Memorandum

4 March 2024

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Copy to	Greg Felter, GHD	**Email**	ccox.rcsd@gmail.com
From	Chryss Meier and Sam Moose, GHD	**Project No.**	12619090
Subject	Redway Emergency Water Storage and Supply Project – Review for CEQA Exemption		

1. Introduction

GHD has performed a California Environmental Quality Act (CEQA) compliance review for the Redway Emergency Water Storage and Supply Project (Project). This memorandum provides a brief description of the Project, summarizes the CEQA exemptions that the Project qualifies for, and reports the findings of supporting documentation.

2. Project Background and Description

2.1 Project Background

The Redway Community Services District (District) is proposing the Project, which aims to improve the resilience of the District's water system, particularly as it relates to maintaining service during droughts. The District has been severely impacted by recent droughts in California, which threaten its ability to provide adequate service to customers. The District manages a water treatment plant (WTP) and water distribution system, including pipelines, tanks, pump stations and meters. Many of the assets have reached the end of their useful life and are in need of repair and improvement.

2.2 Project Description

This Project includes three components, which consist of:

Filter Media Replacement at the District's WTP located at 546 Barnes Lane, Redway 95542 (APNs 077-351-001 and 077-351-011).

Water Meter Replacement with new Smart Meters throughout the Redway community.

Rusk Tank Site Improvements located at APN 077-331-014-000. There are three improvement options for the Rusk Tank site, including: Option A, Lowering the operating level and rehabilitating the existing water storage tank; Option B, Retrofitting the existing water storage tank; or, Option C, Replacement of the water storage tank with a new tank.

These Project components are discussed in more detail below. For reference to Project locations, please see Figure 1 Vicinity Map, Figure 2a Rusk Tank Site Aerial, and Figure 2b Water Treatment Site Aerial.

