make users aware of potential conflicts on the roadways. The Project modifications would not result in a new significant geometric hazard.

Project Area improvements within the Riverside Ranch property include gravel improvement to a portion of the Riverside Ranch Road as well as two vehicle turnaround locations designed to accommodate fire and emergency vehicles. One vehicle turnaround would be outside the fenced parking area, therefore accessible at any time. The other turnaround would only be accessible during times CDFW staff or cooperating partners have opened the locked access gate to allow access to the parking lot by the public. Proposed Project modifications would improve emergency access within the site and would not impede or prevent emergency access.

Overall, the Project's impact on transportation would be less than significant in regard to operational modifications. Construction impacts related to transportation have the potential to be significant, however with the incorporation of Mitigation Measure 3.12.1.1, the Project modifications would have a less than significant impact on transportation.

Subsequent to the 2011 EIR, Senate Bill (SB) 743 created a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative method for evaluating transportation impacts, which was done in early 2016. OPR required that Vehicle Miles Traveled (VMT) become the primary metric or measure of effectiveness (MOE) for determining the significance of transportation impacts across California (Section 15064.3(a)). According to 2018 OPR Technical Advisory, projects that generate fewer than 110 trips per day can be assumed to cause a less than significant transportation impact. As described in Section 3.5 Air Quality, the increased public access is not anticipated to exceed 32 vehicles (64 trips) daily. Any operational increase due to maintenance or increased use by the public would generate less than 110 trips per day. Therefore, the impact specific to VMT would be less than significant.

3.13 Public Services and Utilities

The 2011 EIR identified less than significant impacts for all public services and utilities, and no impacts to parks. Proposed Project modifications would not block public service vehicles from accessing the site or result in disruption of response times or other public service standards because fire protection/first response and law enforcement staff would still have unimpeded access to the site. First responders would arrive via rural roads leading to Riverside Road. Emergency vehicles could traverse the trail if needed. Site improvements include two vehicle turnaround locations designed to accommodate emergency vehicles. Changes to the proposed Project since the time of prior environmental review would not result in new or more severe impacts to public services.

As discussed in Section 3.13 of the Final EIR, the approved Project would not include any wastewater or water facilities and would not create additional wastewater or water need with the exception of small amounts of water to be trucked to the site for use during construction. The approved Project would generate only a minimal amount of solid waste during construction. The public access facilities include trash and recycling receptacles near the trail and parking area that would be maintained by CDFW and cooperating partners. Solid waste from construction and operations would be sent to an approved landfill in the disposal area and would not exceed the capacity of local landfills. The proposed Project modifications would not affect utilities or service systems. The Project's impact on public services and utilities would be less than significant.

3.14 Hazards and Hazardous Materials

The 2011 EIR identified potentially significant impacts associated with health effects from mosquitoes. As indicated in the 2011 EIR, this impact would be reduced to a less than significant impact with implementation of Mitigation Measure 3.14.1-2.1 (Adapt and apply regional best management practices for managed marshes). The 2011 EIR identified less than significant impacts for effects of soil contamination, and accidental releases of hazardous materials during Project construction.

The proposed Project modifications would include excavation and construction-related activities within the Project Area analyzed in the 2011 EIR. Mitigation Measure 3.14.1-2.1 of the EIR requires the application of BMPs and other water controls for mosquito control. The proposed Project modifications would not result in soil contamination or accidental releases of hazardous materials during construction than as proposed in the 2011 EIR. Therefore, the proposed Project modifications to the Project would not result in new or more severe impacts. The impact on hazards and hazardous materials would be less than significant with mitigation.

3.15 Minor Issues

This Section briefly describes the resource categories included in the “Minor Issues” Section of the 2011 EIR. As analyzed in 2011, the Salt River Ecosystem Restoration Project would have negligible or no impact on Population and Housing, and Mineral Resources.

