

INITIAL STUDY and NEGATIVE DECLARATION

FOR

PLACE AND PURPOSE OF USE, EXTENSION OF TIME, AND INSTREAM
DEDICATION PROJECT

November 2025

Lead Agency:
Redway Community Services District



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LACO Project No. 7009.04

TABLE OF CONTENTS

I. PROJECT SUMMARY	1
II. PROJECT DESCRIPTION	4
III. PROJECT SETTING AND LOCATION	26
IV. ENVIRONMENTAL EFFECTS.....	28
V. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED.....	28
ENVIRONMENTAL IMPACT ANALYSIS:	
I. AESTHETICS	30
II. AGRICULTURE AND FORESTRY RESOURCES.....	32
III. AIR QUALITY.....	34
IV. BIOLOGICAL RESOURCES	36
V. CULTURAL RESOURCES.....	42
VI. ENERGY.....	44
VII. GEOLOGY AND SOILS	46
VIII. GREENHOUSE GAS EMISSIONS	49
IX. HAZARDS AND HAZARDOUS MATERIALS.....	52
X. HYDROLOGY AND WATER QUALITY.....	56
XI. LAND USE AND PLANNING	61
XII. MINERAL RESOURCES	64
XIII. NOISE	65
XIV. POPULATION AND HOUSING.....	67
XV. PUBLIC SERVICES.....	69
XVI. RECREATION	72
XVII. TRANSPORTATION.....	73
XVIII. TRIBAL CULTURAL RESOURCES.....	75
XVIX. UTILITIES AND SERVICE SYSTEMS.....	77
XX. WILDFIRE	80
XXI. MANDATORY FINDINGS OF SIGNIFICANCE	82
VI. REFERENCES.....	84

FIGURES, TABLES, AND APPENDICES

Figures

Figure 1:	Location Map	6
Figure 2:	Petition to Change - License No. 3791	7
Figure 3:	Petition to Change - Permit No. 15665	8
Figure 4:	Petition to Extend Time – Permit No. 15665	9
Figure 5:	Petition to Dedicate – Permit No 15666	10
Figure 6:	Land Use Designations Map	11
Figure 7:	Zoning Designations Map	12
Figure 8:	Total Diversion Amounts Per Year	27
Figure 9:	National Wetlands Inventory Map.....	41

Tables

Table 1:	Summary of Changes Proposed for Current Place of Use (License No. 2791 and Permit No. 15665)	5
Table 2:	Subject Properties included under Expanded Place of Use (License No. 3791 and Permit No. 15665)	13
Table 3:	Summary of RCSD's Existing Water Rights	18
Table 4:	Annual RCSD Diversion Amounts from SF Eel River	22
Table 5:	Annual RCSD Reported Diversion Amounts from Unnamed Spring (Permit No. 015666).....	25
Table 6:	Species with the Potential to Occur at or Within Vicinity of the Site	38
Table 7:	California's GHG Emissions by Economic Sector in 2022.....	50
Table 8:	GeoTracker Sites Within 2 Miles of the Project.....	53
Table 9:	Undeveloped Properties within Project Area to be Added to POU	62

Appendices

Appendix A:	Water Rights Documentation
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I. PROJECT SUMMARY

Date: November 2025

Project Title: Place and Purpose of Use, Extension of Time, and Instream Dedication Project

Lead Agency: Redway Community Services District

Contact: Cody Cox, General Manager
Redway Community Services District
P.O. Box 40
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Location: The project area (herein referred to as "Project area") consists of approximately 867.2 acres total acres within the community of Redway in unincorporated Humboldt County, California. The Project area includes all proposed changes under the proposed project ("Project"), including proposed Place and Purpose of Use (including parcels to be added and removed), area proposed for licensing, and area proposed for dedication (further defined below; see Figure 1).

Under the Project, approximately 278.72 acres is proposed to be added to the Place of Use, including the Meadows Business Park, located off Evergreen Road, YMCA Camp Ravenclyff (APN: 222-222-004, 16.48 acres), located north of the town core, and 50.10 acres to be removed under the requested Petition for Change associated with License No.: 003791 (see Figure 2). Under the requested Petition for Change associated with Permit No. 015665 (see Figure 3), 239.42 acres are proposed to be added to the Place of Use, with 88.43 acres proposed to be removed. In addition, the Petition for Change also includes adding "municipal" as a Purpose of Use associated with License No.: 003791 (518.8 acres). With the proposed changes in Place and Purpose of Use, a total of 747.3 acres would be served under the existing water rights by RCSD, herein referred to as the proposed Place of Use.

The Permit to Extend Time associated with Permit No. 015665 includes approximately 596.2 acres, including the town core and YMCA camp (see Figure 4). The 596.2-acre area is described as the current Place of Use for Permit No. 015665.

While the Place of Use associated with Permit No. 015666 (unnamed spring) included approximately 500.6 acres (including the town core and YMCA camp; see Figure 5), use of this diversion ceased in 2008. RCSD is seeking to permanently dedicate the stream reach and allocated diversion amount for instream use for recreational and fish and wildlife preservation and enhancement ecological and recreational purposes through a Petition to Dedicate through the State Water Resources Control Board (SWRCB).

Coastal Zone: No

Affected Parcel(s): Properties (or portions thereof) included under the proposed Place Use adjustments include the following Assessor's Parcel Number(s) (APNs): 077-011-010, 077-011-012, 077-051-001, 077-051-010, 077-051-011, 077-051-012, 077-061-010, 077-071-006, 077-071-009, 077-071-012, 077-071-013, 077-092-011, 077-092-013, 077-131-001, 077-171-006, 077-171-008, 077-171-010, 077-281-015, 077-351-010, 077-351-014, 222-151-001, 222-151-003, 222-151-004, 222-151-005, 222-151-007, 222-151-010, 222-152-002, 222-152-003, 222-152-004, 222-221-004, 222-221-005, 222-222-002, 222-222-004, 222-222-006, 222-222-011, 222-222-013, 222-222-014, 223-171-018, 223-171-019, 223-171-020, 223-171-021, 223-311-003, 223-311-004, 223-311-005, 223-311-006, 223-311-007, 223-311-008, 223-311-009, 223-311-010, 223-311-011, 223-311-012, 223-311-013, 223-311-016, 223-311-017, 223-311-018, 223-311-019, 223-311-022, 223-311-023, 223-311-024, 223-311-025, 223-311-026, 223-311-027, 223-311-028, 223-311-029, 223-311-030, 223-311-031, 223-311-032, 223-311-035, 223-311-036, 223-311-037, 223-311-040, 223-311-041, 223-311-042, 223-311-043, 223-311-044, and 223-311-045 (see Table 2).

Note: The Purpose of Use, Extension of Time, Licensing, and Instream Flow Dedication are administrative in nature and would not affect the boundaries or new development to occur on the properties included under these actions. Total acres included under these actions include the following (all areas are approximate):

- Purpose of Use (License No.: 003791): 518.8 acres (see Figure 2)
- Extension of Time (Permit No.: 015665): 596.2 acres (see Figure 4)
- Licensing (Permit No.: 015666): 500.6 acres (see Figure 5)
- Instream Flow Dedication (Permit No.: 015666): 500.6 acres (see Figure 5)

Humboldt County General Plan Land Use Designations: Commercial General (CG), Commercial Services (CS), Industrial-General (IG), Public (P), Public Facility (PF), Residential Agriculture (RA), Residential-Low Density (RL), and Timberland (T) (see Figure 6).

Humboldt County Zoning Designations: Agriculture Exclusive (AE), Agriculture General (AG), Business Park (MB), Flood Plain (FP), Forestry Recreation (FR), Industrial Commercial (C-3), Residential One-Family (R-1), Timberland Production Zone (TPZ), and Unclassified (U) (see Figure 7).

Anticipated Permits and Approvals:

- 1) State Water Resources Control Board approval of:
 - a. Petition for Changes to Water Rights (Water Code Section 1701) (Application No. 457952; Appropriative Right No. A011876, Permit No. 007489, License No. 003791 and Appropriative Right No. A023017, Permit No. 015665)
 - b. Petition for Time Extension (Application No. 457953; Appropriative Right No. A023017; Permit No. 015665)
 - c. Petition for Instream Dedication (Appropriative Right No. A023018; Permit No. 015666)

Tribal Cultural Resources:

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?:

On September 16, 2025, LACO Associates (LACO), on behalf of the RCSD, submitted a request for a Native American Contact List to the Native American Heritage Commission (NAHC). A response was received from

the NAHC, which indicated a search of the Sacred Lands File (SLF) was negative and included the contact information for one local tribal contact with the Bear River Band of the Rohnerville Rancheria in Loleta. In accordance with Assembly Bill (AB) 52, RCSD, as lead agency under CEQA, sent a letter to the tribal contact on September 29, 2025, to describe the Project and offer consultation on the Project. Specifically, the RCSD offered for the Tribe, a consulting party, to help identify properties and resources in the Project area that may have religious and cultural significance to the Tribe, and if such properties exist, to help assess how the Project might affect them and discuss possible ways to avoid, minimize, or mitigate potential adverse effects of the Project. As of the date of this Initial Study, no responses or comments have been received.

