



# **Addendum to 2022 Initial Study / Mitigated Negative Declaration**

**Wastewater Infrastructure Improvements  
Project, SCH No. 2022120174**

Redway Community Services District  
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# Addendum to 2022 Initial Study / MND Wastewater Infrastructure Improvements Project, SCH No. 2022120174

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# 1. Introduction

## 1.1 Background

The Redway Community Services District (RCSD) has secured grant funding for the planning and design of improvements to the RCSD's wastewater treatment and collection system infrastructure, which is more than 50 years old. Years of active service have resulted in system wear despite ongoing maintenance. Many components of the system are at the end of their useful lives and are at risk of failure. The overall system has become labor intensive to operate and maintain, and there is limited ability to automate controls and alarms. These characteristics are common in older, smaller service districts, which can benefit from targeted engineering evaluation and upgrades to meet system needs and operate more effectively in the future.

The purpose of the Wastewater Infrastructure Improvements Project (Project) is to rehabilitate and replace aging infrastructure at the RCSD wastewater treatment facility (WWTF) to provide better reliability and increase wastewater treatment capacity to provide sufficient treatment capacity during wet weather events. Implementation of the Project would also improve lift station operations by installing equipment to support maintenance activities, replacing aging pumps, and installing communications and monitoring equipment to provide for automation and remote monitoring. See **Figures 1 and 2** for locations of the WWTF and lift stations.

Pursuant to the California Environmental Quality Act (CEQA), the RCSD prepared an Initial Study/Mitigated Negative Declaration and an Errata (collectively termed "2022 IS/MND") to analyze potential environmental impacts that could occur due to implementation of the Project. The 2022 IS/MND was adopted by the RCSD on February 15, 2023, and the Project and Mitigation Monitoring and Reporting Program (MMRP) was subsequently approved. The Notice of Determination was filed with the Humboldt County Clerk Recorder and Office of Planning and Research on February 17, 2023 and February 21, 2023, respectively.

Since adoption of the 2022 IS/MND, Project design has proceeded and additional design details have been developed involving the following Project components:

- Select WWTF infrastructure
- Select pipe bridge details
- Demolition of existing pipe bridge and piping
- Vegetation removal

See **Table 2.1** for a list of Project updates. The Project Area (i.e., area of disturbance associated with Project implementation) would not change as a result of Project updates.

## 1.2 Applicability and Use of an Addendum

As directed by CEQA, California Public Resources Code Section 21166, and CEQA Guidelines Section 15162, when a Mitigated Negative Declaration (MND) has been adopted for a project, no subsequent MND shall be prepared, unless one or more of the following circumstances occur:

*Section 15162. Subsequent EIRs and Negative Declarations*

- a. *When an EIR has been certified or a negative declaration 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.*

Section 15164 of the CEQA Guidelines provides procedural guidance for preparation and use of an addendum, as described below.

*Section 15164. Addendum to an EIR or Negative Declaration*

- a) *The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*
- b) *An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*
- c) *An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*
- d) *The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*
- e) *A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the*

*project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

### 1.3 Determination of CEQA Pathway

The change in environmental impacts due to the proposed Project updates has been evaluated and measured against the standards set forth in CEQA Guidelines Section 15162 (referenced above in Section 1.2) which outlines the circumstances under which a CEQA Lead Agency is required to prepare a Subsequent MND or to prepare an Addendum. **Section 3** presents an environmental analysis of each of the potential environmental effects associated with Project updates. The conclusion is that none of the circumstances requiring the preparation of a subsequent MND have been identified, as the changes in the Project design along with the circumstances surrounding the Project do not result in new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts requiring new mitigation measures beyond those addressed in the 2022 IS/MND.

Therefore, an Addendum to the 2022 IS/MND has been determined to be the appropriate CEQA document.

Per CEQA Guidelines Section 15164(c), an Addendum need not be circulated for public review. However, due to public interest in the Project, the RCSD has decided to post the Addendum on the RCSD's website at [redwaycsd.org](http://redwaycsd.org) for public review for 30 days. Should the public have a comment on this Project, they are invited to email the RCSD at [cody@redwaycsd.org](mailto:cody@redwaycsd.org), and/or attend the next RCSD Board Meeting to comment on this Addendum, which are typically held on the third Thursday of every month at 5:30 pm at the RCSD office 3168 Redwood Drive. Please visit [redwaycsd.org/board-meetings](http://redwaycsd.org/board-meetings) or call (707) 923-3101 for more information on how to attend an RCSD Board Meeting.

Per CEQA Guidelines Section 15164(d), the decision-making body shall consider an addendum prior to making a decision on a project. Accordingly, this Addendum, along with the 2022 IS/MND, will be considered by the RCSD Board of Directors prior to any future decision on the Project. This Addendum, along with the previous 2022 IS/MND, is on file with, and may be obtained from, the Redway Community Services District, 1150 Evergreen Road #2, Redway CA 95560, and found online at [redwaycsd.org](http://redwaycsd.org).

## 2. Updates to Project Since 2022 IS/MND

**Table 2.1** provides information on the components of the Project that were not included in the 2022 IS/MND. The table is broken out to include two sections: New Project Component, and Additional Detail on Existing Project Component. See **Figures 3, 4 and 5** for an overview of Project design.