3.15.1 Population and Housing

As discussed in Section 3.15.1 of the Final EIR, no elements of the Project would alter population growth. The Project would not extend urban infrastructure into an unserved area; therefore, it would not induce population growth. Further, no housing would be removed from the Project site. The proposed Project modifications would not necessitate the construction of replacement housing and would result in no impact related to population and housing.

3.15.2 Mineral Resources

As discussed in Section 3.15.2 of the Final EIR, the proposed Project would not result in the loss of availability of any known mineral resources, including locally identified mineral resource recovery sites. The Project modifications would require relatively small quantities of gravel for the trail and parking area. Gravel would be imported but would not cause a significant impactful to mineral resources. Therefore, the proposed Project modifications are not anticipated to alter the availability of any known mineral resources. As discussed in the 2011 EIR, the Project would have a less than significant impact on mineral resources and the Project modifications do not alter this conclusion.

3.16 New CEQA Issues

The resources listed below were added to the CEQA Guidelines after the EIR was certified. The following sections provide an analysis of the proposed Project modifications with the following resource topics:

– Wildfire
– Energy
– Greenhouse Gas
– Tribal Cultural Resources

3.16.1 Wildfire

The Eel River area does not have an independent emergency response or evacuation plan. The Humboldt County HMP and EOP do not designate specific evacuation routes or emergency shelter locations or include policies or procedures with which the Project would conflict. A review of the Tsunami Inundation Map for Emergency Planning – County of Humboldt indicates that the Project would not impair emergency response activities nor established evacuation routes. Once constructed, the Project would not modify or inhibit vehicular access along Riverside Ranch Road, thus emergency response or evacuation via Riverside Ranch Road would not be impeded. The Project would not permanently impede access to any existing roads and pedestrian ways within the Project Area. Therefore, the Project would not impair implementation of or physically interfere with an established emergency response or evacuation plan. No impact would occur.

The Project Area contains few residential structures, and adjacent land generally consists of open agricultural pasture and farmland. The Project does not include construction of any structures for human occupancy.

Project construction could result in a low fire ignition risk, associated with a potential heavy machinery incident. Given the majority of the Project Area consists of tidally influenced, coastal marshlands and is characterized by a cool, humid climate, the risk of a wildfire within the Project Area is low. The Project construction would not otherwise increase exposure to wildfire above existing conditions. Additionally, because the Project is located in generally flat bottomlands, the risk of landslides associated with post-fire slope instability or changes in drainage is extremely low. Given the climate, coastal setting, and hydrological features within the Project Area, the risk of wildfire occurrence and lessen potential rate of spread is inherently low. The potential impact would be less than significant.

3.16.2 Energy

Construction

Construction of the Project would require use of heavy equipment, as discussed in Section 3.3 (Air Quality), and associated fuels (primarily gas, diesel, and motor oil). The precise amount of construction-related energy consumption that would occur is uncertain. However, construction would not require a large amount of fuel or energy usage because of the moderate number of construction vehicles and equipment, worker trips, and truck trips that would be required for a project of this scale. Trips expected to occur during Project construction would consist of approximately 5 per day, and construction equipment would remain staged in the Project Area once mobilized. Additionally, all material appropriate for reuse on-site would remain within the Project Area so truck trips to dispose of sediment off-site would not be required.

Excessive idling and other inefficient site operations would be limited with Air Quality Mitigation Measure 3.5.1-1.2 which limits idling time and provides measures to protect air quality. Equipment idling times would be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes or less (as required by the California airborne toxics control measure Title 13, Section 2485 of the California Code of Regulations [CCR]). Because of the relatively short initial timeframe needed to construct the estuarine restoration portion of the Project (approximately two construction seasons), and because Project construction would not encourage activities that would result in the use of large amounts of fuel and energy in a wasteful manner, impacts related to the inefficient use of construction-related fuels would be less than significant. Additionally, the Project would not conflict with or inhibit the implementation of SB 100 or other state regulations that are applicable to the Project.