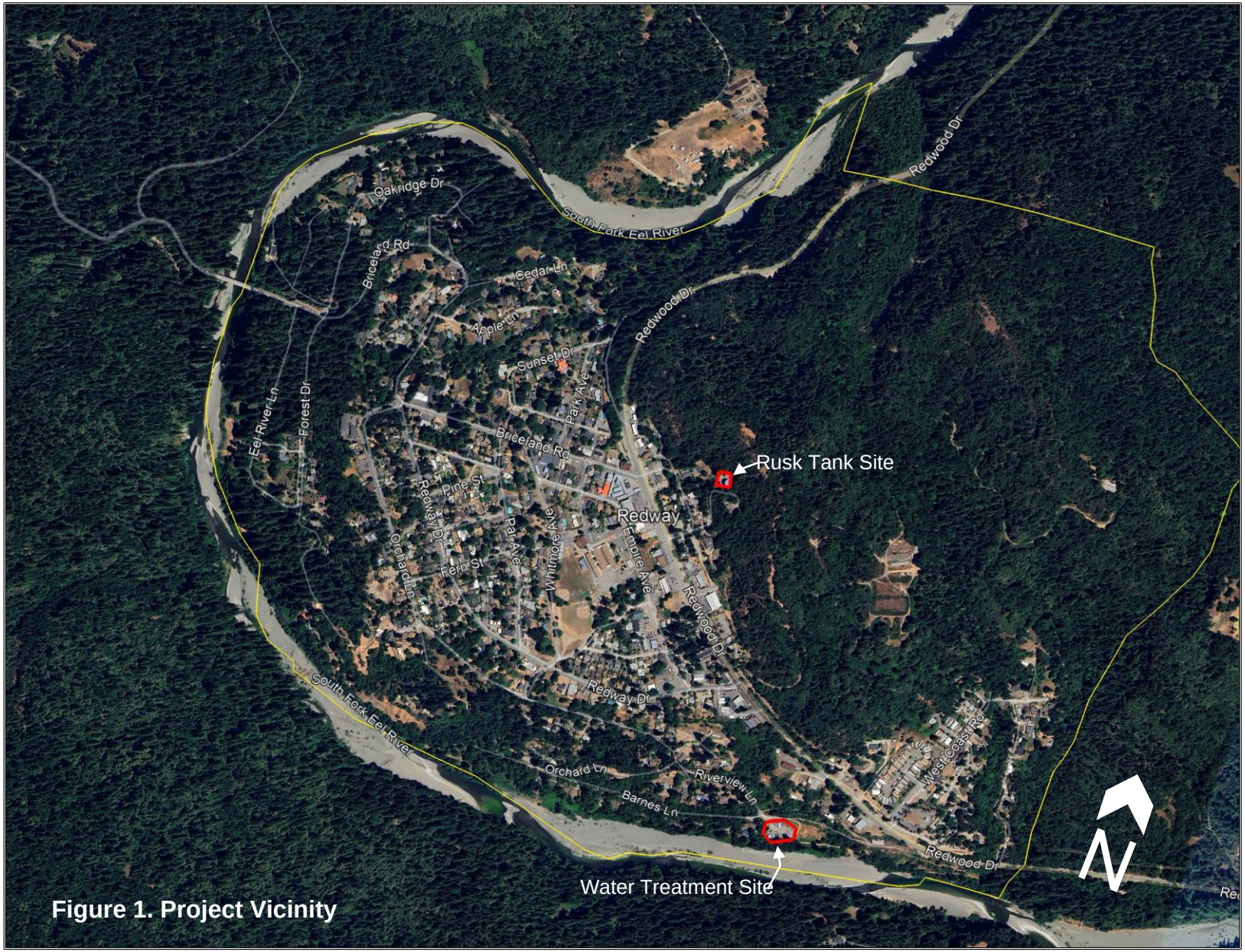

Figure 1. Project Vicinity

Figure 2a. Rusk Tank Site Aerial

Figure 2b. Water Treatment Site Aerial

2.2.1 Filter Media Replacement

There are currently four (4) 10.5-foot vertical filters at the District's WTP. Each filter contains approximately 325 cubic feet of media consisting of gravel, sand, and anthracite. The District and ERS Industrial Services, Inc. completed a condition assessment of the existing filters. Per the assessment, the media is spent, and new media needs to be installed. Interior and exterior coatings need to be replaced, and flow to the filters needs to be improved to achieve more uniform distribution across the filters.

The Project would remove the existing media, recoat the existing filters, and install replacement filter media within the filters. Existing filter media would be removed and disposed of off-site. The filter interior and exterior would be cleaned and recoated. The total media volume of approximately 1,300 cubic feet, or 48 cubic yards, would require approximately 3 truck loads for disposal (assuming 16 cubic yards per truck).

New weirs would be constructed to achieve more uniform filter loading and replace the existing troughs. To accomplish this, new stainless-steel connections would be welded to the filter interior walls and new weirs would be installed on the connections. The new filter media would be the same volume as the existing media. Filter media replacement would be performed using hand tools as well as some heavy equipment, potentially including, but not limited to, an excavator, loader, and dump truck.

After replacement of the media, operations and maintenance of the filters would be substantively similar to existing operation and maintenance activities. No new staff or materially different operational activities would be required.

2.2.2 Water Meter Replacements

Manual read water meters are currently in-use in the District's service area. The Project includes replacement of the existing meters with new Smart Meters. The District has purchased 750 Smart Meters from MetronFarnier. These meters connect to cellular service provided by Verizon to transmit data to the District. Installation of Smart Meters would reduce the labor burden on the operations staff in obtaining meter readings from their existing manual read meters and would also help to identify leakage earlier and improve efficiency throughout the service area. Therefore, the Project is anticipated to reduce on-road vehicle travel associated with water meter reading, as well as reduce the volume of water leakage in the system.

The District has already replaced several existing meters with Smart Meters throughout the system and plan to continue this effort throughout the service area. Under the Project, water meter replacement would continue to occur at existing meter sites throughout the community.

2.2.3 Rusk Tank Site Improvements

The current Rusk Tank site contains two water storage tanks – a 250,000-gallon tank (built in 1968), and a 460,000-gallon tank (built in 2012). The two tanks currently operate such that the water level is the same in both tanks. The 1968 tank is approximately 32-feet tall and is shorter than the 2012 tank; therefore, the storage capacity of the 2012 tank is limited by the operating height of the smaller, 1968 tank. The Rusk Tank site improvements would include actions to either retrofit or replace the existing 1968 tank in order to improve the overall storage capacity of the site.

