Addendum No. 6 to the Mitigated Negative Declaration for the

Lower American River Anadromous Fish Habitat Restoration Project



Prepared by:



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Lower American River Anadromous Fish Habitat Restoration Project

State Clearinghouse No. 2019069088

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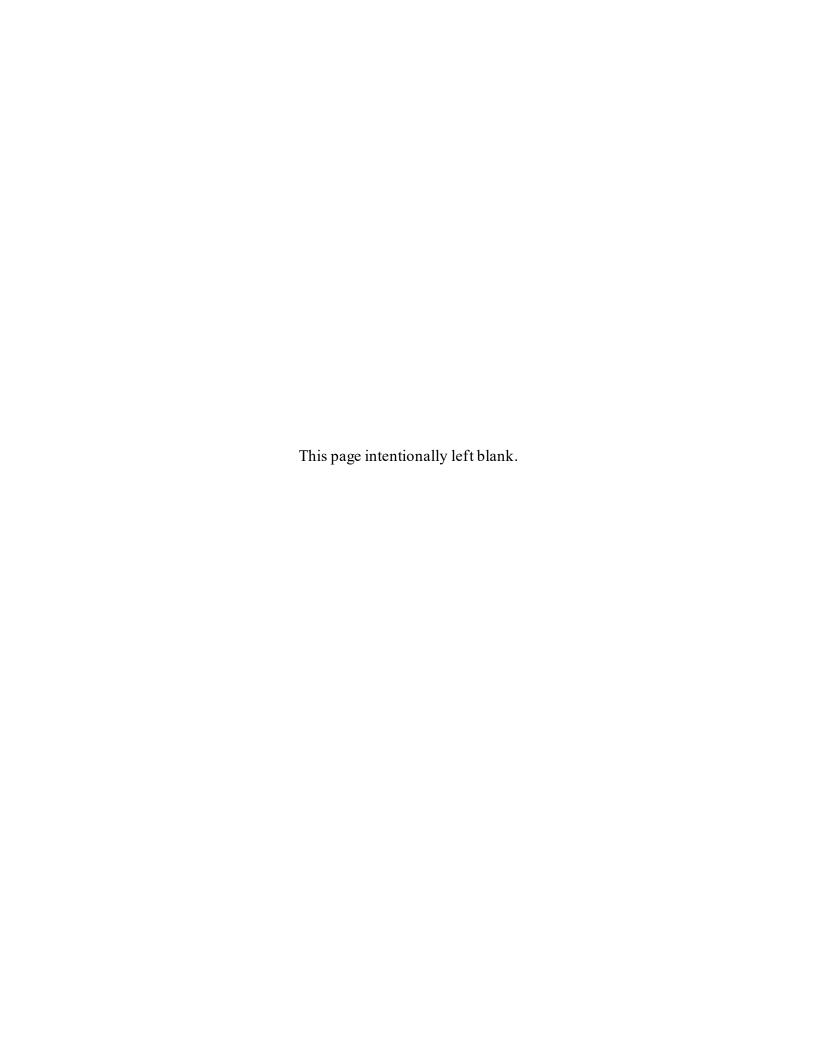


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Abbreviations and Acronyms

APE Area of Potential Effect
City City of Sacramento

CEQA California Environmental Quality Act
CVFPB Central Valley Flood Protection Board
CVPIA Central Valley Project Improvement Act

cfs cubic feet-per-second

cy Cubic yards

EIR Environmental Impact Report
GHG Greenhouse Gas Emissions

IS/MND Initial Study/Mitigated Negative Declaration

ITE Institute of Transportation Engineers

LAR Lower American River

MMRP Mitigation Monitoring and Reporting Program

MND Mitigated Negative Declaration
NCIC North Central Information Center

ND Negative Declaration

No. Number

PM_{2.5} particulate matter equal to or less than 2.5 micrometers in

diameter

Project Lower American River Anadromous Fish Habitat

Restoration Project

SHPO State Historic Preservation Office

SMAQMD Sacramento Metropolitan Air Quality Management District

Water Forum Sacramento Area Water Forum

1. Introduction

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), 1 publicly distributed the Initial Study/proposed Mitigated Negative Declaration (IS/MND) for the Lower American River (LAR) Anadromous Fish Habitat Restoration Project (Project)² 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, No. 2, No. 3, No. 4, and No. 5 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, 3, 4, 5, and 6 are available for review at the Water Forum's office at 1330 21st 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. 6 to the MND to address minor technical changes or additions to the proposed Project (hereafter referred to as the Project refinements). These proposed refinements consist of a change to the Area of Potential Effect (APE), new quantities for total site work (cut/fill), potential disposal of borrow material at the Mississippi Bar site, and additional maintenance activities, if needed. The proposed refinements are described in Section 2, "Project Refinements."

