

COASTAL CONSERVANCY

Staff Recommendation

March 24, 2016

ELK RIVER ESTUARY AND TIDAL WETLANDS ENHANCEMENT PLANNING

Project No. 15-033-01

Project Manager: Joel Gerwein

RECOMMENDED ACTION: Authorization to disburse up to \$350,000 to the City of Eureka for tidal wetlands restoration planning and preparation of permit applications in and adjacent to the Elk River Estuary on Humboldt Bay in Humboldt County.

LOCATION: Eureka, Humboldt County

PROGRAM CATEGORY: Integrated Coastal and Marine Resources Protection

EXHIBITS

Exhibit 1: [Project Location](#)

Exhibit 2: [Site photographs](#)

Exhibit 3: [Preliminary conceptual restoration plan](#)

Exhibit 4: [Project Letters](#)

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31220 and 31113 of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes the disbursement of an amount not to exceed three hundred fifty thousand dollars (\$350,000) to the City of Eureka (City) to plan and prepare permit applications for the restoration and enhancement of coastal wetlands at and adjacent to the Elk River Estuary on Humboldt Bay.

This authorization is subject to the following condition:

Prior to disbursement of any funds for the Project, the City shall submit a work plan, schedule, budget, and the names of any contractors or subcontractors to be retained for implementation of the project for the review and approval of the Executive Officer.”

Staff further recommends that the Conservancy adopt the following findings:

“Based on the accompanying staff report and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 5.5 of Division 21 of the Public Resources Code, regarding integrated coastal and marine resources protection projects.
 2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
 3. The project is consistent with the Water Quality Control Plan for the North Coast Region.”
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PROJECT SUMMARY:

Staff recommends the disbursement of up to \$350,000 to the City of Eureka (City) to plan for the enhancement and restoration of coastal wetlands in and adjacent to the Elk River Estuary on Humboldt Bay (Exhibit 1). The goal of this project is to identify restoration and enhancement activities that will improve critical habitat for threatened salmonids and other fish and wildlife, protect Highway 101 and a wastewater transmission line from flooding and storms, sequester carbon to mitigate the impacts of climate change, and expand passive recreational opportunities and coastal access.

Tidal marsh is a threatened habitat type in Humboldt Bay and throughout the United States. Tidal marsh contributes invaluable nutrients to the estuarine ecosystem; provides important habitat for fish, invertebrates, many shorebirds, and other waterbirds; filters out pollutants; and buffers adjacent lands from flood tides and storms. Protection from flooding and storms is becoming more important due to sea level rise. Because of extensive diking, the Humboldt Bay estuary has sustained significant losses of salt marsh, primary productivity, and natural hydrology resulting in changes to sedimentation, deposition, currents, habitat for estuarine plant and animal species, and water quality. The Elk River estuary and adjacent wetlands provide a critical opportunity to regain lost salt marsh around Humboldt Bay, but the estuary is currently severely limited in area and habitat diversity. It has become essentially a 3 mile long, linear diked slough channel with very few tidal wetlands areas. When enhanced, the Elk River estuary and adjacent coastal wetlands could provide approximately 200 acres of critical winter refugia and rearing habitat for threatened coho salmon, chinook salmon, steelhead trout, and coastal cutthroat trout. All four species use the main stem of Elk River and many of its tributaries for adult and juvenile migration, rearing, and spawning. Restored and enhanced wetlands will also provide habitat for the endangered tidewater goby, Dungeness crab and many other species of concern including eelgrass, waterfowl and shorebirds. Enhancement of the estuary will complement enhancement projects currently in the planning stages upstream on both Elk River and Martin Slough.