Operation

The addition of public access opportunities to the Project Area would require use of personal vehicles to access the site. An estimated maximum of 32 vehicles daily, or 11,680 vehicles annually may travel to the site, which would result in an increase in fuel consumption as compared to existing fuel consumption in the area. However, the vehicles accessing the Project Area are subject to CARB's fuels and emissions standards; vehicle use for recreation would not result in inefficient, wasteful, or unnecessary consumption of fuels. A less than significant impact would occur.

3.16.3 Greenhouse Gas

Construction

Project construction activities would result in a temporary increase in GHG emissions, including exhaust emissions from on-road haul trucks, worker commute vehicles, and off-road heavy-duty equipment. Construction would require earthmoving, hauling, and delivery equipment, as used for similar projects, and which have been accounted for in the state's emission inventory and reduction strategy for both on and off-road vehicles. Therefore, a less than significant impact would occur.

Operation

During operation of the Project, some GHG emissions would occur from worker trips and recreational visits. Recreational visits initially would bring approximately 1,152 vehicles annually, during the 36 weekends per year that Riverside Ranch would be open to the public. The maximum number of vehicles the Project would be expected to bring to the Project Area if it was opened 365 days per year would be approximately 32 vehicles daily, or 11,680 vehicles annually to the site.

For reference, the BAAQMD's 2017 CEQA Guidelines identifies screening guidance for operational GHG pollutants; if a project meets the screening levels, the BAAQMD states that the project would not result in the generation of operational-related GHG that exceed their 2017 threshold of significance of 1,100 $MTCO_2e$/year. The operational screening levels include:

– Single-Family Residential: 56 dwelling units
– Elementary School: 44,000 square feet
– High School: 49,000 square feet
– Hotel: 83 rooms
– General Office Building: 12,000 square feet
– General Light Industry: 121,0000 square feet

Operation and maintenance of the Project would result in a fraction of the trip generation by the above land use screening levels. The Project would not result in substantial long-term operational emissions of GHGs, even when combined with annualized construction emissions. GHG emissions related to operation of the Project are considered less than significant.

The recommended next steps in the *First Update to the Climate Change Scoping Plan* (Scoping Plan) are broad policy and regulatory initiatives that will be implemented at the State level and, in general, do not relate to the construction and operation of this individual Project. Although Project construction may benefit from implementation of some of the state-level regulations and policies, such as the Phase 2 heavy-duty truck greenhouse gas standards proposed to be implemented within the transportation sector, the Project would not impede the state in implementing the policies. The Project would not conflict or impede the state

from implementing the broad policy and regulatory initiatives, and would comply with carbon sequestration goals, therefore, no impact would occur.

3.16.4 Tribal Cultural Resources

Prehistoric and historic resources of the project area were assessed in a March 2008 Cultural Resources Evaluation prepared by Roscoe and Associates (R&A). This evaluation included a California Historical Resources Information System (CHRIS) Records Search and results from Native American consultation. Consultation included a letter faxed to the Native American Heritage Commission on December 26, 2007 to search their Sacred Lands Inventory File and to provide a list of Native American representatives for the Project Area. The NAHC replied on December 28, 2007 that no sacred lands were present within the project area and provided a list of interested Native American tribes near the project area. A letter was sent to all representatives on the NAHC list on December 26, 2007. Representatives from the Wiyot Tribe and Bear River Band of the Rohnerville Rancheria replied to the letter. Consultation with Wiyot Tribal cultural representatives continued throughout the duration of the Project. Tribal consultation under AB52 is not required for this Addendum and therefore no additional consultation has occurred. No Tribal cultural resources were found in the area of the Project modifications.

Per Cultural Resource Mitigation Measure 3.11.1-1 (Cease work and conduct assessment Inadvertent Discovery of Cultural Resources) in the 2011 Certified EIR, work would cease and an assessment would be conducted in the case of inadvertent discovery of cultural resources or human remains. With the incorporation of Mitigation Measure 3.11.1-1, the impact to Tribal cultural resource would remain less than significant.