A 2021 Conditions Assessment of the Rusk Tank Site was prepared by Liquid Engineering Corporation (LEC). The LEC Conditions Assessment and the DWR Grant Scope identify

recommended modifications such as the installation of improvements to the foundation and anchorage.

As described in Section 2.2, there are three options for improving the storage tanks at the Rusk Tank site: Option A, Lowering the operating level and rehabilitating the existing water storage tank; Option B, Retrofitting the existing water storage tank; or, Option C, Replacement of the water storage tank with a new tank. Under all three options, new overflow piping, gate valve, and check valve would be provided to connect the tank overflow to the existing drain pipeline. New interior and exterior access ladders would also be provided as well as a solar mixing system as indicated on the Department of Water Resources (DWR) Grant Estimate. Under Option A and Option B, the tank would also be recoated.

Regardless of option selected, operation and maintenance of the 250,000-gallon tank would be substantively similar to existing operation and maintenance activities. No new staff or materially different operational activities would be required.

Option A: Lower Operating Level and Rehabilitate 1968 Rusk Tank

This option would include the lowering of the operational water level in the tank by approximately 6.5 feet and the installation of an altitude valve and pressure transducer to regulate the water level. This option includes installation of improvements to the foundation and anchorage. These retrofits would allow the existing tank to continue operation while providing adequate support against wind, seismic, and internal sloshing forces.

Option A includes all other improvements called for in the LEC Conditions Assessment and the DWR Grant Scope and includes additional recommended modifications such as the installation of improvements to the foundation and anchorage. These improvements include: (1) Clearing any dirt, debris, and other loose gravel away from the tank foundation down to a minimum 6” below top of foundation; (2) repairing any cracks and spalling in the foundation’s concrete; and (3) sealing the foundation with a sealant. Option A would also include cleaning all ponding areas on top of the tank using hand tools, and applying a commercial epoxy adhesive filler, as needed, to prevent ponding of water. The interior of the tank would be sandblasted, seams would be sealed, and an epoxy primer and epoxy liner would be applied. A passive cathodic protection system would be installed.

The exterior of the tank would be pressure washed to remove loose rust, and scale would be removed with wire burses and hand scrapers. The exterior of the tank would be spot primed and finished with coat of acrylic paint.

Option B: Retrofit Existing 1968 Rusk Tank

One of the two following alternatives for retrofitting the existing 1968 Rusk Tank would occur if Option B is selected:

> **B.1 Replace the Tank Roof.** This alternative includes the replacement of the existing roof with a new steel roof capable of withstanding sloshing forces.
>
> **B.2 Extend Tank Shell Height.** This alternative includes the installation of additional welded side wall section(s) to heighten the tank and allow for freeboard in addition to the installation of a new roof.

Both alternatives would allow for a consistent water level between the two tanks at the site. Option B includes all other improvements called for in the LEC Conditions Assessment and the DWR Grant Scope, and includes additional recommended modifications such as the installation of improvements to the foundation and anchorage. These improvements include: (1) Clearing any dirt, debris, and other loose gravel away from the tank foundation down to a minimum 6” below

top of foundation; (2) repairing any cracks and spalling in the foundation's concrete; and (3) sealing the foundation with a sealant. Option A would also include cleaning all ponding areas on top of the tank using hand tools, and applying a commercial epoxy adhesive filler, as needed, to prevent ponding of water. The interior of the tank would be sandblasted, seams would be sealed, and an epoxy primer and epoxy liner would be applied. A passive cathodic protection system would be installed.

The exterior of the tank would be pressure washed to removing loose rust, and scale would be removed with wire burses and hand scrapers. The exterior of the tank would be spot primed and finished with coat of acrylic paint.

These retrofits, as with Option A, would allow the existing tank to continue operation at the current water level while providing adequate support against wind, seismic, and internal sloshing forces.

Option C: Replacement of Tank

This option includes the replacement of the existing Rusk Tank entirely with a new fusion bonded epoxy coated steel bolted storage tank. The replacement tank would have a usable volume of approximately 250,000 gallons. Therefore, the replacement tank would have no increase in capacity as compared to the existing 250,000 gallon tank. The replacement tank would allow for additional freeboard and a consistent operating level between the replacement tank and adjacent 460,000-gallon tank. This option would require demolition and removal of the existing tank and foundation, and installation of a new foundation prior to installation of the replacement tank.