The 223-acre project area is divided into four units for planning purposes (Exhibits 1 and 2). The City-owned property consists of a 23 acre salt marsh on the north bank of the Elk River (Area 1) and 100 acres of seasonal freshwater wetlands on the south bank of the Elk River (Area 2). Area 3 consists of 54 acres of seasonal freshwater wetlands to the south of the City’s parcels. Approximately 35 acres of Area 3 are owned by a private party and protected by a NRCS wetland conservation easement, and 19 acres are owned by Pacific Gas and Electric (PG&E). Area 4 consists of 26 acres of seasonal freshwater wetlands and brackish marsh located south of King Salmon Avenue. Area 4 consists of several parcels that are owned by the Humboldt Bay

Harbor, Recreation, and Conservation District (HBHRCD), Humboldt County (County), and private parties. An environmental site assessment will be prepared for the entire planning area, identifying opportunities and constraints for wetland restoration and enhancement.

Area 1 has a muted tide cycle due to leaking tide gates. This limits sediment recruitment, preventing the marsh surface from building up with accreted sediment and keeping up with sea level rise. The project will prepare designs for the removal of the dike and tide gates to fully connect Area 1 with Elk River Slough and allow the salt marsh to adapt to sea level rise, as well as the removal of invasive cordgrass (*Spartina densiflora*) which dominates this marsh. The planning process will also explore opportunities to include trails and a kayak launching site at Area 1.

Area 2 is isolated by dikes from Elk River and Humboldt Bay. The project will prepare a plan to breach Area 2's dikes and excavate tidal channels to connect the area to Elk River. Hydrologic modeling will be developed and 30% restoration designs will be prepared for Areas 1 and 2 (Exhibit 3). Permitting work will also be conducted, including the preparation of a document facilitating compliance with the California Environmental Quality Act (CEQA) and draft permit applications to the U.S. Army Corps of Engineers (ACOE), Caltrans, North Coast Railroad Authority (NCRA), City and County, HBHRCD, North Coast Regional Water Quality Control Board (NCRWQCB), California Coastal Commission (CCC), Department of Fish and Wildlife (DFW), National Marine Fisheries Service (NMFS), and United States Fish and Wildlife Service (FWS).

Due to the complexities of multiple property ownerships, at this time conceptual plans will be developed for Areas 3 and 4, which will apprise the landowners of restoration alternatives for their respective ownerships and propose potential restoration phasing based on the constraints of the various landowners. The conceptual restoration plan for Areas 3 and 4 will explore the possibility of altering tidegates and breaching dikes to restore tidal influence from Humboldt Bay and Buhne Slough.

A stakeholder and technical advisory committee will be convened to participate in this effort and provide input on design alternatives. The following agencies and organizations will be invited to participate: Caltrans, the NCRA, NRCS, PG&E, County, HBHRCD, CCC, DFW, NMFS, FWS, ACOE, NCRWQCB, California Trout, private landowners, and the Conservancy.

In addition to identifying opportunities to enhance and restore fish and wildlife habitat, the project will plan for the protection of Highway 101 from sea level rise. The stretch of Highway 101 adjacent to the planning area is lower in elevation than adjacent stretches of highway, and is vulnerable to flooding (Exhibit 1). If current shoreline structures were to be breached, the land adjacent to Highway 101 in the planning area would be inundated by tidewater, Highway 101 would become a causeway (a roadway elevated above a body of water without under-roadway flow), and road embankments would be vulnerable to erosion. The flooding risk will grow more severe as sea level rise progresses. With 0.5 meters of sea level rise, the highway road surface in the planning area will be flooded during the 100 year flood if existing shoreline structures, such as the railroad grade, are breached. With 1.0 meter of sea level rise, 57 percent of the dikes and 64 percent of the railroad grade will be overtopped and the highway road surface in the planning area would be tidally inundated. The project will facilitate a tidal marsh restoration project that would reduce flooding impacts to Highway 101 by increasing flood storage and sediment

transport, and could incorporate additional adaptation measures for the highway, such as improved drainage.