State CEOA 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. 6 to the Project MND in accordance with State CEOA Guidelines Section 15164.

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 seg.

City of Sa cramento 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.

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 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. 6 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.

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2. Project Refinements

2.1 **Changes to Area of Potential Effect**

Based on updated construction designs, the project refinements include modification to the project site boundary and APE at all 10 habitat sites to reflect more conservative and precise boundaries for all potential disturbance related to cut and fill, staging, and interim gravel placement that may occur prior to full restoration or enhancement at a given site (See Figure 1). A reduction of the project site boundary and APE would occur at all sites except Lower Sunrise, Nimbus Basin, El Manto, and Sacramento Bar, where expansions would occur. The modified project site and APE would result in a net decrease of approximately 92 acres in the overall footprint of the project site and APE.

Changes in Material Handling

The IS identified an annual maximum volume of 30,000 tons or approximately 21,000 cubic yards (cy)³ of material to be placed in the river each year. Although the amount of material placed in the river will remain within the boundaries identified in the IS, the annual maximum volume of materials that could be hauled between project sites would increase to approximately 140,000 cy⁴. The project description for the IS anticipated that spawning material would be transported from borrow sites at Mississippi Bar and/or Sailor Bar to the individual replenishment sites, and then placed in the river at those sites. More detailed designs now include cut and fill of material at individual project sites to create or enhance spawning or rearing habitat elements, modifying surface topography, and the use of onsite excavated material that has been sorted to obtain spawning-sized gravel and cobble, in the streambed rather than relying solely on material transported from the borrow sites. However, some of the sites do not have a balance of material to be removed and placed in the river. For these sites, when material is needed at the sites (i.e., more fill is required than cut generated) the material could come from other replenishment sites prior to use of Sailor Bar or Mississippi Bar. For example, at Sacramento Bar, more detailed design identifies construction of a new side channel which would require interim placement of surplus material from other sites into existing remnant dredger ponds to accommodate the larger eventual design plan to focus flows into a proposed side channel. Additionally, interim placement of material, at a site like Sacramento Bar, may not occur in the same year that a full restoration project is implemented at Sacramento Bar. A priority will be placed on maintaining a net cut and fill balance within the American River floodway, where possible.

The IS analyzed gravel additions at up to three sites per year, with a total of approximately 30,000 tons of gravel to be placed in the river. Work would be conducted over approximately four weeks (20) working days) per site for a total of 60 working days per year. Using a 24-ton truck, the IS identified

³ The conversion factor associated with tonnage to cubic yardage calculations are dependent on the subject material (sand, gravel, cobble, etc.) but these values represent assumptions based on previous project implementation and material composition encountered during test pits.

⁴ This quantity represents the maximum volume of potential excess material expected to be generated at any one of the project sites in a single year (estimated based on Upper River Bend Phase 2 quantities developed through 60% design and modeling efforts).

approximately 59 one-way trips per day to transport gravel. The IS also considered traffic from daily worker trips to the site.

Delivery of gravel to any site would not occur at the same time as delivery to another site. Because the proposed refinements to the project would increase the annual maximum amount of hauling between sites to a total of approximately 140,000 cy, the timeframe for hauling and processing of materials would increase to up to 30-weeks (150 working days). This increased duration for work outside of the wetted channel of the American River would allow additional material to be processed while avoiding air emissions in excess of thresholds and avoiding increases to the number of truck trips per day. In-river work would occur during flows of less than 4,000 cubic feet-per-second (cfs). Hauling of gravel outside of the project sites would remain limited to Monday through Friday, except holidays, from 7 a.m. to 5 p.m.