Project Construction and Demolition Timeline

Construction Duration and Hours

Both the filter media and Rusk Tank improvements are planned to begin in summer/fall 2024 and last approximately six months. The meter replacement portion of the Project would begin in early 2024 and last approximately six months. Construction work hours for RCSD are generally limited to 7:30 a.m. to 4:00 p.m.

Construction Equipment

A variety of equipment would be used to construct the Rusk Tank and Filter portion of the Project. This could include, but would not be limited to, an excavator, backhoe, loader, pile driver and dump truck.

For the meter component of the Project, it is anticipated that work would be completed with hand tools and small power tools.

Construction Staging Area and Access

Staging for the tank portion of the Project would occur on the developed portion of that parcel or on the adjacent Rusk Lane. Staging for the filter media component of the Project would be in a developed portion of the WTP site. No staging is anticipated to be required for the meter component of the Project, but meters may be temporarily stored at the WTP site prior to installation.

3. Review for CEQA Exemption

The Project was reviewed for possible application of CEQA Categorical Exemptions and CEQA Statutory Exemptions. Categorical Exemptions review is provided in Section 3.1. Statutory Exemptions review is provided in Section 3.2.

3.1 Categorical Exemptions

The Project was reviewed relative to the CEQA Guidelines to determine if it qualifies under one or more classes of projects that have been determined not to have a significant effect on the environment and which may be exempted. Based on the review, the Project meets the criteria for the following categorical exemptions:

CEQA Guidelines Section 15301: Existing Facilities

The Class 1 categorical exemption covers the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use.

CEQA Guidelines Section 15302: Replacement or Reconstruction

Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

The Project meets the criteria for the above-listed categorical exemptions as the Project constitutes the repair, maintenance, and potential replacement of existing utility structures with negligible or no expansion of capacity. For the Rusk Tank Site component, Option C (Replacement of Tank) is used for purposes of a conservative (worst-case) environmental review.

CEQA Guidelines Section 15300.2 Exceptions

Section 15300.2 of the CEQA Guidelines includes a list of circumstances in which a Categorical Exemption cannot be used, including the following:

a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where a project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, Classes 3, 4, 5, 6, and 11 are considered to apply in all instances, except where a project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

b) Cumulative Impact. All Classes of exemptions are inapplicable when the cumulative impact of successive projects of the same type in the same place over time is significant.

c) Significant Effect. The CEQA Guidelines state that a Categorical Exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

d) Scenic Highways. The CEQA Guidelines state that a Categorical Exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.

e) Hazardous Waste Sites. The CEQA Guidelines state that a Categorical Exemption shall not be used for a project located on a hazardous waste site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

f) Historical Resources. The CEQA Guidelines state that a Categorical Exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

As part of this review, GHD evaluated the Project against each of the applicable exceptions, summarized below.

Exception 15300.2 (a) - Location

CEQA Guidelines Section 15300.2(a) specifies that Classes 3, 4, 5, 6, and 11 categorical exemptions are qualified by consideration of where a project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where a project may affect an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies. This Project qualifies as a Class 1 and Class 2 exemption, which are not qualified by consideration of where a project is to be located.

Exception 15300.2 (b) - Cumulative Impact

CEQA Guidelines Section 15300.2(b) specifies that a categorical exemption shall not be used when the cumulative impact of successive projects of the same type in the same place over time is significant. Cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines Section 15355). Other anticipated actions by the District include:

- Development of 3 new wells (including exploratory well drilling) and solar pumping equipment. Wells will be drilled below the grade of the South Fork Eel River (i.e. not upslope of springs that may provide critical cold water surface flows)
- Replacement of an existing 100,000 gallon water tank with new 400,000 gallon water tank, including upgrades to foundation
- Installation of new 500,000 gallon storage tank at the CSD’s water treatment plant, including a new foundation

The exact construction schedules for cumulative projects are not currently known. However, construction it is not anticipated to overlap with the proposed Project. In addition, the footprint of the cumulative projects would either be within existing District facilities (tank cumulative projects) or be nominal (new well cumulative projects). Given the dissimilarity between the Project and the cumulative projects as to construction timing, and the limited scope of both the Project and cumulative projects, the Project is not anticipated to create a significant cumulative impact on an environmental resource. Therefore, the cumulative impact exception under CEQA Guidelines Section 15300.2(b) does not apply to the Project.

