

Addendum No. 4 to the  
Mitigated Negative Declaration for the  
**Lower American River Anadromous Fish Habitat  
Restoration Project**



Prepared for:  
City of Sacramento

April 2021

State Clearinghouse No.  
2019069088

Prepared by:





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Mitigated Negative Declaration for the

# **Lower American River Anadromous Fish Habitat Restoration Project**

State Clearinghouse No. 2019069088

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# Abbreviations and Acronyms

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City	City of Sacramento
CEQA	California Environmental Quality Act
cy	Cubic yards
CVPIA	Central Valley Project Improvement Act
EIR	Environmental Impact Report
IS	Initial Study
ft	foot
FISH Group	Lower American River Fisheries and In-Stream Habitat Working Group
GHG	greenhouse gas
LAR	Lower American River
LWM	large woody material
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
ND	Negative Declaration
No.	number
PM	particulate matter
Project	Lower American River Anadromous Fish Habitat Restoration Project
Reclamation	U.S. Bureau of Reclamation
SMAQMD	Sacramento Metropolitan Air Quality Management District
Water Forum	Sacramento City-County Office of Metropolitan Water Planning (Water Forum)

# 1. Introduction

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## 1.1 Background

In partnership with the Sacramento City-County Office of Metropolitan Water Planning (Water Forum), the City of Sacramento (City), as lead agency under the California Environmental Quality Act (CEQA),<sup>1</sup> publicly distributed the Initial Study/proposed Mitigated Negative Declaration (IS/MND) for the Lower American River (LAR) Anadromous Fish Habitat Restoration Project (Project)<sup>2</sup> on June 20, 2019, for a 30-day public review period (State Clearinghouse Number [No.] 2019069088). The City adopted the MND and a Mitigation Monitoring and Reporting Program (MMRP) and approved the Project at its City Council meeting on August 20, 2019. The City prepared Addenda No. 1<sup>3</sup>, No. 2<sup>4</sup>, and No 3<sup>5</sup> to the MND to address minor technical changes or additions (refinements) to the proposed Project that were made to ensure timely implementation of the Project within endangered species constraints and to support continued compliance with restoration requirements specified in the Central Valley Project Improvement Act (CVPIA). Copies of the IS/MND, MMRP, and Addendum Nos. 1, 2, and 3 are available for review at the Water Forum’s office at 1330 21<sup>st</sup> Street, Sacramento, CA 95811, and online at the City’s Web site: <https://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>.

The City has now prepared Addendum No. 4 to the MND to address minor technical changes or additions to the proposed Project (hereafter referred to as the Project refinements) for updates to the design and implementation of the Ancil Hoffman Park restoration site in 2021.

State CEQA Guidelines Section 15164(b) states that an addendum to an adopted Negative Declaration (ND) (or MND) may be prepared if only minor technical changes or additions are necessary and none of the conditions described in Section 15162 calling for the preparation of a subsequent Environmental Impact Report (EIR) or ND have occurred. The City has determined that the Project refinements (described in Section 2, “Project Refinements”) are necessary, but none of the conditions described in State CEQA Guidelines Section 15162 (see Section 1.2, “Regulatory Context”) requiring preparation of a subsequent EIR (or subsequent ND or subsequent MND) would occur with the minor Project changes. Therefore, the City has prepared this Addendum No. 4 to the Project MND in accordance with State CEQA Guidelines Section 15164.

## 1.2 Regulatory Context

As described in State CEQA Guidelines Section 15162(a), when an EIR has been certified or ND adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency

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<sup>1</sup> CEQA is found at California Public Resources Code, Sections 21000 et seq., and the State CEQA Guidelines are found at California Code of Regulations, Title 14, Section 15000 et seq.

<sup>2</sup> City of Sacramento and Bureau of Reclamation. 2019 (August). *Environmental Assessment/Initial Study and Proposed Mitigated Negative Declaration for the Lower American River Anadromous Fish Habitat Restoration Project*. State Clearinghouse No. 2019069088. Available: <https://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>. Accessed: September 10, 2019.

determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- 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.

State CEQA Guidelines Section 15164(b) states that a lead agency may prepare an addendum to an adopted ND (or MND) if only minor technical changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR or ND (or MND) have occurred. The analysis in Section 3, "Environmental Analysis," below, demonstrates based on substantial evidence in light of the Project's administrative record that the proposed changes to the Project would not result in any of the conditions described in Section 15162. Because none of these conditions have occurred, the lead agency shall determine whether to prepare a subsequent ND (or subsequent MND), an addendum, or no further documentation (State CEQA Guidelines Section 15162[b]).