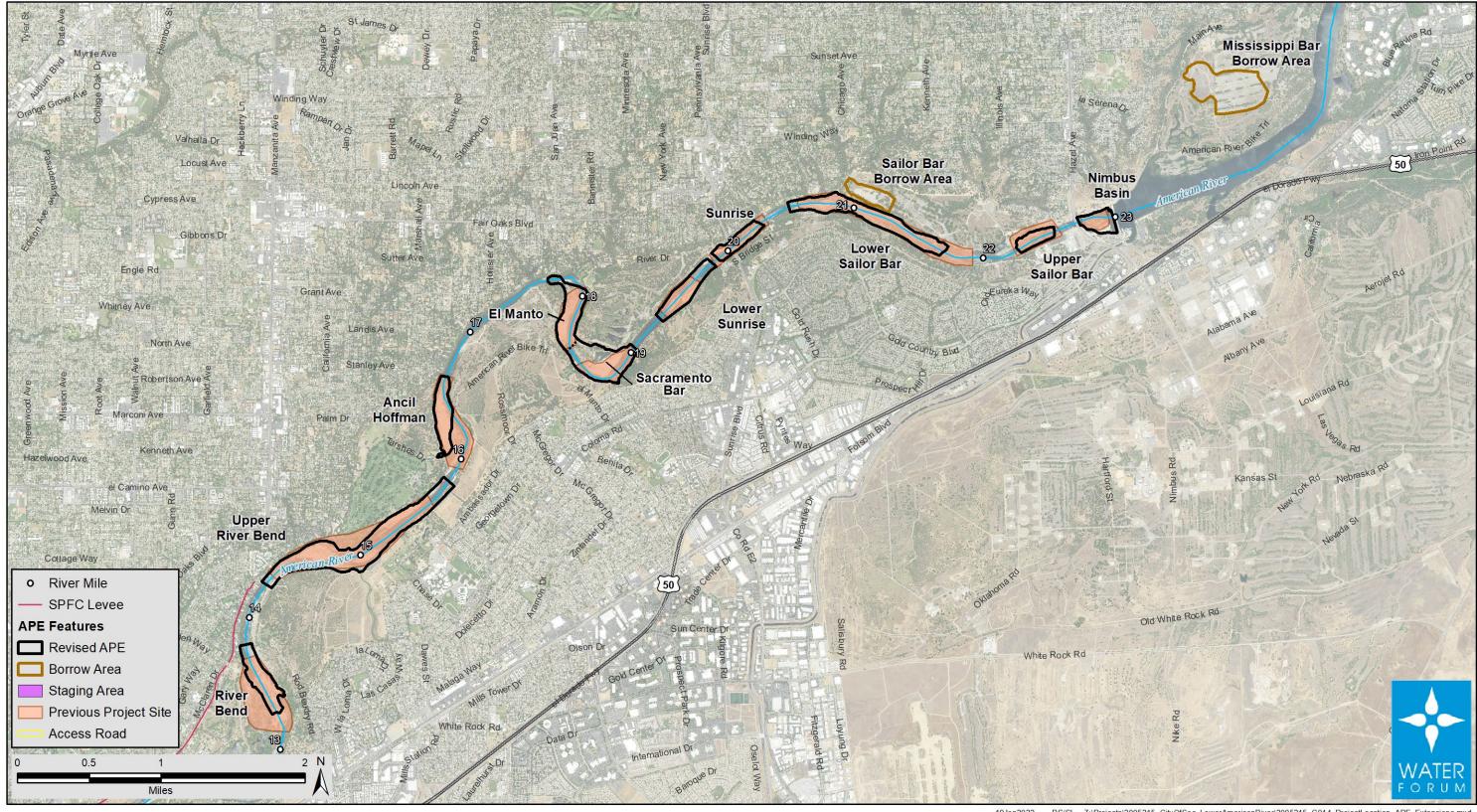
The project refinements may include beneficial reuse of excess grading materials within the American River Parkway in coordination with other entities/agencies conducting work at permitted sites along the LAR. If reuse within the Parkway or offsite is not possible, a portion of the Mississippi Bar Borrow Area located within the revised APE may be used for excess material (non-spawning sized) disposal resulting from work at any of the habitat sites, if needed.