4. Alternatives

The proposed changes to the Project are minor and would not affect the relative comparison of alternatives presented in the 2011 Certified EIR. The proposed changes do not require the consideration of new or revised alternatives, because the environmental impacts are not substantially greater than previously reported, and there are no new significant effects.

5. CEQA Topical Analysis

5.1 Growth Inducement

The proposed Project modifications would not have any effect on growth, as the Project would not provide any new housing, infrastructure, or economic activity. Although it would reduce flooding of nearby agricultural lands, the project would not remove any obstacles to growth, expand infrastructure, or develop housing or economic activity. Growth-inducing impacts were found to be less than significant in the 2011 Certified EIR and would remain so for the modifications to the Project being evaluated in this EIR Addendum.

5.2 Unavoidable Significant Adverse Impacts

With implementation of mitigation measures, the original 2011 EIR did not identify any unavoidable adverse impacts. Similarly, all potentially significant impacts from the proposed Project modifications are mitigable to a less-than-significant level with the implementation of mitigation measures identified in the 2011 EIR.

5.3 Cumulative Impacts/Mitigation

Multiple natural resource projects, located on the outskirts of Ferndale in unincorporated agricultural areas, were identified and evaluated as relevant cumulative projects. These projects included:

– Connick Ranch – The Ranch was purchased by the Wildlands Conservancy in 2008 to create a wildlands preserve at the site to promote outdoor education and recreation while also providing opportunities for continued livestock grazing, habitat restoration and scientific research.
– Ferndale Wastewater Treatment Plant – The City of Ferndale is upgrading its Wastewater Treatment Facility (WWTF) to meet water quality and wastewater discharge standards.

Since the 2011 EIR, additional projects have been planned or implemented nearby or are expected to be implemented in 2023 or later, pending funding.

– Centerville Road Post Mile 4.62 Storm Damage Repair Project - Storm damage repair and sea level rise resiliency improvements at Centerville Beach County Park and along Centerville Road.
– Russ Creek and Centerville Slough Restoration Project Area Maintenance Prior to Construction - Storm damage maintenance of existing facilities such as sediment removal from drainages, culvert and tide gate repairs. Spartina removal ongoing in the Project Area via the Programmatic Spartina EIR (H.T. Harvey and GHD 2013).
– Russ Creek and Centerville Slough Restoration Project ongoing maintenance or other activities outside the Project Area but within the shared dike basin - Specific activities are currently unknown but could include existing berm and tide gate/culvert repairs/replacement.
– TWC Eel River Estuary Preserve Public Access Improvements - Construct barn renovations, vault toilet, parking and ADA access improvements. Increase public access to three days per week.
– Cannibal Island Restoration Project - Restoration of estuarine functions, including tidal channel excavation; culvert removals, modifications, and additions; dike repair; marsh grading; roadway elevating; construction of a setback-berm; and public access improvements.

- Williams Creek Restoration Project - Fisheries restoration and flood reduction project to improve habitat and sediment loading in Williams Creek. To be constructed concurrent with final one mile of Phase 2 of the Salt River Ecosystem Restoration Project.
- CDFW Eel River Wildlife Area Ocean Ranch Unit Restoration Project (ORU) - Tidal and dune restoration of the Ocean Ranch Unit, including invasive plant removal, wetland enhancement, and aquatic habitat improvement. Project would restore and enhance approximately 473 acres of salt marsh and 279 acres of coastal dunes.
- Upslope Sediment Reduction - Sediment reduction/erosion control actions in the Salt River watershed, including, Russ Creek and Shaw Creek watersheds, are ongoing with landowners. Includes improving road drainage as well as channel restoration, riparian planting, bank stabilization, livestock fencing, and modification and removal of fish barriers. Primarily intended to improve water quality in the lower Eel River, while enhancing the hydrologic function to reduce turbidity or sediment load and resulting sediment deposition in the lower watersheds. Most projects are landowner led with technical and cost share assistance from the Natural Resources Conservation Services (NRCS).
- Ferndale Drainage Improvement Project - Drainage improvements in the City of Ferndale, near the fairgrounds, to reduce local flooding.
- Ferndale Wastewater Treatment Plant Improvements - Improvements to the berm surrounding the Ferndale wastewater treatment ponds to improve separation with Francis Creek during high flow events and local flood conditions.
- Potter Valley Project Modifications - Potential decommissioning or modification of the Potter Valley Project, which may result in fisheries and water quality benefits to the downstream Eel River, including the estuary.
- Smith Creek Tide Gate Replacement and Wetland Enhancement Project - Potential tide gate relocation and wetland enhancements on the NRCS Wetland Reserve Easement, approximately 50 acres in size.