CEQA Requirement:

The proposed project is subject to the requirements of the California Environmental Quality Act (CEQA). The Lead Agency is the Redway Community Services District (RCSD). The purpose of this Initial Study (IS) is to provide a basis for determining whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration. This IS is intended to satisfy the requirements of the CEQA (Public Resources Code, Div. 13, Sec. 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Sec 15000-15387).

CEQA encourages lead agencies and applicants to modify their projects to avoid significant adverse impacts (CEQA Section 20180(c) (2) and State CEQA Guidelines Section 15070(b) (2)).

Section 15063(d) of the State CEQA Guidelines states that an IS shall contain the following information in brief form:

- 1) A description of the project including the project location
- 2) Identification of the environmental setting
- 3) Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to provide evidence to support the entries
- 4) Discussion of means to mitigate significant effects identified, if any
- 5) Examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls
- 6) The name of the person or persons who prepared and/or participated in the Initial Study

II. PROJECT DESCRIPTION

The Redway Community Services District (RCSD, District), as Applicant, is applying to the State Water Resources Control Board (SWRCB) – Division of Water Rights to amend existing water rights, including the following three (3) components (herein collectively referred to as the “Project”):

1. **Place and Purpose of Use:** RCSD is requesting an expansion in Place of Use (POU) for an existing diversion located in the South Fork of the Eel River (SF Eel River) to include all properties located within the District's jurisdictional boundary under the respective appropriative license (Application No.: A011876; Permit No.: 007489; License No.: 003791) and an appropriative permit (Application No.: A023017; Permit No.: 015665) for the existing diversion. In total, 278.72 acres are proposed to be added to the Place of Use under the requested Petition for Change associated with License No.: 003791 (see Figure 2) and 239.42 acres under the Petition for Change associated with Permit No.: 015665 (see Figure 3). A summary of the proposed changes is described in Table 1 and the specific parcels included under the expanded POU are described in Table 2, below. The expanded POU would include the Meadows Business Park (located off Evergreen Road, east of the town core), which comprises 35 parcels, YMCA Camp Ravencliff (located north of the town core), and associated infrastructure. The Meadows Business Park as a POU under the respective appropriative license and permit has been served by the RCSD since 1998.

In addition, to correct mapping inconsistencies to align with the RCSD's jurisdictional boundary, areas served, and APNs, approximately 50.10 acres would be removed from the POU under License No.: 003791 (see Figure 2) and approximately 88.43 acres under Permit No.: 015665 (see Figure 3).

The petition also includes amending the appropriative license (License No.: 003791) to include “municipal” use as a Purpose of Use. Once approved, the appropriative license and permit would be consistent with each other in terms of Place and Purpose of Use.

2. **Petition for an Extension of Time:** RCSD has also applied for a Petition for an Extension of Time associated with the SF Eel River appropriative permit (Permit No. 015665) to include the recorded diversion from calendar year 2011 as the maximum beneficial use for the permit to ensure sufficient diversion amounts would be allowed and available to serve RCSD service connections once the future appropriative license is obtained and the unnamed spring is dedicated to instream and recreational uses.
3. **Spring Diversion Licensing and Instream Flow Dedication:** RCSD holds a third water right, which allows for diversion from an unnamed spring (Application No.: A023018; Permit No.: 015666), a tributary to the SF Eel River. RCSD is requesting the permit for the unnamed spring to be licensed by the SWRCB to retain the allocated diversion amount, although RCSD has not diverted water from the unnamed spring since 2008. As part of the Project, the RCSD is seeking to permanently dedicate their allocated diversion amount for instream use for recreational and fish and wildlife preservation and enhancement ecological and recreational purposes.

No development is proposed under the current Project, which is administrative in nature. Any development to occur subsequent to the Project would be evaluated at the time a formal application is submitted to the respective regulatory agency(ies) to determine its potential to result in potential environmental impacts and determine the feasibility of mitigation to reduce potentially significant impacts to a level of less-than-significant.

With the proposed administrative changes, there would be no increase in the amount of acres served by RCSD. The District would continue to provide water and wastewater service to its Humboldt Local Agency Formation Commission (LAFCo) jurisdictional service boundary (totaling 768 acres), in addition to its two out-of-agency service connections [YMCA Camp Ravenclyff (water and wastewater), APN: 222-222-004, 16.48 acres; and California Department of Forestry and Fire Protection (CAL FIRE) Eel River Conservation Camp (wastewater service only), APN: 222-161-002, 175.03 acres; discussed further below], for a total service area of approximately 784 acres for water service and approximately 960 acres for wastewater service.

Figures 1 through 5 show the overall project location and the specific area covered by each Project component. Figure 1, below, depicts the RCSD jurisdictional boundary, the Project area, and the proposed Place of Use. Figures 2 and 3, below, depict the current Place of Use as well as the proposed Place of Use, area to be added to the POU, and area to be removed from the POU under the Project for the license and the permit, respectively, in addition to the location of the existing point of diversion (infiltration gallery within the SF Eel River) for the river License. Figure 4, below, depicts the existing area included in the permit as well as the location of the existing point of diversion (infiltration gallery within the SF Eel River) associated with Permit No.: 015665. Figure 5, below, depicts the area included in the permit as well as the location of the existing point of diversion (unnamed stream), the confluence of the SF Eel River with the unnamed stream, and the stream reach for dedication associated with Permit No.: 015666.

As shown in Figure 6 and 7, the Project area spans multiple land use and zoning designations under the Humboldt County General Plan and Humboldt County Zoning Regulations, including lands designated and zoned uses such as residential, commercial, public facility, public, and industrial use, amongst others.

Effected Parcels

Each of the project components is administrative in nature and would not cause new development to occur on the properties included under these actions. The Purpose of Use and Extension of Time (Permit No.: 015665) would not affect the boundaries. The Licensing and Instream Flow Dedication (Permit No.: 015666) would result in a change of boundary, becoming the reach of the stream from the diversion point to the confluence of the stream to the SF Eel River (described further below). Total areas included under each of these actions are summarized below (all areas are approximate):

- Purpose of Use (License No.: 003791): 518.8 acres (see Figure 2)
- Extension of Time (Permit No.: 015665): 596.2 acres (see Figure 4)
- Licensing (Permit No.: 015666): 500.6 acres (see Figure 5)
- Instream Flow Dedication (Permit No.: 015666): 500.6 acres (see Figure 5)

Table 1, below, provides a summary of the current area associated with the appropriate rights held by RCSD, the area to be added, area to be removed and the resultant proposed area, where applicable.

Table 1. Summary of Changes Proposed for Current Place of Use (License No. 3791 and Permit No. 15665)

Water Right	Current Area (acres)	Area to be Removed (acres)	Area to be Added (acres)	Resultant Area (acres)
License No. 3791	518.8	50.3	278.7	747.3
Permit No. 15665	596.2	88.5	239.2	747.3

Table 2, after Figures 1 through 7, provides a summary of the properties, including associated APN, location, acreage, existing land use and zoning designations, and existing use and development, included under the expanded Place of Use for License No.: 003791 and Permit No.: 015665.