2.3 Additional Maintenance Activities

Additional maintenance activities such as grading, or gravel placement may be necessary following completion of habitat sites to mitigate for any unforeseen events such as an extreme flooding event or excess erosion. These maintenance activities would be allowed as stated in the Central Valley Flood Protection Board (CVFPB) permits and would be conducted within the design and hydraulic parameters as detailed in the drawings associated with the individual site's CVFPB permit.

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Figure 1. Change in Area of Potential Effect



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3. Environmental Analysis

This section of the addendum analyzes the potential effects on the physical environment from implementation of the proposed refinements to the Project. 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 as a result of the proposed Project refinements.

The proposed Project refinements would not cause any new significant impacts or a substantial increase in the severity of significant effects previously identified in the IS for the topic areas listed below because the activities associated with the proposed refinements would already occur under the approved Project, were analyzed in the IS/MND, would not be affected to any greater degree than that analyzed in the IS:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- 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
- Biological Resources
- Cultural and Tribal Cultural Resources
- Greenhouse Gas Emissions
- Recreation
- Transportation and Traffic

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 SMAQMD guidance (as part of the Project). The daily emissions from Project activities estimated in the IS would occur during four to six weeks of work annually, however, project refinements would extend the construction time frame to accommodate hauling of up to 140,000 cy of fill material per year. Therefore, instead of the minimum four-week timeframe originally considered in the IS, the construction time frame would be extended to up to 30 weeks to avoid increasing daily air emissions associated with hauling. While daily emissions would not increase, annual emissions would increase from additional hauling. The project would generate approximately 1.33 tons/year of PM₁₀, and 0.53 tons/year of PM_{2.5} from hauling. Additionally, project refinements include a greater balance between cut and fill placed at each habitat site, reducing the number of hauling trips needed to take material from borrow sites to the habitat sites and reducing haul trips in most years. However, hauling between habitat sites would increase during certain years. When possible, to reduce hauling, fill material would be placed within the project site boundary of a habitat site for later use, in consultation with Regional Parks. This impact would remain less than significant.

The Project refinements also include maintenance activities as permitted by CVFPB. These maintenance activities could generate additional truck trips if an extreme flooding event or excess erosion were to occur. However, the number of truck trips that would be needed for these maintenance activities would be minimal and daily truck trips would remain below the 59 daily trips analyzed in the IS. 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 particulate matter equal to or less than 2.5 micrometers in diameter (PM2.5)(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. 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. Therefore, the Project refinements would not increase impacts and would be consistent with the evaluation in the IS. This impact would remain less than significant.

3.2 Biological Resources

The Project refinements would not result in new significant impacts or increase the severity of significant impacts previously identified in IS Sections 3.4, "Biological Resources". The Project refinements would include a change to the project site boundary from the extended cut and fill limits,

staging, and interim gravel placement. However, the areas which would be included in the project site as a result of the project refinements represent a similar range of habitat types to those already present in the project site. Furthermore, although material handling and hauling could occur over a longer duration in some years, neither the revised project sites nor the extended schedule would lead to increased impact on special-status species because surveys and worker awareness training would be conducted prior to Project construction, as stated in Mitigation Measures BIO-3, "Minimize Effects to Valley Elderberry Longhorn Beetle," and BIO-4, "Minimize Effects on Special-status Species and Nesting Birds," within the IS Additionally, the amount of gravel that would be placed in the river each year is consistent with what is analyzed in the IS, so impacts to fisheries and fish species would not change compared to the analysis in the IS. The Project refinements would not increase impacts and would be consistent with the evaluation in the IS. Therefore, biological resources impacts would remain **less than significant with mitigation.**

3.3 Cultural and Tribal Cultural Resources

Because the Project refinements include new areas which were not addressed in the IS, GEI conducted additional pedestrian surveys and an updated record search.

Results of Additional Pedestrian Surveys

On January 21, 2022 and January 24, 2022, GEI archaeologist Jesse Martinez conducted a pedestrian survey of areas not previously surveyed at Upper Sailor Bar, Lower Sailor Bar, Sunrise, El Manto/Sacramento Bar, Upper River Bend, and Ancil Hoffman (See **Figure 1**). These areas were selected for survey because review of satellite photographs indicated that these areas might differ in terms of topography or vegetation compared to other nearby areas that were surveyed previously, potentially resulting in differing archaeological sensitivity.