The cumulative impacts identified in the 2011 EIR include issues regarding: hydrology and geomorphology, water quality, geology and soils, air quality, noise, aesthetics, land use, recreation, transportation/traffic, public services, utilities and service systems, and hazardous materials. The majority of these projects are related to habitat restoration or developed to improve hydrologic and water quality conditions.

The various cumulative projects would not have overlapping soils or geologic impacts. The proposed Project would not contribute to public service or utility impacts. The contribution of the Proposed Project to impacts on recreation, when combined with other projects in the vicinity, would be less than cumulatively considerable because the project would have a beneficial impact to recreational resources. The proposed project would not add to any cumulative impacts to visual resources because it would recreate a natural-looking aesthetic character in the project area. The contribution of the proposed Project to land use impacts, when combined with other projects in the vicinity, would be less than cumulatively considerable because the projects would comply with applicable land use plans and policies, and would not conflict with adjacent land uses.

Frequent and prolonged inundation of agricultural lands in the vicinity in recent decades has resulted in a loss of agricultural productivity. Some of the projects listed above propose conversion of agricultural lands to wetlands and riparian areas. The cumulative impact of these projects on agricultural land could be significant. However, this Addendum does not propose to convert agricultural land because the area is currently restored habitat.

Construction of each project could result in short-term impacts to sensitive biological resources, such as special status species, wetlands, and riparian habitat. However, these impacts would be mitigated through

surveys and avoidance measures, and BMPs. The proposed mitigations would reduce the project's contribution to cumulative air quality, noise, cultural resources, transportation, and hazardous material impacts to less than significant. The proposed Project would mitigate for any potential significant impacts and therefore would not contribute to cumulative impacts.

5.4 Irreversible/Irretrievable Impacts

The 2011 EIR described that the Salt River Ecosystem Restoration Project would permanently convert land to wetland and public access uses, including:

- The irretrievable conversion of upland and permanent and seasonal freshwater wetland habitat to aquatic and tidal wetland habitat,
- The loss of a locally unique historic agricultural landscape, including historic houses and dairy structures, and other agricultural lands.
- The irretrievable use of natural resources including fuels.

The proposed Project modifications would not contribute to these impacts.

5.5 Environmentally Superior Alternative

The 2011 Certified EIR identified the Environmentally Superior Alternatives as Alternative 3, (Riverside Ranch and the adjacent lower portion of the Salt River, as well as upland restoration, but not the bulk of the Salt River channel restoration), although it noted that even this alternative and mitigation, would result in some significant adverse impacts. The proposed Project has since been constructed. There are no new impacts related to the public access and berm modification, therefore the relative comparison of alternatives does not change and there is no need to evaluate further alternatives related to this minor change in the Project.

6. Conclusions

The proposed addition of public access amenities and levee modifications would not alter any of the conclusions of the 2011 EIR. No new significant environmental effects or a substantial increase in the severity of previously identified significant effects would result. The additions would not affect any of the mitigation measures, including their feasibility or implementation. As mentioned above, none of the conditions listed in Section 15162 of the CEQA Guidelines exist for the Project modifications described herein. Therefore, pursuant to Section 15164 of the CEQA Guidelines, the differences between the approved Project described in the 2011 EIR and the modifications of the Project as currently proposed and described in this Addendum are minor and this Addendum provides sufficient environmental documentation.

7. References

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