Figure 1. Location Map

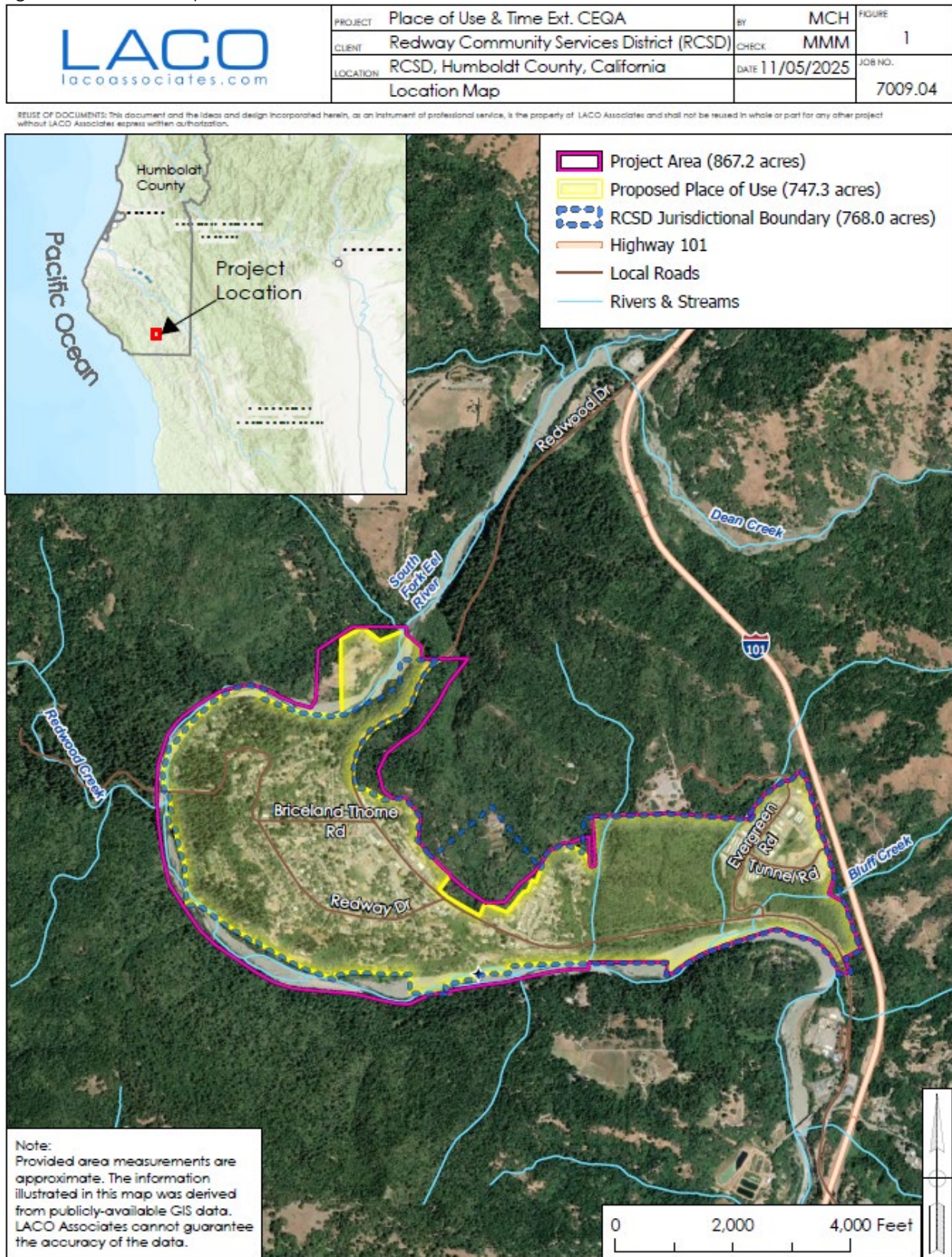


Figure 2. Petition to Change - License No. 3791

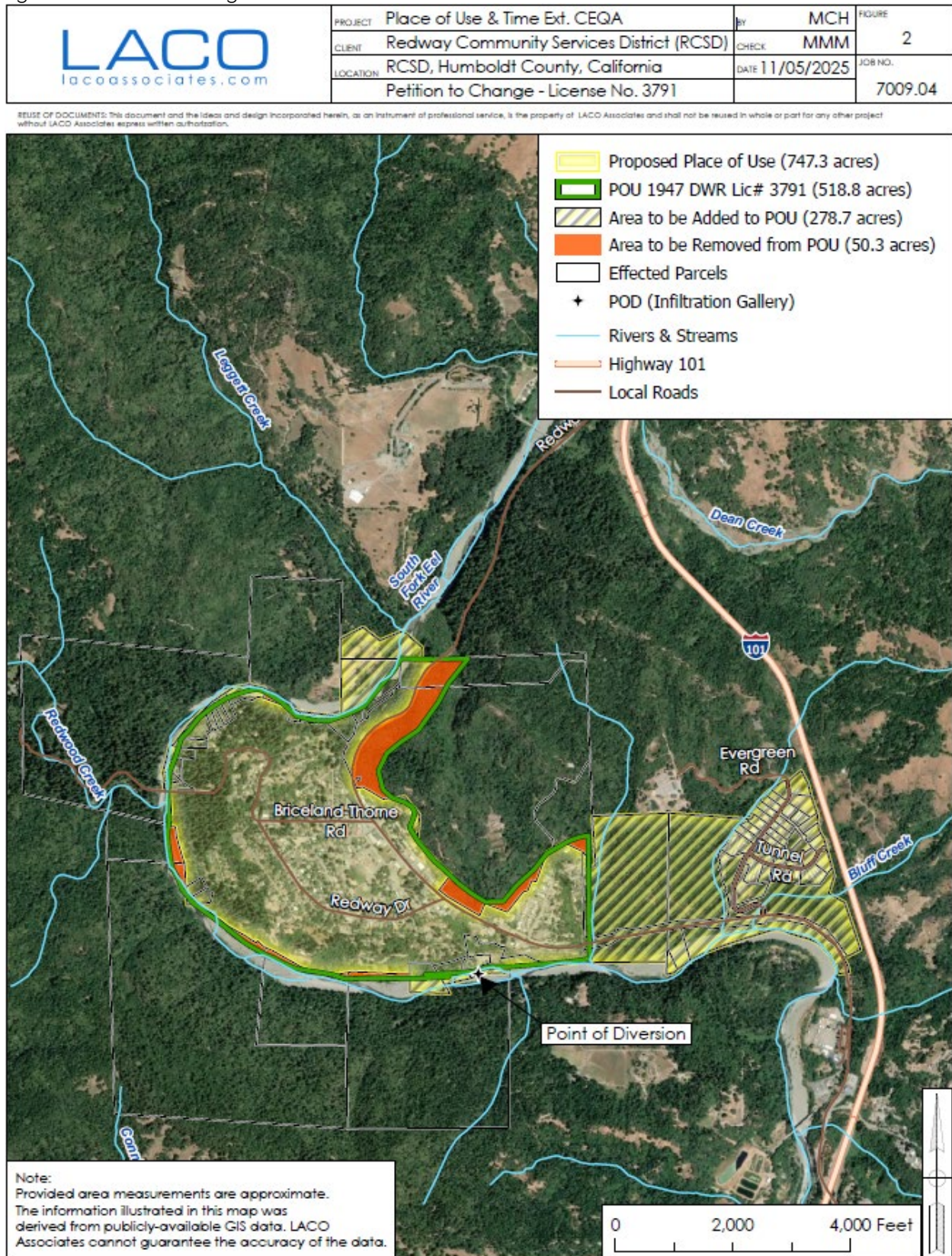


Figure 3. Petition to Change - Permit No. 15665

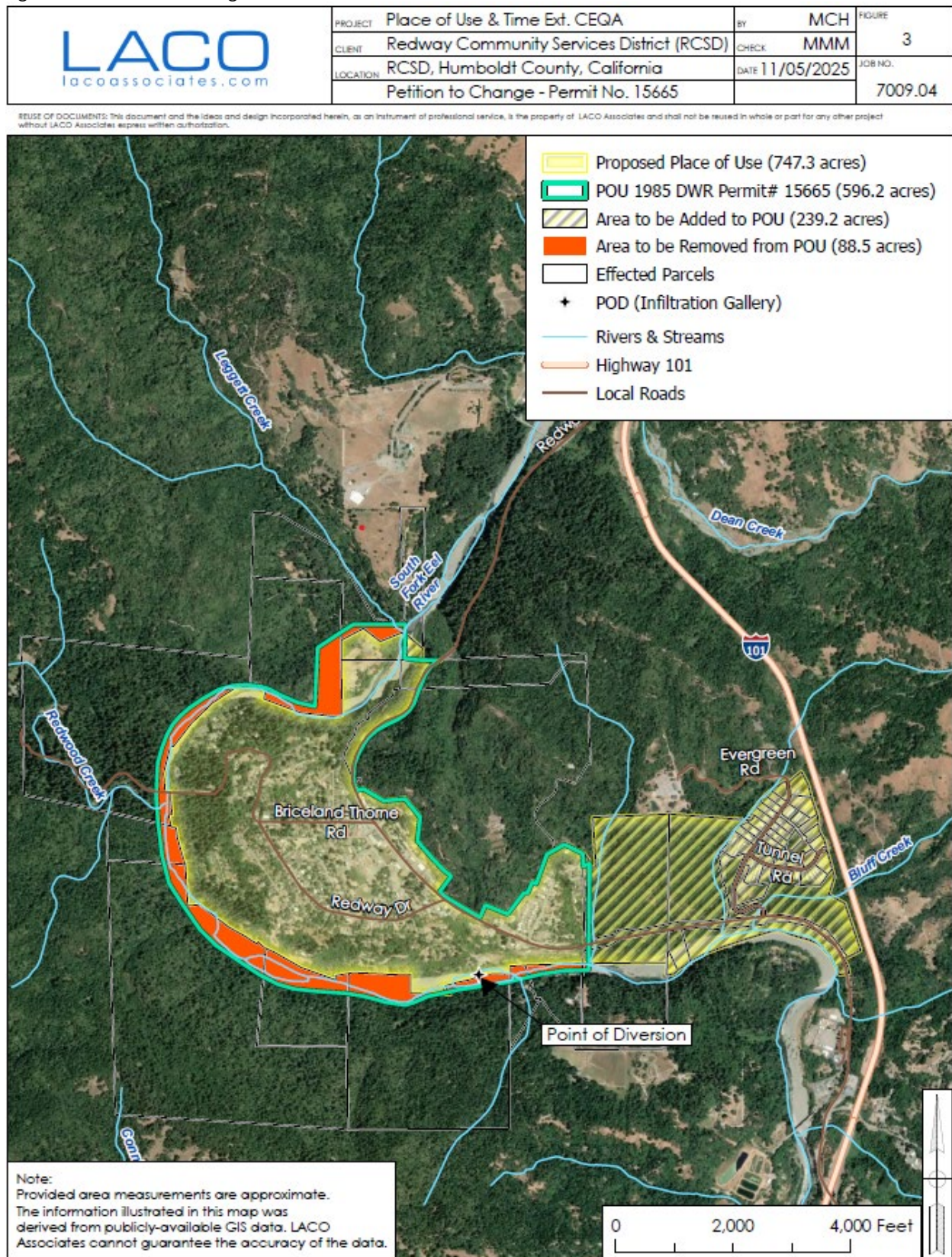