The City, as lead agency, has determined to prepare this Addendum No. 4 to the MND, in accordance with State CEQA Guidelines Section 15164(a), to present the proposed Project changes, provide the additional CEQA impact analysis and substantial evidence to address the potential environmental effects of the proposed Project changes, and supplement the administrative record for the Project.



## 2. Project Refinements

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### 2.1 Background

The Project involves implementation of several activities intended to create and enhance Chinook salmon and steelhead spawning and rearing habitat in the LAR by replenishing spawning gravel and establishing additional side-channel habitat. As described in the IS, restoration activities are proposed to be implemented at up to 10 restoration sites from 2019 through 2034. Restoration activities are typically implemented at one restoration site each year, but as described in the IS, more than one site per year may be implemented if funding is available. Restoration activities at the Upper Sailor Bar restoration site were successfully completed in 2019. To plan restoration activities through 2034, the City, in partnership with the U.S. Bureau of Reclamation (Reclamation) and the LAR Fisheries and In-Stream Habitat Working Group (FISH Group), prepared conceptual designs for all 10 restoration sites. The conceptual designs informed hydraulic modeling to support the impact analyses in the IS. The City will continue to coordinate on-going monitoring of habitat improvements developed as part of the Project. Based on monitoring, prior to construction each year, the City and FISH Group re-evaluate restoration plans and the suite of restoration components appropriate for each site to verify that each site's final design will contribute to the overall restoration goal.

### 2.2 Site-Specific Modifications at Ancil Hoffman Park

The IS analyzed general Project features to be constructed at Ancil Hoffman Park. As the design for improvements at Ancil Hoffman Park has been advanced, there are several Project refinements that are evaluated in this Addendum No. 4. Proposed improvements to be constructed in 2021 at Ancil Hoffman Park are illustrated in Figure 1. These Project refinements include:

- The IS identified a 64-acre study area at Ancil Hoffman Park. The refined design includes improvements that would occur within the study area addressed in the IS. However, access and staging would occur on a developed parking lot that is outside the 64-acre study area, and trucks would travel from this access point into the study area. No new grading or improvement of the access route is included in the Project.
- To facilitate site access, a temporary crossing would be constructed across an intermittent drainage within the 64-acre study area. The crossing would be approximately 16 feet wide by 25 feet long and would be constructed by placing geotextile on the bed and bank, and piling cobble to a height that would accommodate construction equipment. The cobble and geotextile would be removed immediately after construction, avoiding any significant impacts to water quality.
- The IS analysis addressed 7 acres of spawning habitat creation, and the refined design would include 6.7 acres. The dimensions of the spawning habitat would differ from what was addressed in the IS, with an approximately 1,350 linear foot (lf) area of spawning habitat compared to 700 lf that was considered in the IS; however, the IS also considered an approximately 1,850 lf side channel. No side channel is included in the proposed design, so the total linear footage proposed for grading and modification would be similar to or less than the area considered in the IS.

- The IS identified approximately 11,500 cubic yards (cy) of gravel to be placed at the Ancil Hoffman site. The refined design would place approximately 15,900 cy of gravel. However, the IS indicated that gravel would be obtained from borrow sites at Mississippi Bar and Sailor Bar. The refined design would source gravel on-site, substantially reducing the impacts associated with transport and handling of the material.
- The IS Project Description specified that woody material could be sourced from within the watershed if not available on site. This material would be brought to the site on a flatbed truck.
- The IS identified the creation of habitat featuring large woody material (LWM), with material anchored by timber piles. Based on refined designs, up to three, approximately 3-foot diameter boulders per LWM structure (obtained from within the watershed) would be used to anchor the LWM structures due to potential difficulties installing timber piles in areas with shallow bedrock. Additionally, subsurface steel rebar and chain may be used to secure ballast boulders to the LWM structure.