The City is qualified to carry out this project. The City owns a number of coastal wetland areas, and manages them for open space, wildlife habitat, and public access. The City recently implemented tidal marsh enhancement actions for a 40-acre wetland (PALCO Marsh) north of the Bayshore Mall. In addition, the City is in the process of sea level rise adaptation planning as part of its General Plan update, utilizing funding from the California Ocean Protection Council.

Site Description: The Elk River watershed, located in the coastal temperate forest of Humboldt County, California, is the largest freshwater tributary to Humboldt Bay. Restoration of the Elk River watershed is extremely important to coho recovery. The Humboldt Bay coho population is one of the 17 core populations identified in the Southern Oregon Northern California Coast Coho Salmon Evolutionarily Significant Unit Recovery Plan (2012) as most likely to become viable most quickly in response to recovery efforts. This core population is currently at a high risk of extinction, with an estimated rate of population decline exceeding ten percent per year.

The planning area consists of 123 acres of City-owned property on the north and south banks of the Elk River in the Elk River Estuary, and an additional 100 acres located south of and adjacent to the City-owned property, which is owned by private landowners, PG&E, the County, and the HBHRC. These other landowners have expressed interest in a coordinated wetland restoration project for the area (Exhibit 4). The privately owned parcel adjacent to the City's property is protected by an easement acquired and held by NRCS through its Wetland Reserve Program.

The planning area is artificially divided into four separate subareas, based primarily on property ownership (Exhibit 1).

Area 1: The City owns this 23-acre parcel, which has an earthen unfortified dike along Elk River Slough with two top hinged tide gates. The tide gates leak and have created a muted tide cycle supporting salt marsh habitat dominated by invasive *Spartina* and exposed tidal channels. The tidal channels currently do not support Eelgrass. The three sides of this area are occupied by a paved access road and trailhead/commuter parking area and U.S. Highway 101, the City's Hikshari' Trail, and NCRA's railroad grade.

Area 2: The City owns this 100-acre parcel that is currently used to graze livestock. A naturally occurring sand ridge parallel to Elk River Slough, as well as U.S. Highway 101 to the east, and the NCRA railroad to the west, prevent tidal inundation of this low-lying area that ranges in elevation from 3 to 7 feet (NAVD 88). To the south of Area 2 is private property under a wetlands conservation easement held by the NRCS. Vehicular access is from the Highway 101 Humboldt Hill off ramp and Tooby Road. A Humboldt Community Services District forced main sewer line runs parallel to the railroad grade from King Salmon to the Elk River Wastewater Treatment Plant on the north bank of Elk River. The natural drainage pattern in this area has been altered and consists of a series of ditches that convey stormwater to a culvert and tide gate under Highway 101 that drains this property to Elk River.

Area 3: This area is to the south of the City's parcel and is privately owned. Approximately 35 acres are owned by a private party and protected by a NRCS wetland conservation easement. South of this parcel are 19 acres owned by PG&E. The PG&E property continues south to King Salmon Avenue (Exhibit 2). The NRCS property is currently used to graze livestock. This NRCS property is similarly bound by Highway 101 and the NCRA railroad grade. The NRCS property

drains to the City's property to the north. To the south of the NRCS property, PG&E's property is bisected by the NCRA's railroad: the western half is salt marsh that drains to Buhne Slough/King Salmon canal via a tidegate and also by a culvert under King Salmon Avenue draining to the south. This parcel is also bordered on the west by an access road to PG&E's Humboldt Bay Power Plant. The eastern parcel is freshwater wetlands between Highway 101, railroad, and King Salmon Avenue with culverts under the railroad and Highway that connect drainage areas to the east with Buhne Slough as well as a culvert under King Salmon Avenue that drains to the south.

Area 4: This area comprises approximately 26 acres south of King Salmon Avenue, consisting of several parcels that are owned by HBHRCD, the County, and private parties (Exhibit 2). The easternmost property borders Humboldt Bay where the dike has been breached in several locations and is now converting to salt marsh and mud flat habitats. To the west is publicly owned property behind earthen and unfortified dikes that is predominately tidal or freshwater wetlands with a tide gate that drains to the King Salmon Canal and thence to Buhne Slough.