Figure 4. Petition to Extend Time – Permit No. 15665

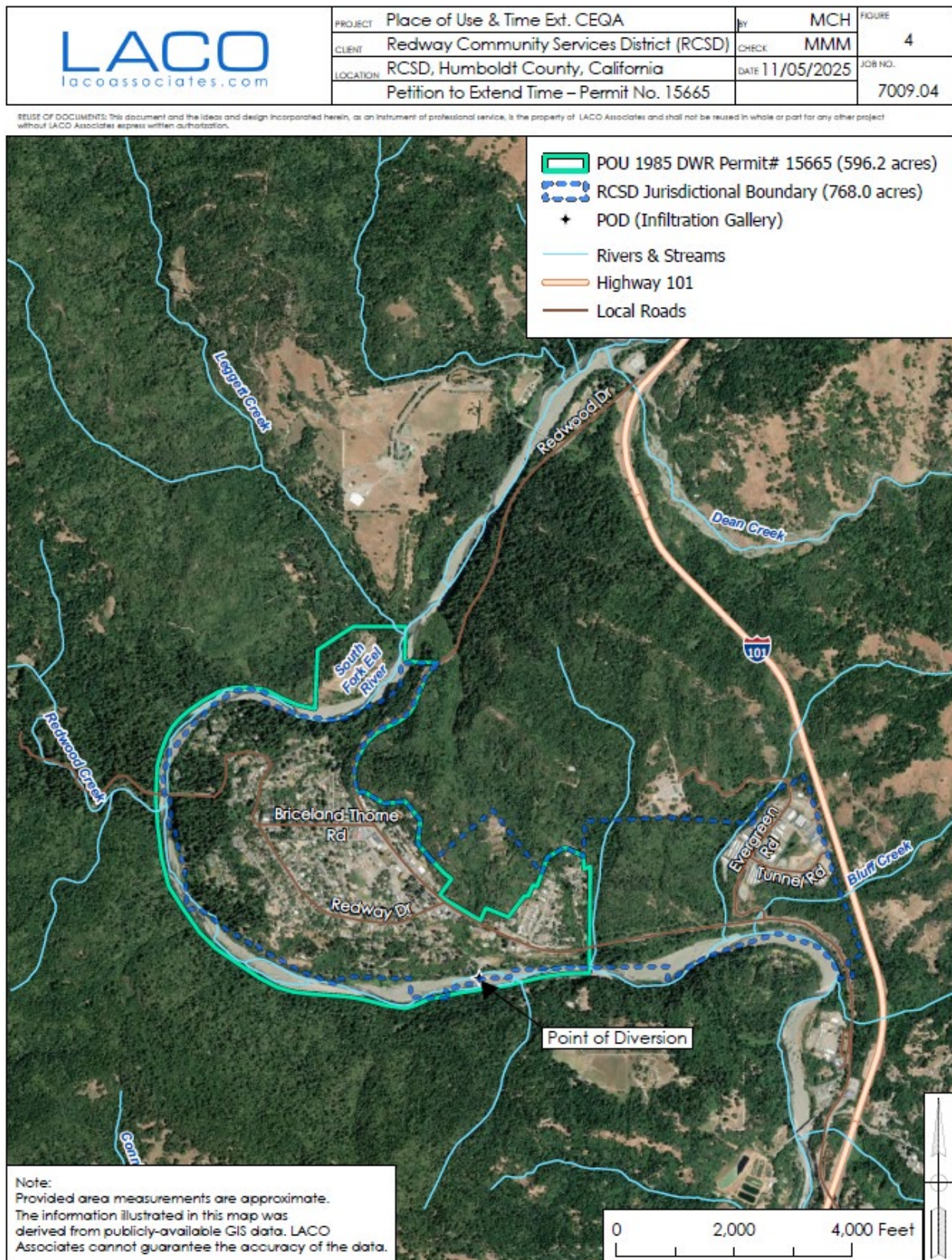


Figure 5. Petition to Dedicate – Permit No 15666

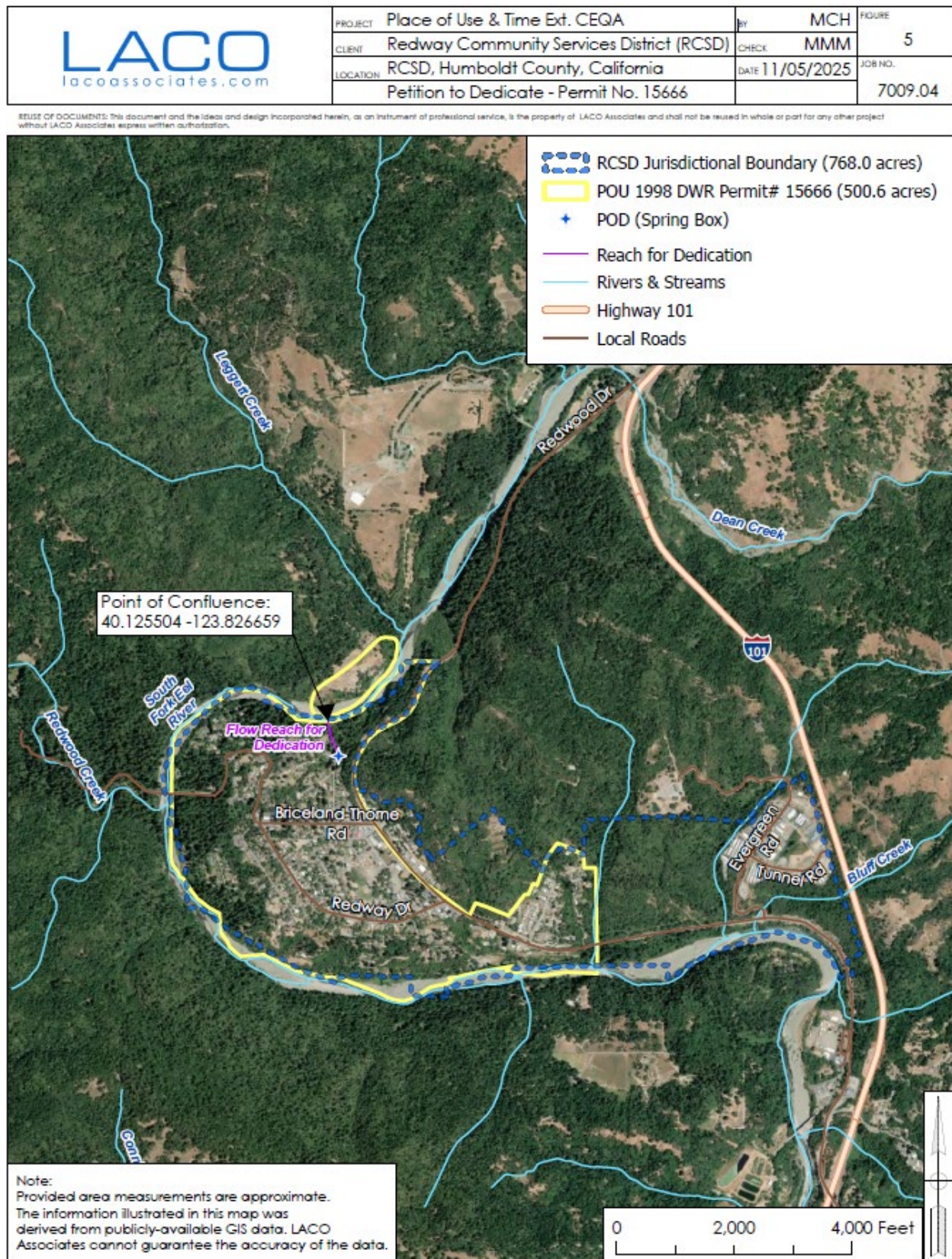


Figure 6. Land Use Designations Map