**Table 2.1. Overview of Project Updates since the 2022 IS/MND**

New or Additional Information on Project Component	Project Component Name	Location
New Information	Dewatering system	WWTF footprint
New Information	Sludge storage tank with drainage sumps	WWTF footprint



New or Additional Information on Project Component	Project Component Name	Location
New Information	Manhole	WWTF footprint
New Information	400kw generator which would replace the existing generator. New generator would be ran monthly for four to six hours for maintenance	WWTF footprint
New Information	Generator fuel tank which would replace existing generator fuel tank	WWTF footprint
Additional Information	Sludge drying bed cover will now only be installed over southern sludge drying bed (and not the northern drying bed), and will include 8 feet wide and 2.5 feet deep footing trenches (formerly stated to require 2.0 feet width and 2.0 depth footing trenches)	WWTF footprint
New Information	Replacement of the existing 3-inch diameter influent pipeline across the Leggett Creek bridge with a new 3-inch diameter influent pipe. The influent pipeline delivers untreated wastewater from the CA Conservation Camp to the WWTF.	Leggett Creek bridge
Additional Information	Replacement of the existing 4-inch diameter effluent pipeline across the Leggett Creek bridge with two new 8-inch diameter effluent pipes	Leggett Creek bridge
Additional Information	Deactivation and removal of the existing pipe bridge would include one of these three options <sup>1</sup> :  Option A: Controlled Mechanical Disassembly  Option B: Cable and Winch System  Option C: Dismantling via Temporary Access Platforms  Each option would include a debris catchment plan.	Leggett Creek bridge
Additional Information	Vegetation removal would remain at up to 0.91 acres of woody vegetation within the Project Area boundary, however the specific location shifted slightly and greater detail is known on the tree species to be removed:  8 Douglas-fir trees ranging from 6 to 14 inches diameter at breast height (dbh)  4 coast redwood trees ranging from 10 to 16 dbh	Along service road between WWTF and percolation ponds, i.e.

<sup>1</sup> Details of each deactivation and removal option are included in Section 2.1 below. No work would occur within Leggett Creek.



New or Additional Information on Project Component	Project Component Name	Location
	1 black oak tree that is 8 inches dbh	

## 2.1 Demolition of Existing Bridge Details

The existing bridge would be disassembled utilizing one of the bridge demolition methods listed below.

- **Option A: Controlled Mechanical Disassembly.** This option would use aerial cranes (sky cranes or long-reach mobile cranes) from either canyon cliff side or a nearby plateau to support, cut and lift out segments of the bridge. Drones or robotic cutting tools suspended from cables may be utilized. Use of a helicopter may be utilized to air-lift out segments of the structure. No segments of the bridge or pipe would be placed in or come into contact with Leggett Creek.
- **Option B: Cable and Winch System.** This option would be considered if crane access is not possible and would involve the installation of a temporary cableway line across the canyon cliffs. Winches and trolleys would be used to support, cut and lower segments of the bridge and pipe in a controlled manner. The bridge and pipe segments would be lowered to the ground for further disassembly and disposal. No segments of the bridge or pipe would be placed in or come into contact with Leggett Creek.
- **Option C: Dismantling via Temporary Access Platforms.** Erect temporary scaffolds, suspension platforms or rope access systems anchored to both cliffs. Laborers utilizing rope access or the remote operated tools would cut the bridge and pipes into segments, which would be either lowered to the ground for further disassembly and removal, or removed by a helicopter air-lift. No segments of the bridge or pipe would be placed in or come into contact with Leggett Creek.

The contractor would select which option to implement for bridge and pipe demolition and create an accompanying debris catchment plan to prevent debris or dirt from entering Leggett Creek.

## 3. Analysis of Potential Environmental Effects

This section presents the environmental impact analysis of the proposed Project updates stated above in **Table 2.1**. The analysis refers back to the original evaluation of the impacts contained in the 2022 IS/MND, and identifies the change in impacts, if any, from the previously approved Project. Most of the information presented in the adopted 2022 IS/MND has not changed and is not repeated here. Please refer to the 2022 IS/MND for descriptions of setting, methodology, and complete identification and discussion of impacts.

### 3.1 Aesthetics

The 2022 IS/MND concluded that the Project would have no impact on aesthetic resources, including scenic resources, scenic vistas, visual character, and glare.

The proposed design updates are within the WWTF or pipe bridge corridor and are either at grade or below the surface. The same area of vegetation removal would occur. None of the proposed design updates include substantial changes to the original Project and do not include a new light source or would result in

glare. The changes would not impact a scenic vista or degrade the existing visual character or quality of public views.

The modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects relative to those identified in the 2022 IS/MND. Therefore, the updated Project would continue to result in no impact to aesthetic resources.

### **3.2 Agricultural and Forest Resources**

The 2022 IS/MND concluded that the Project would have no impact on agricultural and forest resources, including farmland conversion, agricultural zoning, and conversion, and a less than significant impact on forest zoning and conversion.

The updated Project does not require substantial revisions to the evaluation of agriculture and forest resources as defined in the 2022 IS/MND. In the southern portion of the effluent pipe alignment (between the WWTF and the southern bridge), some areas of vegetation removal have shifted approximately 35 feet southeast, within similar vegetative habitat. In other locations the proposed vegetation removal area occurs within the previously identified vegetation removal area. In total, 0.91 acre of vegetation may be removed under the Project, including up to 13 trees all still located in the path of the proposed pipe bridge alignment. The area where tree removal is proposed is zoned as Timberland Production Zone (TPZ). The total area of vegetation removal has not changed since the 2022 IS/MND, however has been clarified to include a maximum number of trees for removal. There is abundant lands zoned as TPZ within the Project parcel, and in the vicinity of the Project and the removal of 13 trees would not substantially modify the timber harvesting potential or available forestland that is available. Furthermore, the 13 trees to be removed could be subsequently utilized for timber products, if desired. Regarding agricultural resources, the Project Area does not include prime, unique, or farmland of statewide importance. The Project Area is not zoned for agriculture and is not covered by a Williamson Act contract. There are no changes to the impacts on farmland, agricultural or timberland zoning, or forests between the 2022 IS/MND and updated Project design. Project updates would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects relative to those identified in the 2022 IS/MND. Therefore, the updated Project would continue to result in no impact to agricultural resources and a less than significant impact to forest resources.

### **3.3 Air Quality**

The 2022 IS/MND concluded that the Project would have no impact on the implementation of an applicable air quality plan, and a less than significant impact on criteria pollutants, sensitive receptors, and other emissions such as odors.

The construction equipment and duration would remain the same as what was evaluated in the 2022 IS/MND, the Project changes would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Mitigation Measure AQ-1: BMPs to Reduce Air Pollution would still be applicable to the updated Project.