The Elk River Wildlife Sanctuary, owned by the City of Eureka, and the Elk River Wildlife Area, owned by the California Department of Fish and Wildlife, are located adjacent to the planning area at the mouth of the Elk River and together comprise nearly 400 acres.

Project History: The Conservancy has supported restoration and public access in the Elk River watershed over the last ten years. The Conservancy granted \$100,000 to the Redwood Community Action Agency in 2002 to prepare the Martin Slough Enhancement Plan, which was completed in 2005. In 2011, the Conservancy funded the acquisition of a key parcel at the mouth of Martin Slough, a tributary to the Elk River, and also provided a grant to the City to construct the Hikshari' trail along the river where it enters Humboldt Bay. In 2013, the Conservancy granted \$100,000 to California Trout to support an assessment and planning effort focused on the upper watershed. The Conservancy has also supported coastal wetlands restoration projects on Humboldt Bay for many years, including a \$1,450,000 grant to the Humboldt County Resource Conservation District in 2015 to restore tidal marsh in the White Slough Unit of the Humboldt Bay National Wildlife Refuge, located approximately 1.3 miles south of the planning area.

The City of Eureka submitted a Climate Ready Grant proposal to the Conservancy in 2014 to address salt marsh resiliency in Area 1 and expansion and enhancement of the Elk River estuary in Areas 1 and 2; the proposal was not funded. In 2015, the Conservancy and the City facilitated a field meeting of the proposed project with all of the affected property owners/managers to review the restoration opportunities in the overall planning area. The City subsequently submitted a proposal for this project to the Conservancy's first Proposition 1 grant round in September 2015. The project was reviewed in the competitive grant round along with many other projects and ranked highly in the review process. The City requested \$450,000 in its grant proposal, which would have included the development of 100% designs and securing permits for the restoration of Areas 1 and 2. Staff is recommending partial funding to focus on the preliminary planning phases of the project.

PROJECT FINANCING

Coastal Conservancy	\$350,000
Project Total	\$350,000

The anticipated source of funding for this project is the fiscal year 2015 appropriation from the Water Quality, Supply, and Infrastructure Improvement Act of 2014 (Proposition 1, Water Code § 79700 et seq.). Funds appropriated to the Conservancy derive from Chapter 6 (commencing with § 79730) and may be used “for multi-benefit water quality, water supply, and watershed protection and restoration projects for the watersheds of the state” (Section 79731). Section 79732(a) states more specifically that these funds may be used to “implement watershed adaptation projects in order to reduce the impacts of climate change on California’s communities and ecosystems” and to “protect and restore aquatic, wetland, and migratory bird ecosystems.” Consistent with these provisions, the project will plan for the restoration of wetland ecosystems providing habitat for migratory birds and furthering adaptation to climate change for the Humboldt Bay community.

As required by Proposition 1, the proposed project provides multiple benefits. By facilitating restoration of tidal wetlands in the Elk River estuary, the project will benefit depleted native fish populations and other aquatic and avian species that utilize coastal salt marshes. This project will also benefit the resiliency of existing marshes and freshwater wetlands to sea level rise, facilitating the restoration of tidal prism and thereby allowing for sediment accretion within the marsh. The project will also further the region’s sea level rise adaptation planning by exploring opportunities to protect Highway 101 and other built infrastructure in the planning area with a living shoreline approach.

In accordance with Section 79707(b) which requires agencies to prioritize “projects that leverage private, federal, or local funding or produce the greatest public benefit”, this project leverages local in-kind contributions as discussed below.

The project was reviewed and subsequently recommended for funding through a competitive grant process under the Conservancy’s *Proposition 1 Grant Program Guidelines* adopted in June 2015 (“Prop 1 Guidelines”). (See § 79706(a)). The proposed project meets each of the evaluation criteria in the Prop 1 Guidelines as described in further detail in this “Project Financing” section, the “Project Summary” section and in the “Consistency with Conservancy’s Project Selection Criteria & Guidelines” section of this report.