Exception 15300.2 (c) - Significant Effect from Unusual Circumstances

CEQA Guidelines Section 15300.2(c) specifies that a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. The Project is consistent with exempt classes of projects as it constitutes restoration, repair, maintenance, or replacement of an existing facility and structures within the same site, involves nominal expansion of existing or former use, and will have the same purpose as the existing infrastructure for those facilities being repaired. The Project would not include a feature that distinguishes it from others in the exempt classes, such as size or location. Based on the review, no unusual circumstances have been identified and the Section 15300.2(c) exception is not applicable to the Project.

Exception 15300.2 (d) - Scenic Highways

CEQA Guidelines Section 15300.2(d) specifies that a categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State scenic highway. There are no State-designated scenic highways adjacent to or in view of the site (Caltrans 2023). Therefore, the scenic highways exception under CEQA Guidelines Section 15300.2(d) is not applicable to the Project.

Exception 15300.2 (e) - Hazardous Waste Sites

CEQA Guidelines Section 15300.2(e) specifies that a categorical exemption shall not be used for a project located on a site which is included on a list compiled pursuant to Section 65962.5 of the Government Code. To determine if any portion of the Project would be located on such a list, GHD reviewed the online data resources that provide information on facilities or sites pursuant to Section 65962.5, as well as relevant reports to any listed hazardous waste sites (CalEPA 2023). These include:

- Department of Toxic Substances Control EnviroStor database;
- List of Leaking Underground Storage Tank Sites from the Water Board GeoTracker database;
- List of solid waste disposal sites identified by the Water Board with waste constituents above hazardous waste levels;
- List of “active” Cease and Desist Orders and Cleanup and Abatement Orders from the Water Board; and
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.

The Rusk Tank site and WTP are not located on a list compiled pursuant to Section 65962.5 of the Government Code, and no adjacent sites were identified where contamination may have extended onto the property. Within the District’s service area, there are 5 leaking underground storage tank (LUST) sites identified on the GeoTracker Database; however, all 5 LUST sites are identified as “Completed – Case Closed”. Additionally, the 750 water meter installation locations would involve no ground disturbance. Therefore, water meter replacements would not occur at a hazardous waste site and would not disturb known contaminated soils. Based on the review and the findings summarized above, the Section 15300.2(e) exception does not apply to the Project.

Exception 15300.2 (f) - Historical Resource

CEQA Guidelines Section 15300.2(f) specifies that a categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource. The CEQA Guidelines define a historical resource as: (1) a resource listed in the California Register of Historical Resources; (2) a resource included in a local register of historical resources, as defined in the California Public Resources Code (PRC) Section 5020.1(k), or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (3) any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational,

social, political, military, or cultural annals of California, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

On December 19th, 2023, a search of records, reports, and maps at the Northwest Information Center (NWIC) was conducted and found no recorded archaeological recorded resources at he the Project site. The State Office of Historic Preservation Built Environment Resources Directory (OHP BERD), which includes listings of the California Register of Historical Resources, California State Historical Landmarks, California State Points of Historical Interest, and the National Register of Historic Places, lists no recorded buildings or structures within or adjacent to the proposed Project area. In addition to these inventories, the NWIC base maps show no recorded buildings or structures within the Project area.

Therefore, no adverse change would occur to this resource. Based on the review, the Section 15300.2(f) exception does not apply to the Project.

3.2 Statutory Exemption

The Project may qualify for a statutory exemption under CEQA Statute Section 21080.47. Statute subdivision 21080.47(a)(4)(A) identifies the types of projects exempt by the statute as projects consisting solely of the installation, repair, or reconstruction of one or more of the following:

(i) Drinking water groundwater wells with a maximum flow rate of up to 250 gallons per minute.

(ii) Drinking water treatment facilities with a footprint of less than 2,500 square feet that are not located in an environmentally sensitive area.

(iii) Drinking water storage tanks with a capacity of up to 250,000 gallons.

(iv) Booster pumps and hydropneumatic tanks.

(v) Pipelines of less than one mile in length in a road right-of-way or up to seven miles in length in a road right-of-way when the project is required to address threatened or current drinking water violations.