Project operations would remain as described in the 2022 IS/MND with the exception of the proposed new generator which would replace an existing, inefficient, older generator. As with the current generator, it would be run periodically for maintenance and if there is a power outage. The new generator would be required to meet all current EPA, state, and local regulations for use of emergency generators. Prior to installation, the RCSD would obtain an Authority to Construct, and after installation a Permit to Operate, from the North Coast Unified Air Quality Management District (NCUAQMD). Although the generator would

be a newer more efficient model it would have greater capacity, and therefore is expected to have similar or slightly higher emission rates as the existing generator. However, use of the generator would not exceed the NCUAQMD stationary source thresholds as identified in Table 4.3-1 of the 2022 IS/MND.

Operation and maintenance of the generator would not require additional vehicle trips above that previously evaluated in the 2022 IS/MND.

Project updates would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects relative to those identified in the 2022 IS/MND. Potential impacts related to air quality would remain less than significant after mitigation.

### **3.4 Biological Resources**

The 2022 IS/MND concluded that the Project would have a less than significant impact, after incorporation of mitigation, on special status species, riparian habitat, and wetlands. The 2022 IS/MND concluded the Project would not impact species migration or conflict with local policies, an adopted Habitat Conservation Plan, a Natural Community Conservation Plan, or similar plans.

#### **Wildlife**

Impacts to mammals, bats, passerines and raptors, reptiles and amphibians, and fish would remain the same as described in the 2022 IS/MND.

Mitigation measures included in the 2022 IS/MND would still be applicable and would reduce the impacts related to Project construction to less than significant, including:

- Mitigation Measure BIO-1: Limitations to Overnight Excavation Areas
- Mitigation Measure BIO-2: Protect Special Status Bats
- Mitigation Measure BIO-3: Protect Nesting Birds
- Mitigation Measure BIO-4: Protect Special Status Reptiles and Amphibians

With incorporation of Mitigation Measure BIO-1 through BIO-4, impacts to wildlife would remain less than significant.

#### **Vegetation Removal**

As mentioned in **Table 2.1**, the vegetation removal remains at 0.91 acres, however has shifted slightly to align with minor adjustments of Project elements. The shifted area includes the same habitat as was considered in the 2022 IS/MND (Douglas-fir, redwood, and tanoak forest), and the same total area of vegetation removal would occur (see **Figure 5**).

#### **Wetlands and Water Quality**

The 2022 IS/MND did not include mention of the existing influent pipeline across the Leggett Creek pipe bridge. The existing pipe bridge and pipes would be demolished and a new pipe bridge would be constructed, and the existing 3-inch diameter influent pipeline would be replaced with a new 3-inch diameter influent pipeline, and the existing 4-inch diameter effluent pipe would be replaced with two 8-inch diameter effluent pipes. The existing pipe bridge and pipes would not be demolished until the proposed bridge and piping are adequately installed and connected to the WWTF system and associated piping. Connection to the existing wastewater system would not cause an adverse impact to water quality because the existing pipelines would be temporarily shut down and cleaned of remnant waste in the work area using chlorinated water prior to being connected to the new system. The demolition of the pipe bridge and piping would occur over Leggett Creek utilizing one or a combination of the options listed in **Section 2.1**. No

segments of bridge or pipe would be placed within Leggett Creek, and no debris would enter Leggett Creek per the debris catchment system that would be implemented in tandem with demolition.

In summary, the modified Project would not result in new significant environmental impacts or a substantial increase in the severity of impacts to biological resources previously addressed in the 2022 IS/MND. With the incorporation of the planned mitigation measures, potential impacts related to biological resources would remain less than significant level or at no impact.

### **3.5 Cultural Resources**

The 2022 IS/MND concluded that the Project would have a less than significant impact with mitigation for cultural resources with the incorporation of Mitigation Measure CR-1 through CR-3. The 2022 IS/MND concluded no impact to historical resources would occur from implementation of the Project.

The Project, as analyzed in the 2022 IS/MND, included elements of excavation within a documented archaeological resource that occurs in the southern portion of the Project Area, and overlaps with the southern and most of the northern sludge drying beds.

Under the 2022 IS/MND, proposed Project elements within the midden include replacement of the roof cover structure on the southern and northern sludge drying beds to occur in the same footprint as the existing roof cover structure. The 2022 IS/MND described the roof structure replacements as requiring new footings to be installed via a 2-foot wide by 2-foot deep trench around the perimeter of the northern and southern drying beds. However, under the updated Project design, only the roof cover over the southern sludge drying beds would be replaced, and would require approximately 26 footings, and installed via excavation of a trench that is 8-feet wide and 2.5-feet deep. Resulting in an additional 0.5-foot deeper excavation in the midden/high integrity intact deposit area.

The 2022 IS/MND included documentation of the correspondence that occurred with the Bear River Band of Rohnerville Rancheria about the Project, potential impacts and protective measures to the identified archaeological resource (i.e. the midden). These protective measures include Mitigation Measures CR-1 through CR-3, with CR-1 (Protect Archaeological Resources) being specific to the documented archaeological resource. RCSD has discussed the proposed 0.5-foot increase in depth of excavation and 6-foot increase in trench width at the southern sludge drying beds with the Bear River Band of Rohnerville Rancheria who have expressed that implementation of Mitigation Measure CR-1 would remain adequate in protecting potentially discovered archaeological resources from this activity. Mitigation Measure CR-1 is copied below with no changes from the 2022 IS/MND:

#### **Mitigation Measure CR-1: Protect Archaeological Resources**

The following measure shall be completed for all subsurface work within the WWTF APE.

- Excavations within the WWTF APE and within the archaeological site P-12-000874 shall not exceed the proposed excavation footprint. Work in the area will be carefully performed so as not to disturb more of the midden deposit than is necessary for Project implementation.
- A Tribal Cultural Monitor from the Bear River Band of the Rohnerville Rancheria shall be present during all ground Disturbing activities within the WWTF APE.
- For all ground disturbing activities within the southern portion of the WWTF APE, where P-12-000874 is documented, a professional archaeologist who meets the secretary of interior standards shall be retained to conduct archaeological monitoring. The archaeological monitor will recover and document any artifacts or features that may contain pertinent data

about the site. The archaeological monitor will prepare a monitoring report detailing any findings and update the site record if appropriate.