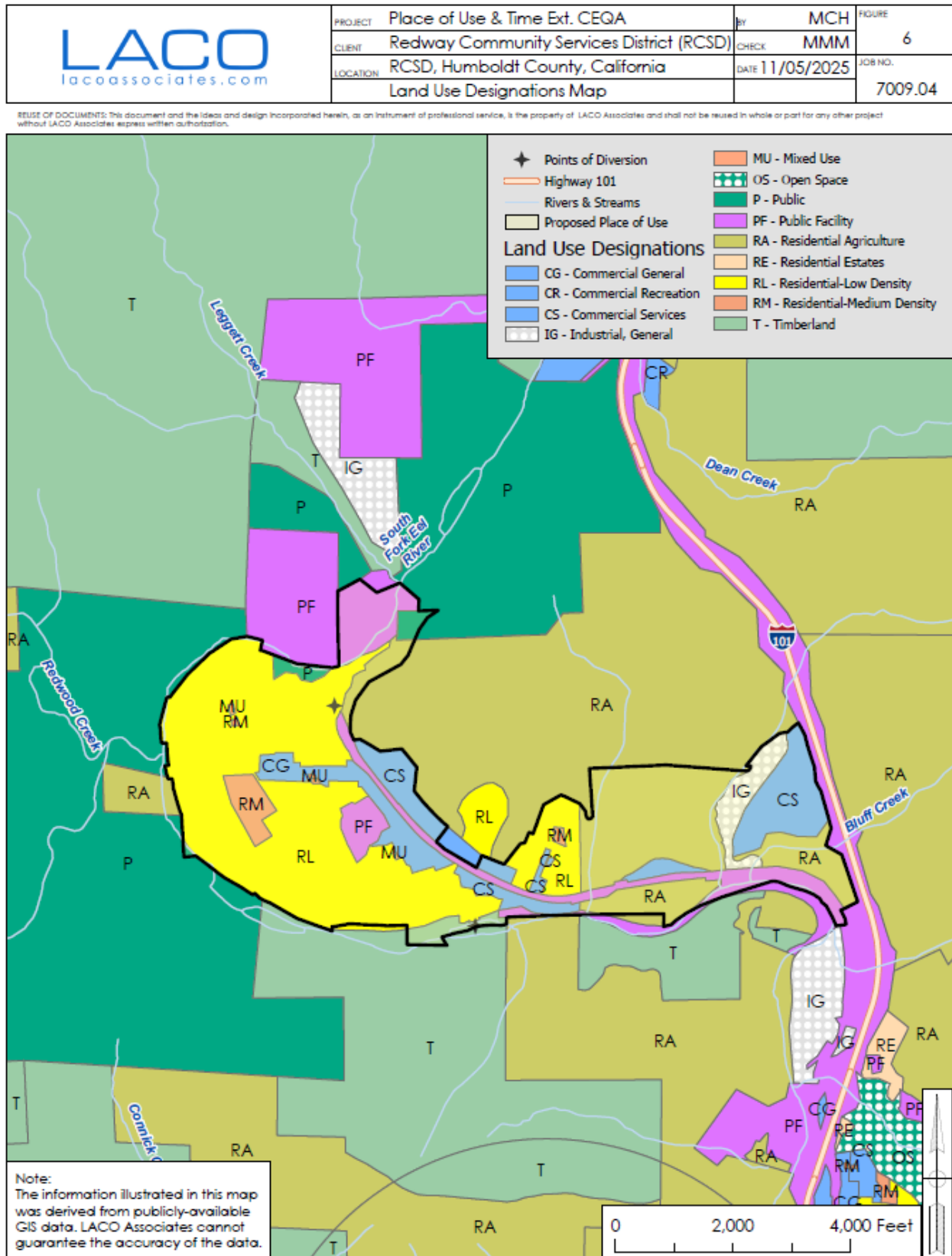


Figure 7. Zoning Designations Map

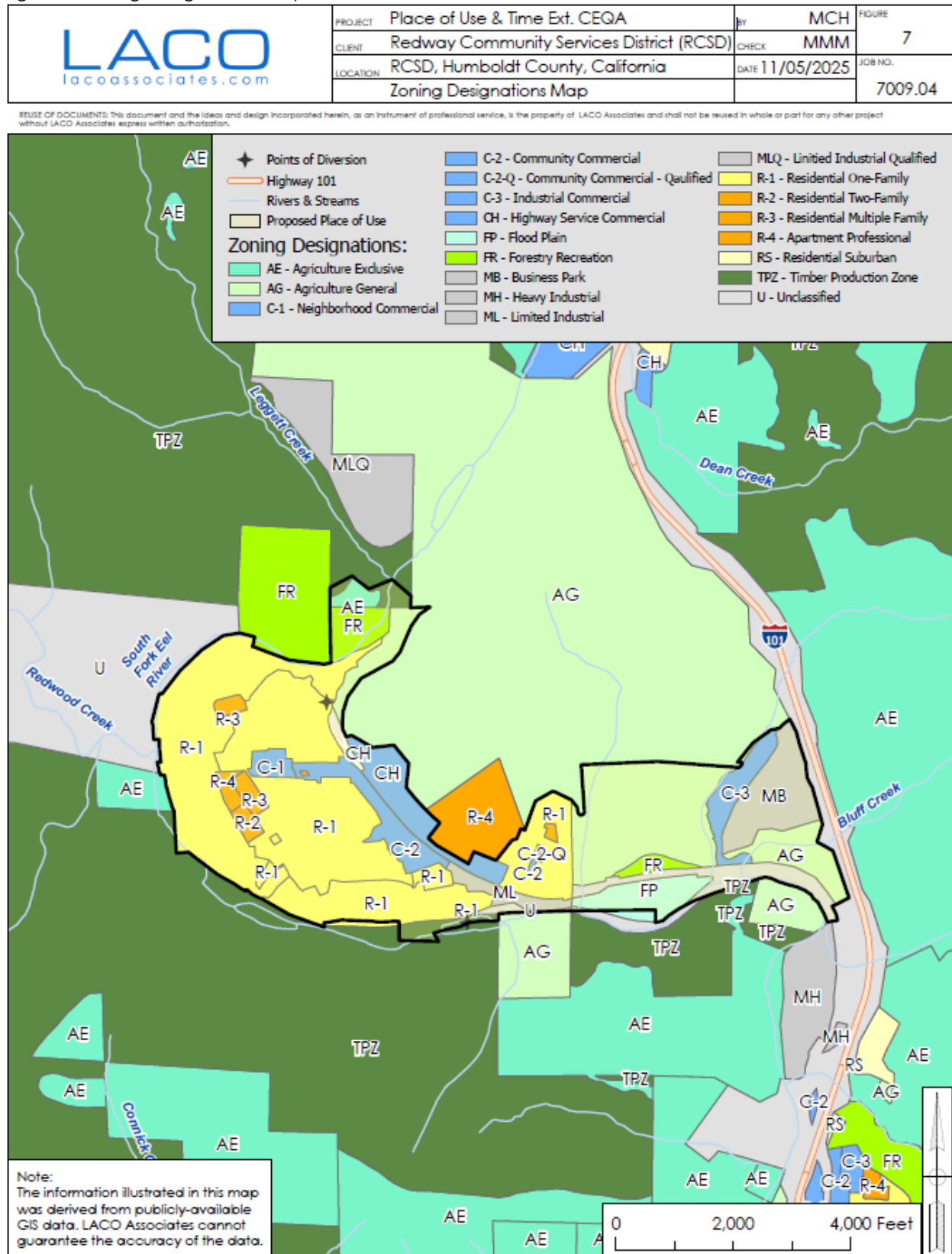


Table 2. Subject Properties included under Expanded Place of Use (License No. 3791 and Permit No. 15665)