The City of Eureka will provide significant in-kind contributions of staff time, as will the participants in the stakeholder and technical advisory committee. The value of these in-kind contributions is expected to be over \$20,000.

CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:

The proposed project is undertaken pursuant to Chapter 5.5 of Division 21 of the Public Resources Code (Section 31220) and pursuant to Section 31113, as follows:

Pursuant to Section 31220(a) and 31220(b), the Conservancy may undertake projects to protect and restore coastal habitats if the project “protects or restores fish and wildlife habitat within coastal and marine waters and coastal watersheds.” Consistent with this section, the proposed project will facilitate the restoration and enhancement of tidal marshes that provide habitat for fish and wildlife, including listed species, in Humboldt Bay.

The Conservancy has consulted with the State Water Resources Control Board in the development of the project to ensure consistency with Chapter 3 of Division 20.4 of the Public Resources Code regarding water quality. (See Exhibit 3, Project Letters). Section 31220(c) states that “projects funded pursuant to this section shall include a monitoring and evaluation component.” The proposed project involves only planning and not implementation. Therefore, a monitoring and evaluation component is not appropriate, but designs completed as part of the project will facilitate monitoring and evaluation of the restoration by establishing restoration goals and objectives. The proposed project is consistent with applicable and relevant Integrated Regional Water Management programs, local watershed management plans, and water quality control plans adopted by the state or regional water quality control boards, as discussed in the “Required Criteria” and “Consistency with Local Watershed Management Plan/State Water Quality Plan” sections below.

This project is also consistent with Section 31113, which provides that “the Conservancy may undertake projects within its jurisdiction, including, but not limited to, those that reduce greenhouse gas emissions, address extreme weather events, sea level rise, storm surge, beach and bluff erosion, salt water intrusion, flooding and other coastal hazards that threaten coastal communities, infrastructure and natural resources.” This project would facilitate protection for coastal wetlands in the planning area by allowing for sediment accretion, and facilitate protection for the stretch of Highway 101 adjacent to the planning area from erosion, sea level rise and storm surge impacts.

**CONSISTENCY WITH CONSERVANCY’S 2013 STRATEGIC PLAN
GOAL(S) & OBJECTIVE(S), AS REVISED JUNE 25, 2015:**

Consistent with **Goal 5, Objective A** of the Conservancy’s 2013-2018 Strategic Plan, the proposed project will develop a plan for the restoration and enhancement of coastal habitats, including coastal wetlands and intertidal areas.

Consistent with **Goal 7, Objective 7B** of the Conservancy’s 2013-2018 Strategic Plan, the proposed project would develop an adaptation plan to address threats from sea level rise and extreme storm events to public infrastructure while protecting natural resources and maximizing public benefits.

**CONSISTENCY WITH CONSERVANCY’S
PROJECT SELECTION CRITERIA & GUIDELINES:**

The proposed project is consistent with the Conservancy’s Project Selection Criteria and Guidelines, last updated on October 2, 2014, in the following respects:

Required Criteria

1. **Promotion of the Conservancy’s statutory programs and purposes:** See the “Consistency with Conservancy’s Enabling Legislation” section above.
2. **Consistency with purposes of the funding source:** See the “Project Financing” section above.
3. **Promotion and implementation of state plans and policies:** The Project will help implement two priority actions identified in the 2014 *California Water Action Plan* (CWAP):

Action 4: Protect and Restore Important Ecosystems. The Project will implement this action by restoring tidal marsh in an estuary that provides valuable fish and wildlife habitat.

Action 8: Increase Flood Protection. The CWAP calls for action to address flooding threats due to aging levee infrastructure and sea level rise due to climate change. The Project will implement this action by restoring tidal marsh in an area currently protected by severely eroded dikes, providing protection for a vulnerable stretch of Highway 101 from flooding and storm damage that will increase with sea level rise.