- Prior to project implementation, a monitoring plan should be drafted in consultation with the Bear River Band of the Rohnerville Rancheria to determine the specifics of postimplementation recording requirements, how discoveries will be addressed, and how collections will be curated or reburied. Consultation with the Native American Heritage Commission to determine the most likely descendant for this site may also be appropriate and will assist the consultation process should human remains be inadvertently discovered.

No new impacts to cultural resources are anticipated to occur from implementation of the Project because no Project elements have substantially changed. All mitigation measures including Mitigation Measure CR-1 (Protect Archaeological Resources), Mitigation Measures CR-2 (Inadvertent Discovery of Cultural Resources), and CR-3 (Protect Human Remains if Encountered During Construction) would be implemented during Project construction. With the incorporation of the existing mitigation measures, all potential impacts to cultural resources would be reduced to a less than significant level.

### **3.6 Energy**

The 2022 IS/MND concluded that the Project would have a less than significant impact on consumption of energy resources. The 2022 IS/MND determined the Project would not conflict with a state or local energy plan.

Project updates would not modify the intensity and duration of construction as compared to the evaluation in the 2022 IS/MND. Operationally, the site is anticipated to utilize additional energy per the rehabilitation or upgrade of electrical systems at the site.

When there is a power outage, use of the proposed generator would result in an increase in the amount of energy being used onsite, however the generator must be utilized to enable continued operation of the WWTF. All energy usage would be to support efficient WWTF functions and would not be considered wasteful, inefficient, or unnecessarily consumptive. Therefore, these Project updates would not result in new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts to energy resources identified in the 2022 IS/MND. Therefore, the updated Project would continue to result in either no impact or a less than significant impact to energy resources.

### **3.7 Geology & Soils**

The 2022 IS/MND concluded that the Project would have a less than significant impact with mitigation on paleontological resources with the incorporation of Mitigation Measure GEO-1. The 2022 IS/MND concluded the Project would have a less than significant impact on erosion and risks due to seismic activity, and no impact on landslides, liquefaction, expansive soils, or septic/waste water capacity.

Project updates do not require substantial revisions to the evaluation of geology and soils. The Project elements are within the same geologic setting, and there are no changes to the risks associated with erosion, faults, ground shaking, liquefaction, landslides, expansive soils, or septic systems. The Project would continue to incorporate Mitigation Measure GEO-1: Inadvertent Discovery of Paleontological Resources and Mitigation Measure BIO-6: Protection of Water Quality and Wetlands, and would include a debris containment system during bridge demolition to capture potential dirt and debris. The modified Project would not result in new significant environmental impacts or a substantial increase in the severity of previously identified significant impact relative to those identified in the 2022 IS/MND. Therefore, the

updated Project would continue to result in either no impact, a less than significant impact, or a less than significant impact with mitigation incorporated to geology and soils.

### **3.8 Greenhouse Gas Emissions**

The 2022 IS/MND concluded that the Project would have a less than significant impact on greenhouse gas emissions and would not conflict with, and thus have no impact on, regulated applicable greenhouse gas plans and policies.

Project updates regarding construction or operation do not require revisions to the evaluation of greenhouse gas emissions because the intensity and duration of construction would be unchanged from that evaluated in the 2022 IS/MND. The BAAQMD's 2017 CEQA Guidelines contain a recommended GHG threshold of 1,100 MTCO<sub>2</sub>e/year for project operations, which is roughly equivalent to 54 residential dwelling units (SMAQMD 2014). Use of the proposed generator would not equate or exceed the GHG emissions from 54 residential dwelling units and would therefore not exceed the operational threshold to result in a new significant impact. The updated Project would not result in new significant environmental impacts or a substantial increase in the severity of previously identified significant impact for GHG as stated in the 2022 IS/MND.

### **3.9 Hazards and Hazardous Materials**

The 2022 IS/MND concluded that the Project would have a less than significant impact with mitigation on public hazards with the incorporation of Mitigation Measure HAZ-1. The 2022 IS/MND also concluded the Project would have a less than significant impact on hazardous materials, airport use plans, and wildfire risks, and would have no impact on hazardous emissions and emergency plans.

Project updates do not require revisions to the evaluation of hazards and hazardous materials. The intensity and duration of construction, types of materials to be utilized during construction, and operations management would be unchanged from that evaluated in the 2022 IS/MND.

The updated Project would not result in new significant environmental impacts or a substantial increase in the severity of previously identified significant impact for hazards and hazardous materials as stated in the 2022 IS/MND.

### **3.10 Hydrology and Water Quality**

The 2022 IS/MND concluded that the Project would have a less than significant impact on water quality, drainage patterns, and no impact on flood hazards and groundwater.

Project updates do not require substantial revisions to the evaluation of hydrology and water quality. The footprint of the Project is unchanged from that evaluated in the 2022 IS/MND and does not include in-water work. As mentioned in **Table 2.1**, a debris catchment plan would be implemented to prevent dirt or debris from entering waterways during bridge demolition. Standard BMPs would be implemented throughout construction to limit potential inputs of pollutants into waterways. Therefore, new impacts than previously identified in the 2022 IS/MND to water quality would not occur.

The 2022 IS/MND did not mention the existing influent pipeline that crosses Leggett Creek (with untreated wastewater). The influent line would be replaced which generally includes trenching and installation of the new influent piping, followed by temporary shutdown of the system and flushing of potential residual wastewater from the existing pipeline into a storage tank utilizing chlorinated water, cutting the existing pipeline north and south of the bridge to safely and sanitarily connecting the new influent pipeline to it for

use. The portions of the existing influent pipeline that would not be utilized anymore that occur subsurface would be abandoned in place and capped where it meets the surface, and portions of the existing influent pipeline that occur above ground (such as on the pipe bridge) would be demolished and disposed of. This installation would not affect water quality because the system would be temporarily shut down and cleared of residual wastewater prior to construction activities involving the connection of the new influent pipeline and decommissioning of the existing influent pipeline.

The Project updates would not result in physical barriers that would inhibit the existing floodplain characteristics of Leggett Creek, particularly given Leggett Creek is in a deep canyon.