Parcel ID	APN	Address	Land Use Designation	Zoning Designation	Existing Use/Development ¹	Parcel Size (acres)	Area (acres) to be Added to License No.: 3791	Area (acres) to be Added to Permit No.: 15665	Area (acres) to be Removed from License No.: 3791	Area (acres) to be Removed from Permit No.: 15665
Meadows Business Park Parcels (Entire Parcel to be Added to POU)										
1	223-311-003	1000 Evergreen Rd	IG	C-3-D	Improved Rural Residential, 5 to 10 acres	5.97	5.97	5.97	0.00	0.00
2	223-311-004	1100 Evergreen Rd	IG	C-3-D	Commercial (Motel, Restaurant, Service Station)	3.19	3.19	3.19	0.00	0.00
3	223-311-005	1150 Evergreen Rd	IG	C-3-D	Commercial (Multi-Tenant Shops)	1.19	1.19	1.19	0.00	0.00
4	223-311-006	1180 Evergreen Rd	IG	C-3-D	Commercial (Multi-Tenant Shops)	1.01	1.01	1.01	0.00	0.00
5	223-311-007	1210 Evergreen Rd	IG	C-3-D	Commercial (Motel, Restaurant, Service Station)	1.11	1.11	1.11	0.00	0.00
6	223-311-008	1240 Evergreen Rd	IG	C-3-D	Commercial (Multi-Tenant Shops)	1.11	1.11	1.11	0.00	0.00
7	223-311-009	1270 Evergreen Rd	IG	C-3-D	Commercial (Motel, Restaurant, Service Station)	1.03	1.03	1.03	0.00	0.00
8	223-311-010	1271 Evergreen Rd	CS	MB-D	Commercial (Multi-Tenant Shops)	1.08	1.08	1.08	0.00	0.00
9	223-311-011	1241 Evergreen Rd	CS	MB-D	Commercial (Garage)	1.11	1.11	1.11	0.00	0.00
10	223-311-012	1211 Evergreen Rd	CS	MB-D	Commercial (Multi-Tenant Shops)	1.12	1.12	1.12	0.00	0.00
11	223-311-013	1181 Evergreen Rd	CS	MB-D	Commercial (Motel, Restaurant, Service Station)	1.15	1.15	1.15	0.00	0.00
12	223-311-016	1300 Evergreen Rd	IG	C-3-D	Commercial (Multi-Tenant Shops)	1.08	1.08	1.08	0.00	0.00
13	223-311-017	1330 Evergreen Rd	IG	C-3-D	Commercial (Miscellaneous)	1.00	1.00	1.00	0.00	0.00
14	223-311-018	1380 Evergreen Rd	IG	C-3-D	Public Land, Schools, Non-Taxable Entities	1.16	1.16	1.16	0.00	0.00
15	223-311-019	1401 Evergreen Rd	CS	MB-D	Commercial (Miscellaneous)	2.4	2.40	2.40	0.00	0.00
16	223-311-022	1951 Barnett Rd	CS	MB-D	Vacant Commercial	1.16	1.16	1.16	0.00	0.00
17	223-311-023	1341 Evergreen Rd	CS	MB-D	Commercial (Warehouse)	1.04	1.04	1.04	0.00	0.00
18	223-311-024	1901 Tunnel Rd	CS	MB-D	Vacant Commercial	1.24	1.24	1.24	0.00	0.00
19	223-311-025	1841 Tunnel Rd	CS	MB-D	Vacant Commercial	1.04	1.04	1.04	0.00	0.00

Parcel ID	APN	Address	Land Use Designation	Zoning Designation	Existing Use/Development ¹	Parcel Size (acres)	Area (acres) to be Added to License No.: 3791	Area (acres) to be Added to Permit No.: 15665	Area (acres) to be Removed from License No.: 3791	Area (acres) to be Removed from Permit No.: 15665
20	223-311-026	1781 Tunnel Rd	CS	MB-D	Vacant Commercial	1.1	1.10	1.10	0.00	0.00
21	223-311-027	1870 Barnett Rd	CS	MB-D	Vacant Commercial	1.48	1.48	1.48	0.00	0.00
22	223-311-028	1901 Barnett Rd	CS	MB-D	Vacant Commercial	1.31	1.31	1.31	0.00	0.00
23	223-311-029	1911 Barnett Rd	CS	MB-D	Commercial (Miscellaneous)	1.2	1.20	1.20	0.00	0.00
24	223-311-030	1881 Barnett Rd	CS	MB-D	Commercial (Miscellaneous)	1.12	1.12	1.12	0.00	0.00
25	223-311-031	1731 Barnett Rd	CS	MB-D	Vacant Commercial	1.12	1.12	1.12	0.00	0.00
26	223-311-032	1750 Tunnel Rd	CS	MB-D	Vacant Commercial	1.59	1.59	1.59	0.00	0.00
27	223-311-035	1880 Tunnel Rd	CS	MB-D	Vacant Commercial	1.46	1.46	1.46	0.00	0.00
28	223-311-036	1930 Tunnel Rd	CS	MB-D	Vacant Commercial	1.17	1.17	1.17	0.00	0.00
29	223-311-037	1980 Tunnel Rd	CS	MB-D	Vacant Commercial	1.22	1.22	1.22	0.00	0.00
30	223-311-040	975 Evergreen Rd	CS	MB-D	Vacant Commercial	4.17	4.17	4.17	0.00	0.00
31	223-311-041	--	RA5-20	AG-B-5(5)	Vacant Commercial	24.41	24.41	24.41	0.00	0.00
32	223-311-042	2010 Tunnel Rd	CS	MB-D	Commercial (Mini-Warehouse)	2.33	2.33	2.33	0.00	0.00
33	223-311-043	--	CS	MB-D	Commercial (Miscellaneous)	2.56	2.56	2.56	0.00	0.00
34	223-311-044	1800 Tunnel Rd	CS	MB-D	Commercial (Mini-Warehouse)	2.73	2.73	2.73	0.00	0.00
35	223-311-045	1381 Evergreen Rd	CS	MB-D	Vacant Commercial	2.64	2.64	2.64	0.00	0.00
Identified Parcels Where the Entire Parcel Would Be Added to the POU (These are in Addition to the Meadows Business Park Parcels)										
36	223-171-018	--	PF	U	Rural - Vacant	17.21	17.21	17.21	0.00	0.00
37	223-171-019	--	RA40-160	FP	Rural - Vacant	4.06	4.06	4.06	0.00	0.00
38	223-171-020	--	RA40-160	FP	Rural - Vacant	1.02	1.02	1.02	0.00	0.00
39	223-171-021	--	CG; RA5-20	AG-B-5(5); FR	Rural - Vacant	40.73	40.73	40.73	0.00	0.00
Identified Parcels Where a Change Would Only Affect a Portion of the Parcel (Additive or Subtractive) to Make POU Boundary Consistent with APN Boundary										
40	077-011-010	264 Oakridge Dr	RL	R-1-B-3-Q	Improved Single Family Residential	1.89	0.26	0.00	0.00	0.00
41	077-011-012	310 Oakridge Dr	RL	R-1-B-3-Q	Improved Single Family Residential	3.65	0.76	0.00	0.00	0.00
42	077-051-001	450 Oakridge Dr	RL	R-1-B-3-Q	Improved Single Family Residential	1.41	0.30	0.00	0.00	0.00
43	077-051-010	410 Oakridge Dr	RL	R-1-B-3-Q	Improved Single Family Residential	1.20	0.21	0.00	0.00	0.00
44	077-051-011	376 Oakridge Dr	RL	R-1-B-3-Q	Residential	0.98	0.13	0.00	0.00	0.00