The pedestrian surveys determined that the new areas were similar to nearby areas within the original project boundary, generally characterized by recently deposited material, including cobbles, and tailings piles. Based on the results of the surveys, the areas proposed to be added to the project site as part of the Project refinements do not have higher sensitivity for archaeological resources than the areas previously included in the project site. In addition, no newly identified cultural resources were encountered.

Results of Updated Record Search

An updated records search was requested because it has been seven years since the last records search was conducted. The search was conducted at the North Central Information Center (NCIC). The NCIC responded by letter via email on January 21, 2022 (NCIC File No.: SAC-22-23). The letter stated that a total of three isolated finds, nine sites, and one district fell within the project boundary. Each is briefly described below.

Isolated Finds

Isolated finds consist of cultural resources consisting of a single artifact or feature generally lacking any context. As such, unless the isolated find represents the only type of its kind or the best example of its type and thus a unique archaeological resource, isolated finds are generally not eligible for listing in the California Register of Historical Resources and thus not significant for purposes of CEQA.

P-34-002168

P-34-002168 consists of a pre-contact bedrock milling feature. It is located approximately 492 feet directly opposite Gate 14 downstream of the Nimbus Dam. The feature contains at least six mortars made in bedrock. When recorded, the feature was partially submerged and could not be recorded in detail.

P-34-002170

P-34-002170 consists of a rusted and eroded metal frame made from I-beams and capped with pipes at one end. The machinery is embedded in a gravel bar. It was likely used for small placer mining operations in the early 20th century.

P-34-004503

P-34-4503 consists of a one-foot diameter metal pipe oriented east to west approximately 500 feet southeast of the American River. Approximately 75 feet of the pipe is exposed. The pipe is located within the American River Placer Mining District and likely is associated with that district.

Cultural Resource Sites

Sites generally consist of multiple artifacts or features and potentially possess the ability to generate data important in prehistory or history. They are more substantial that isolated finds but also represent either a single event or multiple events in a geographically discrete area.

P-34-000232 (CA-SAC-205)

P-34-000232 (CA-SAC-205) consists of a relatively large precontact housepit village measuring approximately 450 feet north-south by 405 feet east-west. In the early 1940s, two Native America burials were reportedly discovered covered at a depth of five feet. Other finds at the site include projectile point fragments, stem points, bone awls, shell beads, bone tools, quartz crystals, and numerous other artifacts. The site is located on a river terrace above the American River; the northernmost tip of the site extends into the Lower Sailor Bar site.

P-34-000335 (CA-SAC-308H)

P-34-000335 (CA-SAC-308H), or the Folsom Mining District Dredge Tailing or American River Placer Mining District, consists of extensive dredge tailings and other associated mining features extending for over 21 miles from the south fork of the American River in the north to Mather Field Road in Rancho Cordova to the south. This resource is identified under several different names and is described as both a site and a district (see below). Portions of the resource have also been given separate identifiers but are recognized as being a part of the site/district.

The California State Historic Preservation Officer (SHPO) previously determined that the project will have an adverse effect on P-34-000335 through utilization of dredge tailing at Sailor Bar; however, mitigation in the form of interpretation of historic properties through a public interactive exhibit, will resolve the adverse effect. This conclusion is described in the IS on pages 29 and 30 of Appendix B.

P-34-000346 (CA-SAC-319)

P-34-000346 (CA-SAC-319) consists of a precontact village site. Excavation during the 1990s found a diverse and large assemblage of artifacts including a variety of flaked and ground stone tool as well as

beads, modified bone, a pendant, and other bone tools. Much evidence of dietary remains were also found. Human remains were also identified. The site is large, measuring 1,350 feet northeast to southwest and 600 feet northwest to southeast. The northwest edge of the site extends into Upper River Bend.

The site boundary as provided by the NCIC indicates the site extends partially into the American River, but the NCIC description of the site states the site is restricted to the river terrace above the river as well as extending south, away from the river, onto the floodplain.