The updated Project would not result in new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts relative to those identified in the 2022 IS/MND. Potential impacts related to hydrology and water quality would remain less than significant or no impact.

### **3.11 Land Use and Planning**

The 2022 IS/MND concluded that the Project would have no impact related to physically dividing an established community and would not conflict with land use plans or policies. As described in **Section 3.2**, the area where trees are proposed for removal is zoned as TPZ. However, this action would not conflict with the existing zoning, and would not present a substantial economic impact because the trees are located near the top of the canyon which is in an area unlikely to be harvested, and because there is abundant forestland in the vicinity of the Project that is more suitable for timber harvesting than what is located within the Project footprint.

The updated Project would not affect environmental resources related to land use and planning. The modified Project would not result in new significant environmental impact and the Project would continue to have no negative impact on land use and planning.

### **3.12 Mineral Resources**

The 2022 IS/MND concluded that the Project would have no impact on the loss of locally-important mineral resources and regional or state important mineral resources.

The updated Project would not affect any resources related to mineral resources from the excavation or importation of resources to construct the Project. And would have no impact on mineral resources from Project operation. The modified Project would not result in new significant environmental impacts and no impact to mineral resources would occur from implementation of the Project.

### **3.13 Noise**

The 2022 IS/MND concluded that the Project would have a less than significant impact on the generation of excessive noise and vibration, and no impact on airport land use plans.

The intensity and duration of construction would be unchanged from that evaluated in the 2022 IS/MND. Nighttime construction would not occur. The updated Project would replace an older existing generator with a newer generator, that is likely quieter and not louder than the existing generator. Therefore noise associated with the Project would either remain consistent with, or be reduced from what was analyzed in the 2022 IS/MND. Potential impacts related to noise from implementation of the Project would remain less than significant or no impact.



### **3.14 Population and Housing**

The 2022 IS/MND concluded that the Project would have no impact on population growth and housing displacement.

The updated Project would not displace existing housing or people, rather would increase functionality and capacity of the WWTF. As discussed in **Section 2**, an additional effluent pipe would be included on the pipe bridge, and both effluent pipes would be 8-inches in diameter (the existing single effluent pipe is 4-inches in diameter). The increased capacity of the additional effluent pipe is to provide additional WWTF capacity during wet weather events and therefore would not encourage population growth and would not result in new significant environmental impacts. The proposed influent pipe would remain at 3-inches in diameter and would not modify capacity of incoming wastewater to be treated at the WWTF. The updated Project would not result in new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts relative to those identified in the 2022 IS/MND. Potential impacts related to population and housing impacts would remain as no impact.

### **3.15 Public Services**

The 2022 IS/MND concluded that the Project would have no impact to fire and police protection, schools, parks, and other public facilities.

The updated Project would continue to rehabilitate and replace aging infrastructure at the WWTF to provide better reliability and increase wastewater treatment capacity to provide sufficient treatment capacity during wet weather events; not to advance or facilitate future population growth where an increase in public services would be required. The updated Project would not result in new significant environmental impacts to public services, and there would be no potential impact to public services from implementation of the Project.

### **3.16 Recreation**

The 2022 IS/MND concluded that the Project would have no impact on parks or other recreational facilities.

The updated Project would not result in a modification to the duration of construction, or in Project operation. The YMCA camp is located approximately 185 feet from the WWTF and is utilized seasonally in the summer. The proposed generator would be ran once a month to ensure proper functioning. The existing generator has been run on the same general schedule, and the momentary noise associated with generator use is a baseline condition that would not substantially deviate under the proposed generator. As discussed in **Section 3.13**, it is assumed that the new generator will be quieter than the existing generator, thereby reducing noise as compared to baseline conditions. Construction would not prevent access to the YMCA camp. Therefore, the updated Project would not result in new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts relative to those identified in the 2022 IS/MND. There would be no potential impact to recreation from implementation of the Project.

### **3.17 Transportation**

The 2022 IS/MND concluded that the Project would have a less than significant impact on road geometry and emergency access, and no impact on applicable transportation plans or policies.

The updated Project would not change the analysis of potential impacts to transportation resources because no Project updates affect transportation resources. Therefore, the updated Project would not result

in new significant environmental impacts, and potential impacts to transportation resources would remain less than significant or no impact.

### **3.18 Tribal Cultural Resources**

As mentioned in the 2022 IS/MND:

As part of the AB 52 process, GHD on behalf of the RCSD sent notifications for the opportunity to consult to appropriate tribal governments as identified by the Native American Heritage Commission. Notifications were distributed on August 26, 2022 to the Bear River Band of Rohnerville Rancheria (BRBRR). An email exchange occurred between GHD and BRBRR's Tribal Historic Preservation Officer (THPO), and a response was received from BRBRR on September 11, 2022. The BRBRR does not want to carry out consultation under AB52 because they determined that the Project is not likely to cause a substantial adverse change in the significance of a tribal cultural resource as defined under AB52.

The updated Project would not affect tribal cultural resources. As mentioned in **Section 3.5** above and in the 2022 IS/MND, excavation would occur in an area with high potential for in tact cultural resources. However, as described in the 2022 IS/MND, this excavation would stay within the limit of existing disturbance, and Project updates have been disclosed with the Bear River Band of Rohnerville Rancheria who are in support of incorporation of Mitigation Measure CR-1. Potential impacts to tribal cultural resources due to Project updates would not result in a new significant environmental impact, and potential impacts related to tribal cultural resources would remain no impact.

### **3.19 Utilities and Service Systems**

The 2022 IS/MND concluded that the Project would have a less than significant impact on solid waste generation and associated compliance, and no impact on new or expanded utility connections, water supplies, and wastewater treatment.

The updated Project does not require water or wastewater services above and beyond what was considered in the 2022 IS/MND, and would not result in an appreciable increase in impervious surfaces and associated storm water runoff from what was considered in the 2022 IS/MND. The updated Project would include increased capacity in the effluent pipes; however, the pipes would be supporting the same function of providing additional WWTF capacity during wet weather events as identified within the original 2022 IS/MND. As shown in **Table 2.1** there would be no change to the influent pipeline capacity. Potential impacts related to utilities and service systems would remain less than significant or no impact.