Parcel ID	APN	Address	Land Use Designation	Zoning Designation	Existing Use/Development ¹	Parcel Size (acres)	Area (acres) to be Added to License No.: 3791	Area (acres) to be Added to Permit No.: 15665	Area (acres) to be Removed from License No.: 3791	Area (acres) to be Removed from Permit No.: 15665
					(Licensed mobile home on fee parcel)					
45	077-051-012	344 Oakridge Dr	RL	R-1-B-3-Q	Residential (Licensed mobile home on fee parcel)	0.99	0.16	0.00	0.00	0.00
46	077-061-010	--	RL	R-1-B-3-Q	Vacant Single Family Residential	3.32	1.47	0.00	0.01	0.00
47	077-071-006	13 Eel River Ln	RL	R-1-B-3-Q	Residential (Improved, 2-4 Units)	1.74	0.63	0.00	0.00	0.00
48	077-071-009	178 Azalea Ln	RL	R-1-B-3-Q	Residential (Improved, 2-4 Units)	2.04	0.81	0.00	0.00	0.00
49	077-071-012	26 Eel River Ln	RL	R-1-B-3-Q	Public Land, Schools, Non-Taxable Entities	1.06	0.22	0.00	0.00	0.00
50	077-071-013	16 Eel River Ln	RL	R-1-B-3-Q	Public Land, Schools, Non-Taxable Entities	0.89	0.34	0.00	0.00	0.00
51	077-092-011	488 Eel River Ln	RL	R-1-B-3-Q	Residential (Improved, 2-4 Units)	1.62	0.04	0.00	0.00	0.00
52	077-092-013	538 Eel River Ln	RL	R-1-B-3-Q	Improved Single Family Residential	1.74	0.19	0.00	0.00	0.00
53	077-131-001	227 Dogwood Ln	P	R-1-B-3-Q	Public Land, Schools, Non-Taxable Entities	0.93	0.32	0.00	0.00	0.00
54	077-171-006	656 Willow Ave	RL	R-1-B-3-Q	Vacant Single Family Residential	0.96	0.15	0.00	0.00	0.00
55	077-171-008	446 Willow Ave	RL	R-1-B-3-Q	Improved Single Family Residential	3.36	0.22	0.00	0.00	0.00
56	077-171-010	241 Dogwood Ln	P	R-1-B-3-Q	Public Land, Schools, Non-Taxable Entities	1.99	1.37	0.00	0.00	0.00
57	077-281-015	--	T	TPZ	Vacant Single Family Residential	6.07	3.54	0.08	0.00	0.00
58	077-351-010	--	RL	R-1-B-3	Vacant Single Family Residential	8.75	1.84	0.00	0.00	0.01
59	077-351-014	460 Barnes Ln	T	TPZ	Improved Single Family Residential	3.91	1.65	0.00	0.00	0.00
60	222-151-001	--	T	TPZ	100% TPZ, Rdwd, Vacant	160.83	0.00	0.00	15.57	2.23
61	222-151-003	1005 Bear Canyon Rd	T	TPZ	Portion TPZ, Mix Rdwd&Wwd, Improved	49.31	0.00	0.00	0.26	0.00
62	222-151-004	--	RA40-160	FP	Rural - Vacant	13.01	12.57	12.53	0.00	0.00
63	222-151-005	--	RA5-20	AG-B-5(5)	Rural - Vacant	62.32	59.14	59.56	0.00	0.00

Parcel ID	APN	Address	Land Use Designation	Zoning Designation	Existing Use/Development ¹	Parcel Size (acres)	Area (acres) to be Added to License No.: 3791	Area (acres) to be Added to Permit No.: 15665	Area (acres) to be Removed from License No.: 3791	Area (acres) to be Removed from Permit No.: 15665
64	222-151-007	1450 Bear Canyon Rd	RA5-20	AG-B-6	Improved Rural Residential, 5 to 10 acres	10.00	0.00	0.00	1.58	0.12
65	222-151-010	1376 Bear Canyon Rd	RA5-20	AG-B-6	Improved Rural Residential, 10 to 20 acres	18.24	0.00	0.00	3.04	0.08
66	222-152-002	--	RA40	AE-B-5(40)	Rural w/ Timber Infl - Vacant	20.45	0.00	0.00	4.76	2.51
67	222-152-003	--	P	TPZ	Public Land, Schools, Non-Taxable Entities	272.14	0.00	0.00	17.54	3.84
68	222-152-004	--	T	TPZ	100% TPZ, Rdwd, Vacant	46.42	0.00	0.00	12.40	1.88
69	222-221-004	--	PF	FR-B-5(20)	Vacant Land, Subject to Exemption	77.59	0.00	0.00	16.16	0.61
70	222-221-005	--	P	U	Public Land, Schools, Non-Taxable Entities	191.87	0.00	0.00	11.80	0.34
71	222-222-002	--	P	AG-B-5(5)	Public Land, Schools, Non-Taxable Entities	31.46	0.05	0.13	0.09	5.75
72	222-222-004	2830 Briceland-Thorne Rd	PF	FR-B-5(5)	Improved, Subject to Exemption	16.48	13.87	0.00	0.00	0.00
73	222-222-006	2750 Briceland-Thorne Rd	PF	AE	Public Land, Schools, Non-Taxable Entities	12.22	12.22	2.16	0.01	0.00
74	222-222-011	--	P	TPZ	Public Land, Schools, Non-Taxable Entities	63.24	0.00	0.00	4.26	0.00
75	222-222-013	3167 Redwood Dr	RA5-20	AG-B-5(5)	Improved Rural Residential, 40+ acres	248.01	0.00	0.00	0.95	31.03
76	222-222-014	--	RA5-20	AG-B-5(5)	Vacant Rural Residential, 20 to 40 acres	22.86	0.00	0.00	0.00	1.70
Note: The road network within the Redway Community is not included in these APN based calculations. Approximate amount of roadway to be included in the total calculations are included to the right:						--	22.44	21.14	0.00	0.00
Totals=						1,511.67	278.72	239.42	88.43	50.10

Notes:

¹ Existing use and development descriptions derived from County of Humboldt Web GIS (2025).

Source: LACO Associates, 2025; Petition for Changes to Water Rights Application (4JS, 2024); and County of Humboldt Web GIS, 2025.

RCSD Background and Services

RCSD provides community water and wastewater services to residences and commercial customers located within the RCSD service boundary, which comprises approximately 768 acres (LAFCo, 2008). Additionally, RCSD provides out-of-agency service connections to two sites located northwest of the District's service boundary, but within or partially within the current Sphere of Influence (SOI). The two properties include the YMCA camp (APN: 222-222-004; 16.48 acres), located at the end of Camp Ravin Road (receives water and wastewater services) and the California Department of Forestry and Fire Protection (CAL FIRE) Eel River Conservation Camp (APN: 222-161-002; 175.03 acres), located off Transfer Station Road (receives wastewater services only). Accounting for the out-of-agency service connections, the District provides water service to approximately 784.5 acres and wastewater service to approximately 960 acres. In total, as of 2019, the District serves a total of 686 connections and a population size of approximately 1,225 residents (Humboldt LAFCo, 2023).

The Redway Water Company originally held the License for Diversion and Use of Water (Application No.: A011876, Permit No.: 007489, License No.: 003791) dated May 12, 1947, allowing diversion of 0.223 cubic feet per second (cfs) of diversion annually for domestic purposes from the SF Eel River. RCSD was formed in 1965 to provide potable water service to the community, and assets, including the licensed diversion in the SF Eel River (A011576) from the Redway Water Company were transferred to the RCSD when formed. The SF Eel River permit (A023017) and the unnamed spring permit (A023018) were obtained by RCSD in 1968. Notably, the diversion infrastructure for the unnamed spring is shown on as-builts for Highway 101 from 1933, indicating the water company had permission to divert from the spring long before 1968, when the permits were obtained. In 1977, RCSD took over wastewater services from the former Redway Sanitary District (Humboldt LAFCo, 2023). The goal of the RCSD is "to provide safe, clean, drinking water to our residents." Currently, RCSD provides water service to 100 percent and wastewater services to approximately 93 percent of households and businesses within the District, respectively (RCSD, 2025).

Currently, water supplied by RCSD's water system is derived from an infiltration gallery located on the banks of the SF Eel River (RCSD, 2025). In addition, the RCSD has water rights to utilize water from an unnamed spring. RCSD operates and maintains the following infrastructure:

- Water treatment plant, which can treat up to 365 gallons per minute (gpm) [0.53 million gallons per day (mgd)] during the winter and up to 450 gpm (or 0.65 mgd) during the summer;
- Four storage tanks totaling approximately 840,000 gallons of water storage, including: 440,000-gallon and 275,000-gallon welded steel tanks, a 100,000-gallon concrete tank that provides storage for the Meadows Business Park; and a 25,000-gallon chlorine contact time (CT) concrete tank;
- Two pressure reduction vaults;
- One booster pump station;
- Transmission and distribution lines, including approximately 30 miles of distribution piping ranging in size from 1 ½ inches to 10 inches and consisting of iron, cement, and plastic pipe (RCSD, 2025; Humboldt LAFCo, 2023).

Existing Water Rights

Currently, RCSD holds three existing water rights. Each respective water right and their associated maximum allowable diversion rates and annual allowances are described in Table 3, below.

Table 3. Summary of RCSD's Existing Water Rights

Application ID	Permit ID	License ID	Water Right Type	Status	Date Issued	Source	Maximum Allowable Instantaneous Diversion Rate (cfs)	Maximum Allowable Annual Diversion Amount (afy)
A011876	007489	003791	Appropriative	Licensed	8/17/1953	SF Eel River	0.223	161.5
A023017	015665	--	Appropriative	Permitted	7/25/1968	SF Eel River	1.050	441
A023018	015666	--	Appropriative	Permitted	7/25/1968	Unnamed Spring	0.123	52
Total Allowable Annual Diversion Amount								654.5

Source: SWRCB (eWRIMS), 2024.