(vi) Water service lines.

(vii) Minor drinking water system appurtenances, including, but not limited to, system and service meters, fire hydrants, water quality sampling stations, valves, air releases and vacuum break valves, emergency generators, backflow prevention devices, and appurtenance enclosures.

The Project meets the above listed criteria, as it consists solely of the installation, repair, or reconstruction of the following components:

Filter Media Replacement: Drinking water treatment facility with a footprint of less than 2,500 square feet that are not located in an environmentally sensitive area.

Water Meter Replacement: Minor drinking water system appurtenances consisting of system and service meters, and appurtenance enclosures.

Rusk Tank Site Improvements: Drinking water storage tanks with a capacity of up to 250,000 gallons.

CEQA Statute subsection 21080.47(b) provides that CEQA does not apply to a project that meets the requirements of subdivision 21080.47(c) and subdivision 21080.47(d) or (e), as appropriate,

and that primarily benefits a small disadvantaged community water system or a state small water system in any of the following ways:

(A) Improving the small disadvantaged community water system's or state small water system's water quality, water supply, or water supply reliability.

(B) Encouraging water conservation.

(C) Providing drinking water service to existing residences within a disadvantaged community, a small disadvantaged community water system, or a state small water system where there is evidence that the water exceeds maximum contaminant levels for primary or secondary drinking water standards or where the drinking water well is no longer able to produce an adequate supply of safe drinking water.

The California Department of Water Resources (DWR) developed a web-based mapping application to help identified Disadvantaged Communities (DAC). Per the DWR's DAC Mapping Tool, the District's service area is within an identified Disadvantaged Community (DWR 2024). A review of the Statute's specified environmental conditions (Statute subsection 21080.47(c)) is provided below. A review of the District's the contracting and/or labor agreement conditions (Statute subsection 21080.47(d)) is not included in this document.

CEQA Statute 21080.47(c) Environmental Criteria

Section 21080.47 of the CEQA Statutes includes a list of environmental criteria which a project must meet in order to qualify for the exemption. As stated in Section 21080.47(c), the project must meet all of the following:

(1) Does not affect wetlands or sensitive habitats.

(2) Unusual circumstances do not exist that would cause a significant effect on the environment.

(3) Is not located on a hazardous waste site that is include on any list compiled pursuant to Section 65962.5 of the Government Code.

(4) Does not have the potential to cause a substantial adverse change in the significance of a historical resource.

(5) The construction impacts are fully mitigated consistent with applicable law.

(6) The cumulative impact of successive reasonably anticipated projects of the same type as the project, in the same place, over time, is not significant.

As part of this review, GHD evaluated the Project against each of the criteria, summarized below.

Criteria 21080.47(c)(1) – Wetlands or Sensitive Habitats

The Project is located entirely within the grounds of the existing Rusk Lane tank site, existing WTP, and existing water meter access boxes throughout the District. No areas, such as critical habitat pursuant to the federal Endangered Species Act, are known to occur at the Project site. The California Natural Diversity Database does habitat for the American peregrine falcon and Steelhead, and sitings of Western Pond Turtle, Western bumblebee, North American porcupine, and foothill yellow-legged frog, these sitings are non-specific. All work would occur within developed sites, and therefore would not qualify as suitable habitat for these species. The Project component locations do not include sensitive natural communities, such as riparian, wetlands, or woodlands. Based on the review, the Project meets this criterion.

Criteria 21080.47(c)(2) – Significant Effect from Unusual Circumstances

The Project consists of restoration, repair, maintenance, or replacement of an existing facility and structures within the same site, involves no or nominal expansion of existing or former use, and will have the same purpose as the existing infrastructure for those facilities being repaired. The Project would not include a feature that distinguishes it from others in the exempt classes, such as size or location. Based on the review, no unusual circumstances have been identified. The Project meets this criterion.

Criteria 21080.47(c)(3) – Hazardous Waste Sites

To determine if any portion of the Project would be located on a list compiled pursuant to Section 65962.5 of the Government Code, GHD reviewed the online data resources that provide information on facilities or sites pursuant to Section 65962.5, as well as relevant reports to any listed hazardous waste sites (CalEPA 2023). These include:

- Department of Toxic Substances Control EnviroStor database;
- List of Leaking Underground Storage Tank Sites from the Water Board GeoTracker database;
- List of solid waste disposal sites identified by the Water Board with waste constituents above hazardous waste levels;
- List of “active” Cease and Desist Orders and Cleanup and Abatement Orders from the Water Board; and
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.