### **3.20 Wildfire**

The 2022 IS/MND concluded that the Project would have a less than significant impact on exacerbated fire risk and flooding or landslides post-fire, and no impact on emergency planning and risk of wildfire spread.

The updated Project would not result in updates to emergency response planning, Project design slopes, the need for installation of maintenance, or expose people or structures to significant risk, above and beyond what was considered in the 2022 IS/MND. The proposed generator and generator fuel tank would be replacing an existing generator and associated fuel tank, and is not considered a new element that would increase hazards related to wildfire as defined in the 2022 IS/MND. Potential impacts related to wildfire would remain less than significant or no impact.

### **3.21 Mandatory Findings of Significance**

This Addendum discusses the topic areas in the sequence as they are addressed in the 2022 IS/MND. This section concludes that the Project updates are not likely to cause a substantial modification to impacts or result in new significant impacts compared to the previously adopted 2022 IS/MND. The 2022 IS/MND mitigation measures remain in effect, and would reduce potential impacts to less than significant levels. The Project updates would not result in new significant environmental impacts or a substantial increase in the severity of impacts related to the mandatory findings of significance previously addressed in the 2022 IS/MND.

## **4. Report Preparers**

### **4.1 GHD**

Kerry McNamee, Senior Environmental Planner, Primary Author

Christian Hernandez, Environmental Scientist, Author

Jack Sutton, PE, Project Engineer, Reviewer

Christopher Wolf, Natural Resources and Impact Assessment Business Group Leader, Reviewer

## **5. References**

Environmental Protection Agency (EPA). 2004. Control of Emissions of Air Pollution From Nonroad Diesel Engines and Fuel. Federal Register Vol. 69, No. 124, Pg. 38958.

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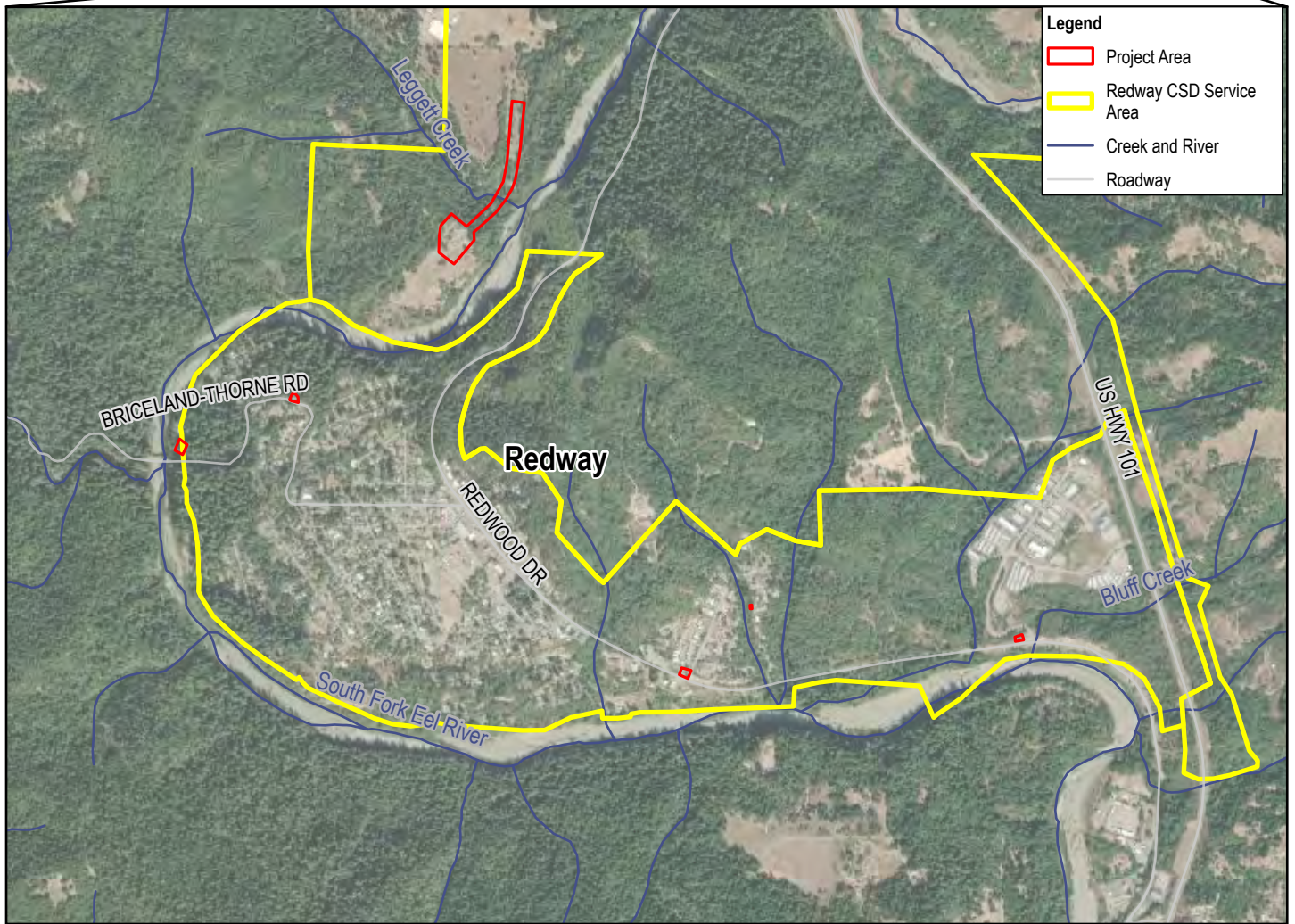
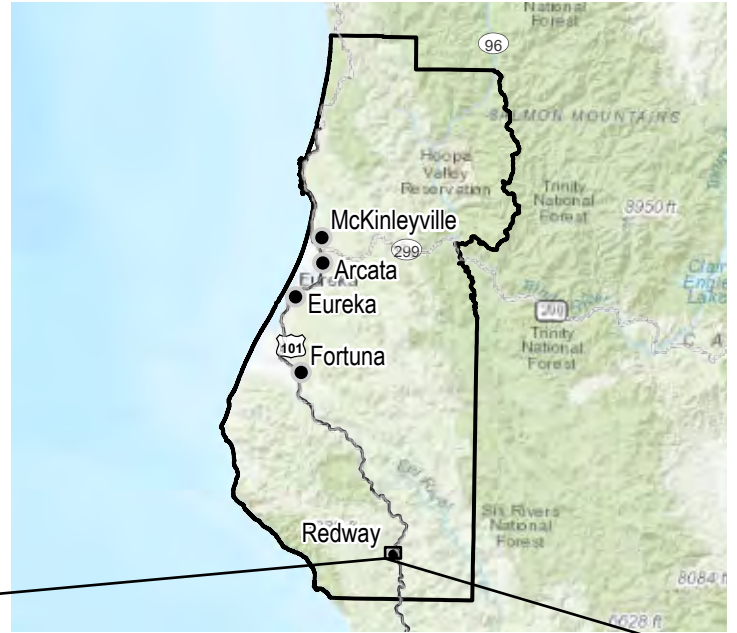
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# Appendix A