**Figure 1: Ancil Hoffman Park Restoration Site, Access, and Staging**

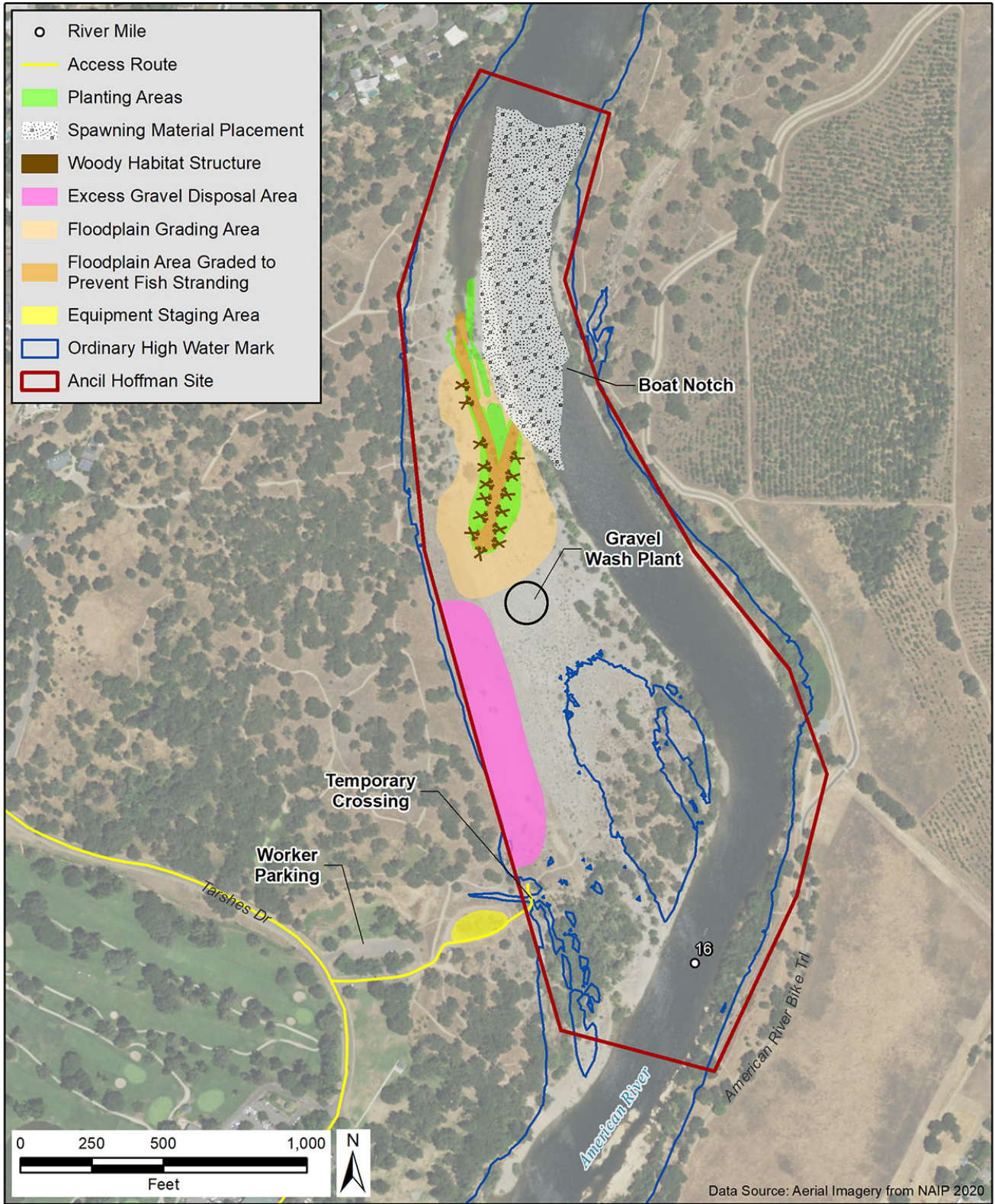


Figure Source: GEI Consultants, Inc. 2021.

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# 3. Environmental Analysis

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This section of the addendum analyzes the potential effects on the physical environment from implementing the Project refinements. This analysis has been prepared to determine whether any of the conditions in State CEQA Guidelines Section 15162 (described in Section 1.2) would occur from the Project refinements.