The Rusk Tank site and WTP are not located on a list compiled pursuant to Section 65962.5 of the Government Code, and no adjacent sites were identified where contamination may have extended onto the property. Within the District’s service area, there are 5 leaking underground storage tank (LUST) sites identified on the GeoTracker Database; however, all 5 LUST sites are identified as “Completed – Case Closed”. Additionally, the 750 water meter installation locations would involve no ground disturbance. Therefore, water meter replacements would not occur at a hazardous waste site and would not disturb known contaminated soils. The Project meets this criterion.

Criteria 21080.47(c)(4) – Historical Resources

The CEQA Guidelines define a historical resource as: (1) a resource listed in the California Register of Historical Resources; (2) a resource included in a local register of historical resources, as defined in the California Public Resources Code (PRC) Section 5020.1(k), or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (3) any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency’s determination is supported by substantial evidence in light of the whole record.

On December 19th, 2023, a search of records, reports, and maps at the Northwest Information Center (NWIC) was conducted and found no recorded archaeological recorded resources at he the Project site. The State Office of Historic Preservation Built Environment Resources Directory (OHP BERD), which includes listings of the California Register of Historical Resources, California State Historical Landmarks, California State

Points of Historical Interest, and the National Register of Historic Places, lists no recorded buildings or structures within or adjacent to the proposed Project area. In addition to these inventories, the NWIC base maps show no recorded buildings or structures within the Project area.

Therefore, no adverse change would occur to historical resources. The Project meets this criterion.

Criteria 21080.47(c)(5) – Construction Impacts

The Project would implement, as standard construction procedures, Best Management Practices to control erosion, sedimentation, and runoff. The Project construction footprint would be within existing developed areas. Construction impacts would be minimal, and additional mitigation actions are not required.

Criteria 21080.47(c)(6) – Cumulative Impacts

Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355). Other anticipated actions by the District include:

- Development of 3 new wells (including exploratory well drilling) and solar pumping equipment. Wells will be drilled below the grade of the South Fork Eel River (i.e. not upslope of springs that may provide critical cold water surface flows)
- Replacement of an existing 100,000 gallon water tank with new 400,000 gallon water tank, including upgrades to foundation
- Installation of new 500,000 gallon storage tank at the CSD's water treatment plant, including a new foundation

The exact construction schedules for cumulative projects are not currently known. However, construction it is not anticipated to overlap with the proposed Project. In addition, the footprint of the cumulative projects would either be within existing District facilities (tank cumulative projects) or be nominal (new well cumulative projects). Given the dissimilarity between the Project and the cumulative projects as to construction timing, and the limited scope of the both the Project and cumulative projects, the Project is not anticipated to create a significant cumulative impact on an environmental resource. Therefore, the Project meets this criterion.

4. Conclusion

Based on the review above, the Project qualifies for a categorical exemption from CEQA under Section 15301 and 15302 of the CEQA Guidelines. The environmental review and documentation reported above did not identify any significant effects that would occur from the Project, and the exceptions listed in Section 15300.2 of the CEQA Guidelines were found not to apply to the Project.

Additionally, the Project may qualify for statutory exemption from CEQA under Section 21080.47 of the CEQA Statute. The Project meets the project types identified by the section, and the environmental requirements of subsection 21080.47(c) are met. As stated in Section 3.2 of this memorandum, a review of the District's the contracting and/or labor agreement conditions (Statute subsection 21080.47(d)) is not included in this document.

5. References

California Environmental Protection Agency (CalEPA). Cortese List Data Resources. https://calepa.ca.gov/sitecleanup/corteselist/. Accessed October 2023.

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California Department of Water Resources (DWR). 2024. DAC Mapping Tool: ACS: 2016-2020 Census Places and Block Groups. Website: https://water.ca.gov/Work-With-Us/Grants-And-Loans/mapping-tools. Accessed February 16, 2024.

CHRIS Northwest Information Center. 2023. Record Search Results for proposed Redway Emergency Water Storage and Supply Project. December 19.