## Figures

- Figure 1**      **Locator Map**
- Figure 2**      **Project Boundary**
- Figure 3**      **Project Components**
- Figure 4**      **WWTF Infrastructure**
- Figure 5**      **Vegetation Removal and Pipe Bridge**



Paper Size ANSI A  
0 570 1,140 1,710 2,280  
Feet

Map Projection: Lambert Conformal Conic  
Horizontal Datum: North American 1983  
Grid: NAD 1983 StatePlane California 1 FIPS 0401 Feet



**Redway Community Services District  
Wastewater System Infrastructure  
Improvement Project**

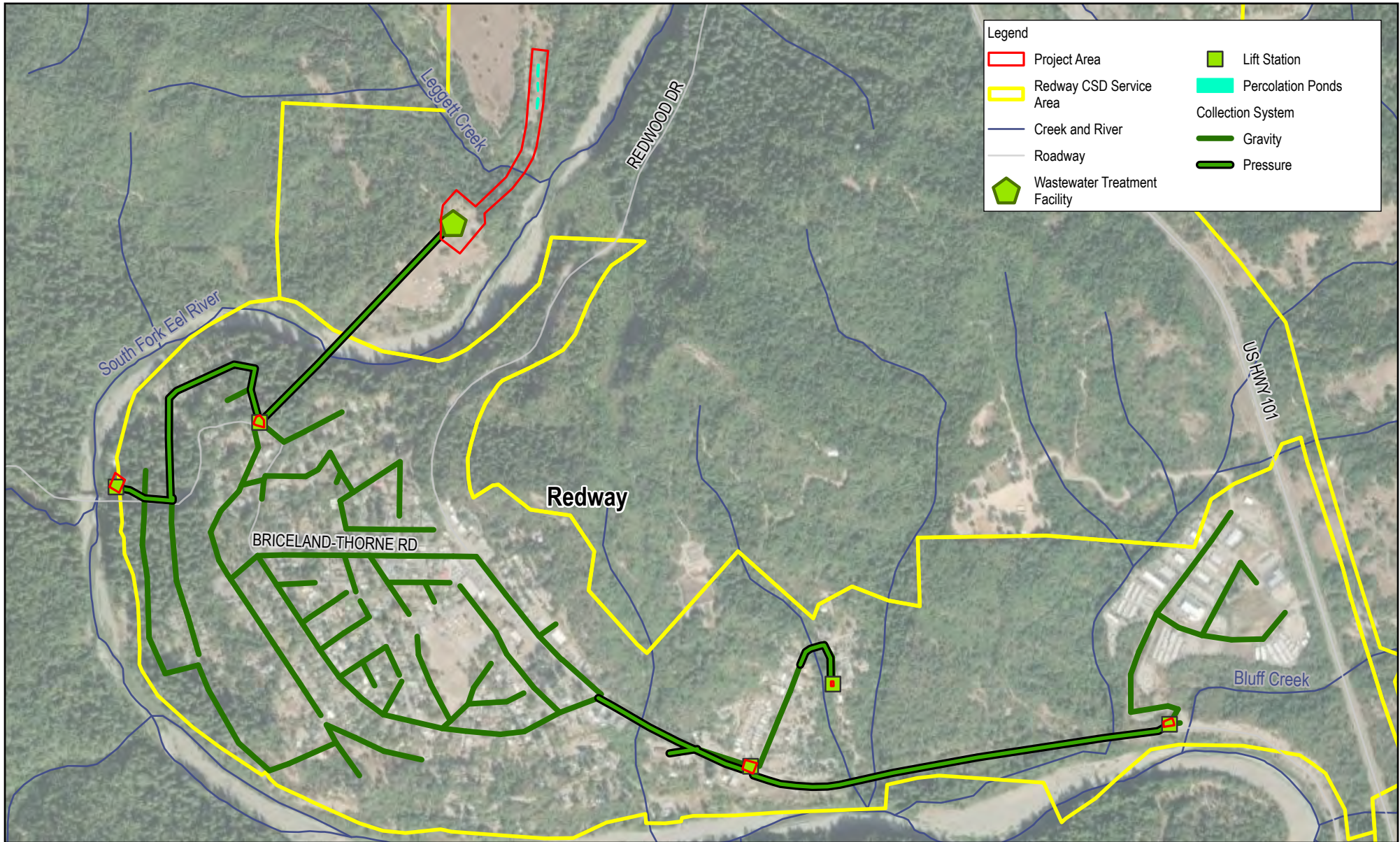
Project No. 11214230  
Revision No. -  
Date Nov 29, 2022

**CEQA Addendum Figure 1**

**Project Vicinity**

**FIGURE 1**





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Map Projection: Lambert Conformal Conic  
Horizontal Datum: North American 1983  
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**Redway Community Service District  
Wastewater System Infrastructure  
Improvement Project**

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**CEQA Addendum Figure 2**

**Project Area**

**Figure 2**

Secondary treatment upgrades

Clarifier distribution box

Clarifier 1 retrofit

Chlorine contact basin and effluent upgrades

RAS pump station upgrades

New pipework

Clarifier 2 rehabilitation

Headworks upgrade

Sludge drying upgrades



Redway Community Service District  
Wastewater System Infrastructure  
Improvement Project