P-34-000496 (CA-SAC-469)

P-34-000496 (CA-SAC-469) consists of a diffuse precontact midden including fire affected rock, shell, shell artifacts, and flaked stone. The site measures approximately 210 feet north to south and 360 feet east to west. Portions of the site's northern boundary extend into El Manto/Sacramento Bar.

The site is located on a high river terrace.

P-34-000497 (CA-SAC-470)

P-34-000497 (CA-SAC-470) is a moderately sized precontact site measuring 225 feet northeast to southwest and 150 feet northwest to southeast. The site contains midden, flaked stone tools, ground stone tools, fire affected rock, and shell. Portions of the site's northeast border extend into Upper River Bend.

The site is located on a river terrace northeast of P-34-000346.

P-34-000498 (CA-SAC-471H)

P-34-000498(CA-SAC-471H) consists of dredge tailing on Sailor Bar. The site is obviously associated with P-34-000335 and was originally going to be mapped as an update to that resource; however, the NCIC decided to file this particular set of dredge tailings separately though a part of Sailor Bar. The site as mapped is very large, measuring over a mile east to west and a third of a mile north to south.

Small sections of the southern portion of the site extend into Upper Sailor Bar and Lower Sailor Bar. The site is associated with the site/district P-34-000335 and any impacts to the site that might occur as a result of the project will be mitigated by treatment of P-34-000335 as described above (See pages 29 and 30 of Appendix B to the IS).

P-34-000506 (CA-SAC-479)

P-34-000506 (CA-SAC-479) consists of a precontact occupation area containing midden, fire affected rock and stone flakes. The site is relatively small, measuring 150 feet north to south and 165 feet east to west. A very small portion of the southern-most tip of the site extends into Upper River Bend.

The site is located on a river terrace.

P-34-002266

P-34002266, also called the Pennsylvania Flat Diggings or Nimbus Fish Hatchery Diggings, is actually a part of site/district P-34-000335 as indicated on the site record provided by the NCIC. The separate identifier may be in use because this site was recorded prior to P-34-000335 being expanded to encompass a large area and number of associated features. The site consists of remnant placer mining

diggings that have been extensively disturbed. The site is long, approximately one and a half miles east to west, but narrow only measuring 312 feet at its widest.

Only a small portion of the site at its western end extends into Lower Sailor Bar. As with other parts of P-34-000335, any impacts that might be incurred as a result of the project have been mitigated by treatment of P-34-000335 as described above (See pages 29 and 30 of Appendix B to the IS).

Cultural Resource Districts

Cultural resource districts are extensive in that they incorporate multiple sites and features. The project intersects with one district.

P-34-000335 (CA-SAC-308H)

P-34-000335 (CA-SAC-308H) the district is much the same as P-34-000335 the cultural resource site; no additional recordation for the district is given by the NCIC as is given for the site. The only notable difference is that the boundary for the district encompasses a much larger area than for the site, including areas that have no features or sites that have yet been identified.

The district encompasses all portions of the Project site except for a large portion of River Bend.

SHPO has previously determined that any adverse effect caused by the project will be mitigated by the proscribed treatment described in a Memorandum of Agreement between SHPO and the Bureau of Reclamation (See pages 29 and 30 of Appendix B to the IS).

Impact Discussion

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 changes to the APE, including the addition of some areas which were not previously evaluated for cultural or tribal cultural resources. However, changes to the APE would result in a net decrease of approximately 92 acres, and the new areas are adjacent the project site and APE addressed in the IS, and were covered in cultural resources records searches. Additional surveys were conducted on January 21 and 24, 2022 and no additional resources or areas with higher sensitivity were identified. The areas which are newly included in the project site and APE are also immediately adjacent the American River and have similar low sensitivity to other portions of the project site with respect to the potential for previously unknown archaeological or Tribal Cultural Resources, or human remains. Access and staging activities would not include ground-disturbing activities that could impact undiscovered archaeological resources, tribal cultural resources, or human remains. Ground-disturbing activities would occur from cut and fill on the project site, however, as stated in the IS, because of the recently deposited material and dynamic environment within the river channel and floodway, including in the area that is proposed to be added to the project site, these areas have extremely low archaeological sensitivity for prehistoric resources and Tribal Cultural Resources.