The Project will implement a Management Measure identified in the *California Nonpoint Source Pollution Control Program* prepared by the State Water Resources Control Board in 2000: MM6B- Restoration of Wetlands and Riparian Areas. The Project will further the following statewide goals and conservation strategies of the *California Wildlife Action Plan* (Wildlife Plan), prepared by the California Department of Fish and Wildlife in 2015:

Goal 3.3 (Hydrological Regime): Maintain or improve hydrological regimes vital for sustaining ecosystems (including riverine, lacustrine, and estuarine hydrodynamics). (pg. 4-3)

The Project will help implement the following conservation strategies identified by the Wildlife Plan for anadromous salmonids in coastal estuaries on the North Coast:

Restore and enhance estuary habitat, connectivity, and ecological processes essential for anadromous species; and

Establish estuary function and structure that will allow anadromous migration and be responsive to climate change. (pg. 6-19)

The Project will help implement the following tasks identified in the *Recovery Strategy for California Coho Salmon*, prepared by CDFW in 2004:

- Eureka Plain Task 2: Work with agencies and landowners, to re-establish estuarine function.
- Eureka Plain Task 10: In cooperation with willing landowners, restore and maintain historical tidal areas, backwater channels and salt marsh.
- Rangewide-Estuaries Task 2: Restore estuarine and associated wetland ecosystems.

4. **Support of the public:** The project enjoys broad public support, as was evinced at an initial planning meeting on May 12, 2015, attended by the HBHRC, NCRWQCB, USFWS, PG&E, NRCS, Caltrans, CDFW, the County, CalTrout, Humboldt Baykeeper, and the NOAA Restoration Center. See Exhibit 4 for Project Letters.
5. **Location:** The proposed project would be located within the coastal zone of the City of Eureka and Humboldt County.
6. **Need:** Without Conservancy funding, this planning effort would not occur.
7. **Greater-than-local interest:** The proposed project will lead to the restoration of tidal marsh in Humboldt Bay, which provides plant and wildlife habitat of regional and statewide importance for resident and migratory species.

8. **Sea level rise vulnerability:** Project planning will incorporate sea level rise modeling for Humboldt Bay conducted as part of the 2015 Humboldt Bay Sea Level Rise Adaptation Plan, funded by the Conservancy. The project will prepare a restoration design that will increase resiliency to sea level rise by allowing tidal marshes to accrete sediment to keep pace with sea level rise, and by providing protection for Highway 101 and an important wastewater transmission line from inundation.

Additional Criteria

9. **Urgency:** Restoration of the project area is urgent because some of the dikes protecting the planning area are at high risk of failure. If sections of the dike fail, restoration of tidal prism could occur in a way that would be problematic making the project more costly or infeasible.
10. **Resolution of more than one issue:** The project would facilitate the restoration of valuable fish and wildlife habitat and the protection of Highway 101 and other infrastructure from sea level rise.
11. **Leverage:** See the “Project Financing” section above.
12. **Innovation:** The project will employ nature based solutions to create living shorelines as protective features whenever ever feasible rather than standard shoreline fortification practices.
13. **Readiness:** The city and its partners held an initial reconnaissance meeting in May 2015 and are ready to begin the planning process as soon as funds are available.
14. **Realization of prior Conservancy goals:** “See “Project History” above.”
15. **Return to Conservancy:** See the “Project Financing” section above.
16. **Cooperation:** The project will convene a stakeholder and technical advisory group including private landowners, non-profits, and local, state, and federal agencies.
17. **Minimization of greenhouse gas emissions:** Project design will include measures to avoid or minimize greenhouse gas emissions to the extent feasible and consistent with the project objectives.

CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:

The planning area is divided between the City’s Local Coastal Program (LCP) area, and the County’s LCP area. The Humboldt Bay Area Plan (HBAP) of the Humboldt County LCP, certified by the California Coastal Commission in 1982, supports planning to protect and enhance environmentally sensitive habitats, such as coastal marshes and dunes. The HBAP cites Public Resources Code Section 30240(a), a provision of the California Coastal Act, which states that “environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values” (HBAP Section 3.30, p. 38). In addition, the HBAP stresses the tremendous value of salt marsh, brackish marsh, dunes, and other natural habitats for fish and wildlife in Humboldt Bay (HBAP, Section 3.30(A), pp.39-40). The project will result in the restoration of coastal wetlands in Humboldt Bay. Therefore, the project is entirely consistent with the policies of the HBAP of the Humboldt County LCP, as discussed above.

The City's 1997 General Plan Policy Document ("GPPD"), which was certified by the Coastal Commission as an update to the City's LCP in 1999, states that the City "shall maintain and, where feasible, restore biological productivity and the quality of coastal waters, streams, wetlands, and estuaries..." (GPPD Section 6.A.1, pg. B-14). Restoration and enhancement of coastal wetlands in the planning area is consistent with the policy cited above.

**CONSISTENCY WITH LOCAL WATERSHED MANAGEMENT PLAN/
STATE WATER QUALITY CONTROL PLAN:**

The project is consistent with, and furthers the goals of, the *Humboldt Bay Management Plan* (HBMP), prepared in May 2007 by the Harbor District. The HBMP expresses support for the goals of the proposed project in the following statement:

Salt marshes in the Bay have been reduced substantially in area with respect to their pre-settlement extent, and they continue to be lost. In addition, the extant salt marshes are degraded by the dominant presence of dense-flowered cordgrass. The benefits of shoreline-protecting salt marshes for stabilizing sediment and protecting shoreline structures from wave impacts combine with a conservation focus on maintaining or restoring salt marshes to make the restoration or enhancement of salt marshes an important concern for the District. (HBMP, p.129)

The proposed project is consistent with Objective CAS-3: "Maintain and enhance habitat for sensitive species" (HBMP, p.204), in that it will lead to the restoration of habitat for Point Reyes bird's beak and Humboldt Bay Owls Clover, both listed as endangered by the California Native Plant Society.

The project is consistent with, and furthers the goals of, the Humboldt Bay Watershed Salmon and Steelhead Conservation (HBSSC) Plan, prepared by the Humboldt Bay Watershed Advisory Committee in March 2005. The HBSSC Plan highlights the importance of the Bay's tidal marshlands in supporting salmon populations, as well as diverse communities of fish and wildlife (p.11). The HBSSC Plan notes that estuarine habitat is necessary for the survival of salmon and that this habitat "has been significantly reduced by construction of levees and tidegates, and placement of fill" (HBSSC Plan, p.viii). One of the stated goals of the HBSSC Plan is to "Maintain and restore estuary processes that benefit salmonids" (HBSSC Plan, p.ix). The proposed project would further this goal by facilitating restoration of tidal marshes, as discussed above in the "Project Summary" section.

The proposed project is consistent with the Water Quality Control Plan for the North Coast (adopted by the Regional Water Quality Control Board North Coast Region in 1988 and last updated in 2007) in that it will enhance wildlife habitat, habitat for rare, threatened and endangered species, and estuarine habitat in Humboldt Bay. The Water Quality Control Plan for the North Coast designates wildlife habitat, rare, threatened, and endangered species habitat, and estuarine habitat as beneficial uses of Humboldt Bay (Water Quality Control Plan for the North Coast, Table 2-1, pp. 2-8 to 2-12).

COMPLIANCE WITH CEQA:

The proposed project is statutorily exempt from the California Environmental Quality Act (CEQA), pursuant to 14 California Code of Regulations Section 15262. Consistent with Section

15262, the project will only involve preparation of planning documents, and will consider environmental factors. Upon approval, staff will file a Notice of Exemption for this project.