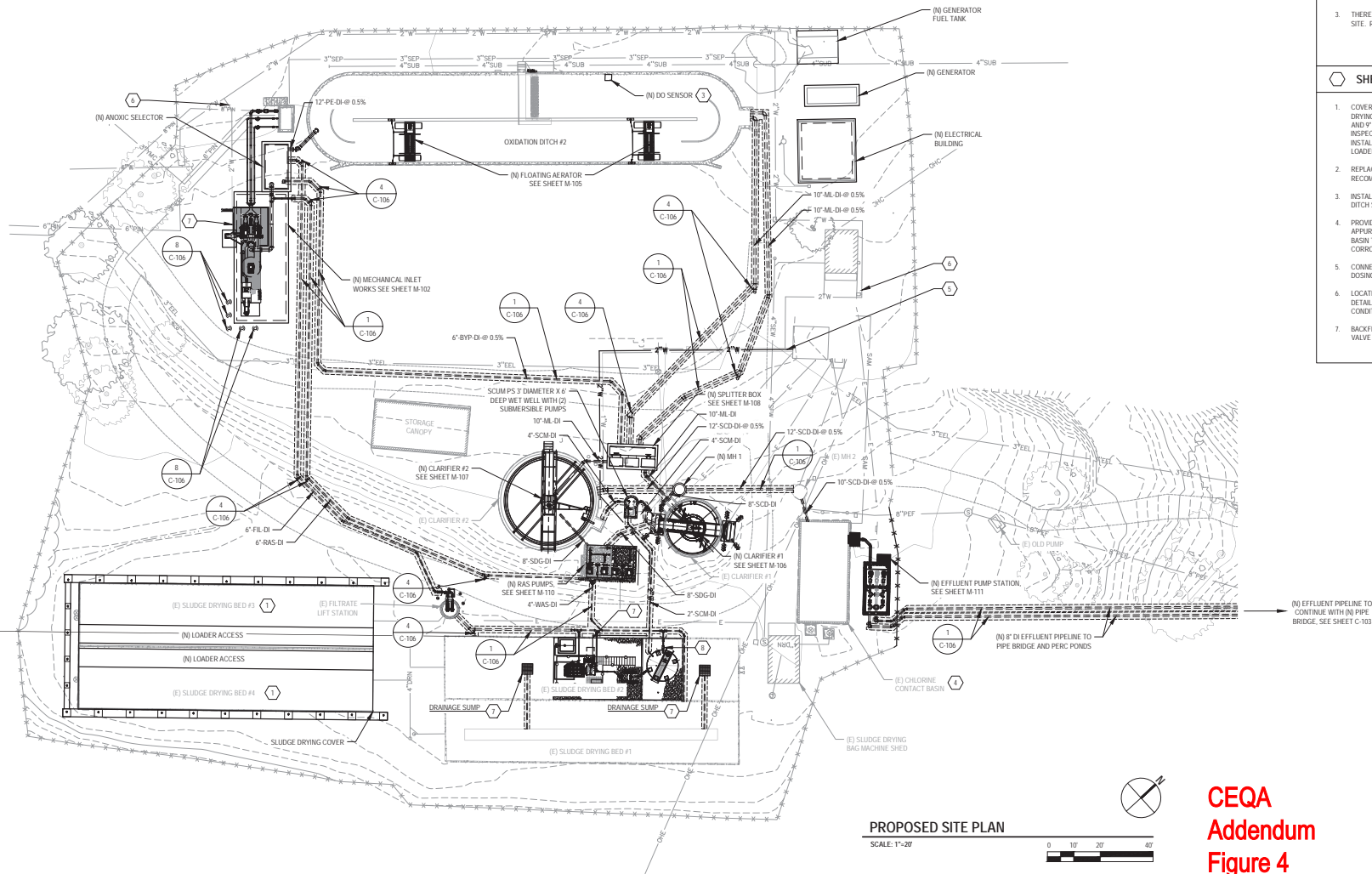
Project No. 11214230  
Revision No. -  
Date Oct 13, 2022

**CEQA Addendum Figure 3**

**WWTF Project Components**

**FIGURE 3-5**





# SHEET GENERAL NOTES

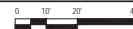
1. REFER TO DETAIL 1 ON C-106 FOR PIPE TRENCH DETAIL.
2. NOT ALL VALVES AND FITTINGS AND INSTRUMENTS ARE SHOWN. REFER TO PAIDS FOR ADDITIONAL DETAILS.
3. THERE ARE SENSITIVE UNDERGROUND CULTURAL RESOURCES ON SITE. REFER TO THE XX REPORT FOR MORE DETAILS.

## SHEET KEYNOTES

1. COVER SLUDGE DRYING BED #4 TO MATCH MEDIA IN SLUDGE DRYING BED #3. INVOLVING 14\"/>

### PROPOSED SITE PLAN

SCALE: 1\"/>



**CEQA  
Addendum  
Figure 4**

**90% SUBMITTAL**

D	90% DESIGN SUBMITTAL	CP LH SG CP GT SG	09/05/2025
C	60% DESIGN SUBMITTAL	CP LH SG CP GT SG	12/16/2024
B	30% DESIGN SUBMITTAL REVISION	LH CP CP GT	06/06/2023
A	30% DESIGN SUBMITTAL	LH CP SG CP GT SG	12/05/2022
No.	Issue	Checked	Approved
Author	O. MALKO	Drafting Check	A. FOSCATO
Designer	J. SUTTON	Design Check	C. PRETORIUS
		Project Director	G. TOMASINO
		Project Director	A. HANAMASAGAR



Bar is one inch on original size sheet  
0 1"



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Client	REDWAY COMMUNITY SERVICES DISTRICT
Project	WASTEWATER SYSTEM IMPROVEMENTS

Project No.	11214230
Date	SEPT. 2025
Scale	AS SHOWN

THW	PROPOSED SITE PLAN AND YARD PIPING
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Sheet No.	C-103
Sheet	9 of 99