Although several cultural resources in the vicinity of the Project site were identified for the first time in the updated record search, Project activities, including the Project refinements, are not likely to affect these resources. The cultural resources sites identified include solely areas on the river terrace, at distinctly higher elevation than the areas where Project work would occur, or in isolated locations of bedrock, which would be unaffected by Project work.

SHPO has previously determined that any adverse effect caused by the project will be mitigated by the proscribed treatment described in a Memorandum of Agreement between SHPO and the Bureau of Reclamation (See pages 29 and 30 of Appendix B to the IS).

Therefore, the Project refinements would not result in new significant impacts on cultural resources not already disclosed in the IS. With implementation of Mitigation Measures TCR-1a and TCR-1b, already incorporated into the IS, the impacts to Tribal Cultural Resources would remain less than significant, as disclosed in the IS.

Greenhouse Gas Emissions 3.4

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 generate additional greenhouse gas emissions (GHG) from haul trips due to the transport of gravel and other materials. Design refinements would also reduce GHG emissions because the majority of gravel used at the project sites would be sourced on-site instead of transported from the Mississippi Bar and/or Sailor Bar Borrow Sites, as previously evaluated in the IS. However, some of the sites do not have a balance of material to be removed and placed in the river. For these sites, materials might instead be removed and staged at other sites prior to use, or returned to the Sailor Bar or Mississippi Bar borrow sites or other permitted sites along the LAR. Additional GHG emissions would be generated if additional maintenance activities are needed due to unforeseen events such as an extreme flooding event or excess erosion. The project refinements could result in emissions of up to 750 metric tons of CO₂e in some years. However, even these higher emissions would be less than SMAQMD's established threshold of 1,100 metric tons of CO₂e from construction. 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.

3.5 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. Although Project refinements would include extending the work time frame therefore increasing the length of time for temporary impacts to recreational access and safety of recreationalists due to construction-related traffic, the closures would nevertheless remain temporary, and Mitigation Measure REC-1, "Prepare and Implement a Trail/Traffic Control and Road Maintenance Plan" would be effective in reducing conflicts associated with construction traffic even with the lengthened periods when material handling and hauling could take place. Additionally, temporary project-related closures would not impede recreation access at similar nearby sites. This temporary impact would not increase the impact compared to the analysis in the IS. This impact would remain less than significant after implementation of Mitigation Measure REC-1 and Mitigation Measure REC-2, "Prepare and Implement a Boater Safety Plan."

Transportation 3.6

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 an increase in the number of haul trips than what was originally analyzed in the IS. The annual maximum volume of materials that could be hauled between project sites would be approximately

140,000 cy. However, the maximum amount of haul trips per day would remain the same (59 one-way truck trips). The construction time frame would be extended to 30 weeks to accommodate the additional haul trips without putting extra strain on the transportation network. Additionally, the refined design would allow gravel to be sourced onsite for many of the restoration areas instead of being transported from the Mississippi Bar and/or Sailor Bar Borrow Sites, which would result in a reduction to the number of haul trips originally analyzed. However, some of the sites do not have a balance of material to be removed and placed in the river. For these sites, materials might instead be removed and transported to other sites for later use or returned to the Sailor Bar or Mississippi Bar borrow sites or other permitted sites along the LAR. Therefore, the Project refinements would not increase impacts and would be consistent with the evaluation in the IS. This impact would remain **less than significant.**

4. Conclusions

As described in the preceding sections, the proposed Project refinements consist of a change to the APE due to cut and fill, staging, and interim gravel placement, a change in material handling, and additional maintenance activities.

Based on the analysis in Section 3, "Environmental Analysis," the proposed Project refinements as 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 refinements:

- would not result in any new significant environmental effects,
- would not substantially increase the severity of previously identified significant environmental effects,
- would not result in mitigation measures or alternatives previously found to be infeasible becoming feasible, or
- would not 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 EIR or MND is not required, and this addendum to the MND pursuant to State CEQA Guidelines Section 15164 is the appropriate CEQA document to evaluate the proposed refinements to the Project. The environmental analyses herein of the proposed Project refinements show that impact conclusions remain unchanged from the original IS. Mitigation measures included in the original MND and MMRP remain unchanged and fully apply to the Project refinements as applicable. This Addendum No. 6 is added to the administrative record for the Project.

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