The Project refinements associated with updates to the design and implementation of the 2021 Ancil Hoffman Park restoration site would not cause any new significant impacts or a substantial increase in the severity of significant effects previously identified in the IS for the resource areas listed below, and/or would not be affected to any greater degree than that analyzed in the IS:

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral Resources
- Population, Housing, and Employment
- Public Services
- Utilities and Service Systems
- Wildfire

The following topic areas may be affected by the proposed Project refinements and, therefore, are analyzed below:

- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources

### 3.1 Air Quality

The Project refinements would not result in new significant impacts or increase the severity of significant impacts previously identified in IS Section 1.3, “Air Quality.” The IS evaluated expected annual and daily construction-related emissions associated with gravel placement and side channel improvements. As discussed in the IS, construction equipment would use Best Available Control Technology and implement dust control Best Management Practices in accordance with current Sacramento Metropolitan Air Quality Management District (SMAQMD) guidance (as part of the Project). Additionally, daily (for reactive organic gases, nitrous oxides, and particulate matter) and annual emissions of all criteria air pollutants would be below applicable SMAQMD thresholds of significance.

Daily emissions from Project activities estimated in the IS would occur between July and September. Additional emissions from Project refinements would overlap daily emissions estimated for the Project in the IS. Placement of an additional 4,400 cy of gravel at the Ancil Hoffman site would not affect the daily emissions estimates reported in the IS because the same equipment would be used on a daily basis. The Project refinements would generate a very small amount of additional emissions each year from truck trips associated with the transport of woody material and ballast boulders to the Project site via a flatbed truck. However, Project refinements include sourcing gravel on-site instead of trucking in gravel from either the Mississippi Bar and/or Sailor Bar Borrow Sites, as evaluated in the IS, which would reduce emissions generated from truck trips. The larger reduction in truck trips that would have been associated with gravel transport would offset the small number of additional truck trips needed to bring woody material and ballast boulders to the site. Therefore, the overall number of truck trips would be similar to or less than what was evaluated in the IS and daily emissions of criteria air pollutants would not exceed applicable daily SMAQMD thresholds. Since annual emissions of particulate matter estimated for the Project in the IS are substantially lower than SMAQMD thresholds of significance (approximately 4 percent or less of applicable thresholds), potentially adding a small amount of new emissions, much less than was estimated for the Project in the IS, would not substantially increase annual emissions. Therefore, this impact would remain **less than significant**.

The Sacramento Valley Air Basin is currently designated as being in nonattainment for Federal and State ambient air quality standards for ground-level ozone, as well as for Federal standards for PM<sub>2.5</sub> (fugitive dust). Past, present, and future development projects contribute to the region’s significant cumulative air quality impacts. SMAQMD’s approach to thresholds of significance was used to evaluate if the proposed Project’s individual emissions would result in a cumulative considerable adverse contribution to Sacramento Valley Air Basin’s existing significant cumulative impacts on air quality. The Project would not exceed SMAQMD’s daily or annual emissions thresholds and the Project refinements, as discussed above, would not make a cumulatively considerable incremental increase in daily or annual emissions since truck trips would be similar to or less than what was evaluated in the IS. The Project refinements would not conflict with or obstruct implementation of applicable air quality plans because they would not violate any air quality standard and would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable Federal or State ambient air quality standard. This impact would remain **less than significant**.

While residences and recreational facilities, including the American River bike trail, are within the American River Parkway and nearby adjacent areas, the Project refinements are not expected to expose sensitive receptors to substantial pollutant concentrations, given the short-term nature of emissions

associated with equipment use for implementation of Project refinements and the distance of residences and active recreation facilities from the Ancil Hoffman Park restoration site. This impact would remain **less than significant**.

## 3.2 Cultural Resources and Tribal Cultural Resources

The Project refinements would not result in new significant impacts or increase the severity of significant impacts previously identified in IS Sections 1.5, “Cultural Resources” and 1.18, “Tribal Cultural Resources.” Project refinements include using an access and staging area located immediately outside the study area, which was not previously evaluated for cultural or tribal cultural resources. However, aerial photography does not show any features that might be associated with historic-era resources and the access and staging activities would not include ground-disturbing activities that could impact undiscovered archaeological resources, tribal cultural resources, or human remains. Therefore, the Project refinements would not increase impacts and would be consistent with the evaluation in the IS. Therefore, this impact would remain **less than significant**.

## 3.3 Greenhouse Gas Emissions

The Project refinements would not result in new significant impacts or increase the severity of significant impacts previously identified in IS Section 1.8, “Greenhouse Gas Emissions.” Project refinements would potentially generate a very small amount of additional greenhouse gas emissions (GHG) from haul trips due to the transport of woody material and ballast boulders to the site. However, design refinements would also reduce GHG emissions because gravel would be sourced on-site instead of transported from the Mississippi Bar and/or Sailor Bar Borrow Sites, as previously evaluated in the IS. Therefore, the overall number of truck trips are expected to be fewer than were evaluated in the IS. Furthermore, since annual emissions of GHGs estimated for the Project in the IS are substantially lower than SMAQMD’s GHG threshold of significance (approximately 21 percent of the threshold), adding a small amount of new emissions, less than what was estimated for the Project, would not substantially increase annual emissions. Therefore, this impact would remain **less than significant**.

## 3.4 Hydrology and Water Quality

The Project refinements would not result in new significant impacts or increase the severity of significant impacts previously identified in IS Section 1.10, “Hydrology and Water Quality.” Project refinements could include use of up to three, approximately 3-foot diameter boulders per LWM structure, which would be obtained within the watershed and would be used to anchor the LWM structures. The use of boulders instead of timber piles to anchor these LWM structures, as appropriate for site-specific conditions, would not substantially change the roughness or obstruct river flow beyond what was reported in the hydraulic modeling supporting the IS analysis. Previous modeling sufficiently analyzed the hydraulic effects from Project activities, including Project refinements. This impact would remain **less than significant**.

To facilitate access to the site, Project refinements would include installation of a temporary crossing covering an intermittent drainage near the western edge of the study area. Geotextile material would be placed on the bed and bank, and cobble would be piled to a height necessary to accommodate movement of construction equipment across the drainage. Following construction activities, the cobble and geotextile would be removed, restoring the intermittent drainage to its pre-project condition. The IS identified potentially significant construction-related water quality impacts. Implementation of Mitigation Measure GEO-1 (Prepare and Implement a Storm Water Pollution Prevention Plan and

Associated Best Management Practices), which was previously adopted and incorporated into the Project, would reduce the potential for impacts to water quality following Project construction, including the proposed Project refinements, to a less-than-significant level. This impact would remain **less than significant**.

### 3.5 Recreation

The Project refinements would not result in new significant impacts or increase the severity of significant impacts previously identified in IS Section 1.10, "Recreation." As stated in IS Section 1.16, temporary, short-term impacts to recreational access and safety of recreationists would occur due to construction-related traffic and possible road closures. Project refinements would include temporary closure of an existing parking area within Ancil Hoffman Park, temporarily reducing recreational access to nearby areas of Ancil Hoffman Park. This temporary impact related to recreational access would not increase the impact compared to the analysis in the IS. This impact would remain **less than significant**.

### 3.6 Transportation and Traffic

The Project refinements would not result in new significant impacts or increase the severity of significant impacts previously identified in IS Section 1.17, "Transportation." Project refinements would include accessing the site from the access and staging area, along an access route that was previously included in the IS. Additionally, Project refinements could include transport of woody material and ballast boulders to the site via a flatbed truck, which would result in a small number of additional material transport trips. However, the refined design would also allow gravel to be sourced onsite instead of being transported from the Mississippi Bar and/or Sailor Bar Borrow Sites, which would result in the reduction of 3,500 one-way trips. Sourcing gravel on-site would greatly reduce the number of truck trips required for Project activities and would more than offset the increased trips required to bring woody material and ballast rock to the study area. Therefore, truck trips would be similar to or less than what was evaluated in the IS and this impact would remain **less than significant**.



# 4. Conclusions

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As described in the preceding sections, this Addendum No. 4 to the Project MND adopted in 2019 analyzes the following proposed changes to the Project:

- Refinements to the design for habitat restoration at Ancil Hoffman Park.

Based on the analysis and substantial evidence in Section 3, “Environmental Analysis,” the proposed Project changes described in this addendum would not result in any of the conditions described in Section 15162 of the State CEQA Guidelines calling for preparation of a Subsequent EIR, ND, or MND. In summary, the proposed Project changes would not:

- result in any new significant environmental effects,
- substantially increase the severity of previously identified significant effects,
- result in mitigation measures or alternatives previously found to be infeasible becoming feasible, or
- result in availability/implementation of mitigation measures or alternatives that are considerably different from those analyzed in the previous document that would substantially reduce one or more significant effects on the physical environment.

These conclusions confirm that a subsequent MND is not required, and this Addendum No. 4 to the MND adopted in 2019 is the appropriate CEQA document under State CEQA Guidelines Section 15164 to evaluate the Project changes and resulting environmental impacts thereof. This Addendum No. 4 is added to the administrative record for the Project. No changes are needed to the MND or MMRP adopted in 2019.

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