As summarized in Table 3, above, RCSD currently holds two appropriative permits [Application No.: A023017; Permit No.: 015665 (SF Eel River) | Application No.: A023018; Permit No.: 015666 (Unnamed Spring)], issued on July 25, 1968, that allow for 441 acre-feet per year (afy) to be diverted from the SF Eel River and 52 afy from an unnamed spring, respectively. In addition, RCSD holds an appropriative license (Application No.: A011876; Permit No.: 007489; License No.: 003791) that allows for an additional 161.5 afy to be diverted from the SF Eel River. In total, the three water rights allow RCSD to divert a total of 654.5 afy, including 602.5 afy from the SF Eel River and 52 afy from the unnamed spring. The maximum allowable instantaneous diversion rates (in cfs) for each of the three points of diversion are also provided in Table 3. Per Table 3, the cumulative instantaneous maximum diversion rate from the SF Eel River is 1.273 cfs and 0.123 cfs from the unnamed spring.

Project Background

The original subdivision approval for the Meadows Subdivision Project included a total of 152 parcels divided into three phases (Units 1 – 3)¹ and was approved by the Humboldt County Board of Supervisors on September 26, 1978 (4JS, 2024). The Meadows Business Park (Unit 3) included 55 parcels near the community of Redway. Initially, it was proposed that two groundwater wells would supply water and the RCSD would provide wastewater services for the Meadows Business Park. Two groundwater wells and a 100,000-gallon water storage tank were installed in 1986 to serve the business park. On June 23, 1992, the Humboldt County Board of Supervisors approved a revised tentative map for Unit 2 in which water continued to be provided by the existing infrastructure.

Following approval of the tentative map in 1992, the Humboldt Local Agency Formation Commission (LAFCo) approved annexation of the Meadows Business Park into the service boundaries of the RCSD for sewer services and the Redway Fire Protection District for fire protection services through LAFCo Resolution 93-04 on September 1, 1993. This approval included adoption of a Conditional Negative Declaration (CND; SCH #93081004), which stated that water would continue to be supplied by existing wells as the primary water source. While the primary purpose of the annexation was to bring approximately 260 acres into the RCSD and Redway Fire Protection District (FPD) for wastewater and fire protection services, respectively, the annexation action did not limit or restrict the range of services authorized to be provided by RCSD within the

¹ Unit 1 (64 lots) is in Garberville and had 2 phases, Unit 2 included 33 lots, and Unit 3 (Meadows Business Park) was comprised of 55 lots and also included 2 phases (4JS, 2024).

annexation area. According to LAFCo in their letter dated May 15, 2025, the administrative record clearly shows that the Commission considered both the immediate service needs and the potential future service demands of the area. The proposal justification identified RCSD as the anticipated provider for both water and sewer services, and the supplemental information stated that annexation would enable the extension of these services along Redwood Drive (LAFCo, 2025).

Construction of the water line from West Coast Drive to the Meadows Business Park started in 1996, paused for the winter months of 1996 -1997, and resumed in 1997 (Sweet, 1997) due to production issues with the well and concerns there would not be sufficient water available to serve the business park properties. The wells have been permanently disconnected from the tank and only water treated by RCSD is used to fill the tank and serve the business park. Subsequent tentative maps and environmental review included evaluation of the water supply and supporting infrastructure.

A number of parcels (including the Meadows Business Park) were annexed into the RCSD service boundary in 1993. Between 1994 and 1998, domestic water supplied to the Meadows Business Park was provided in accordance with the Water Supply Permit (Water Permit No.: 01-01-94-P362), dated March 22, 1994, issued by the State of California Department of Health Services to the Meadows Park Property Owners Association.

Following sale and transfer of the existing water system and infrastructure to RCSD by the Meadows Park Property Owners Association in March 1998, RCSD has been providing water to Meadows Business Park through an existing appropriative license (Application No.: A011876; Permit No.: 007489; License No.: 003791 and an appropriative permit (Application No.: A023017; Permit No.: 015665), although the POU associated with the water rights were inadvertently not updated to include the subject properties.

Prior to 2008, RCSD was diverting water from the unnamed spring and the SF Eel River to meet water demand. The spring water was previously chlorinated at the diversion site and then transported to a storage tank (no longer existing) for use within the RCSD water system. In 2008, the spring box fell into disrepair and SWRCB standards for treatment of surface water changed, causing the spring to be classified as surface water. Due to the change in regulations, RCSD would need to process the spring water through a treatment plant meeting surface water standards instead of just chlorinating the water. However, a facility could not be built within the footprint of the property. RCSD ceased diverting water from the spring and began diverting additional water from the SF Eel River infiltration gallery to compensate for the lost spring production.

California Department of Fish and Wildlife (CDFW) Permitting

On March 7, 2025, RCSD submitted a Lake or Streambed Alteration Agreement (LSAA) Notification to the California Department of Fish and Wildlife (CDFW) to request a Standard Agreement for a period of five years (2025-2029) for ongoing diversion of raw water from the RCSD's intake infrastructure within the SF Eel River at RCSD's Surface Water Treatment Plant, located at 546 Barnes Lane in Redway (APN: 077-351-011). Per the March 2025 Notification, in addition to the treatment plant, the associated infrastructure includes the under-ripped infiltration gallery pipes (located on APNs: 077-351-010 and 222-151-001) and pump station and wet well (located on APN: 077-351-001). As stated on the Notification, the point of diversion's maximum allowable diversion rate is 1.273 cfs, but the pumps located in the wet well have a maximum instantaneous rate of 450 gpm, resulting in a lower diversion rate than allowed. The lowest level of flow in the river during the proposed season of diversion is typically under 30 cfs annually while the actual number greatly varies depending on climate conditions. It is not uncommon in the last decade for the lowest level of flow to drop below 20 cfs. Furthermore, the annual diversion amount anticipated in 2025 is specified as approximately 174.67 afy, which is below the maximum combined diversion amount of 602.5 afy permitted under the appropriative license (License No.: 003791) and appropriative permit (Permit No.: 015665).

To minimize cumulative impacts to listed fish and wildlife, the RCSD will not divert more than 5 percent of streamflow as measured at the USGS gauging station at Miranda. To meet this requirement, RCSD proposes to calculate the maximum diversion amount on a 24-hour basis instead of instantaneous basis, due to the operational limitations of the pumps at the treatment plant, which is described in more detail in the following paragraphs.

RCSD's water treatment plant contains numerous stages of treatment, each of which is sized to perform at a set range of flows. This infrastructure cannot be operated at flow rates that are outside of their designed ranges. The details of these capacities were included in the *RCSD Water and Wastewater Capacity Analysis* report prepared by Waterworks Engineers dated September 8, 2014. RCSD upgraded the water plant in 2009 with new raw water pumps. The raw water pumps have a maximum capacity of 450 gpm. For normal operations, the pumps are run at 350 gpm and the number of minutes they run each day varies based upon the consumption for that day. Under unusual circumstances, such as the river water having high turbidity or when water conservation stages have been declared, the plant can be recalibrated to run at a slightly slower speed. The lowest that the plant has ever run at for more than a few minutes is 250 gpm. RCSD will decrease the instantaneous simultaneous pumping rate to match the 5 percent on an instantaneous basis until the river flow reaches 11.15 cfs, but when the river falls below that flow rate, RCSD will set the pumping rate at 250 gpm and monitor the number of minutes pumped in a 24-hour period to ensure diversion rates stay under 5 percent of the river's flow during that same 24-hour period.

For example, if the Miranda gauge reads 5 cfs, then the maximum daily diversion amount at 5 percent would be 21,600 cubic feet per day (or 323,158 gallons per day (gpd)) based upon 0.25 cfs multiplied by 24 hours. RCSD will divert this amount at a rate of 250 gpm for a total of 646 minutes (10.76 hours) per day. This results in the same amount of water being diverted from the river over a 24-hour period. While 250 gpm is more than 5 percent of the instantaneous river flow rate, by pumping for less than the entire 24 hours, RCSD would divert less than the requested 5 percent maximum on a 24-hour basis. This difference has a significant effect on the viability of operating the treatment plant at a lower diversion amount while not destroying the pumps nor sacrificing the protection of the fish and aquatic species.

Because the USGS gauging station at Miranda provides real-time numbers that are provisional and sometimes change when the station master recalibrates the gauge, RCSD will keep records of what USGS was reporting each day which will inform the operator on how to calculate the total amount that can be diverted that day. These records will also show the pumping rate, amount of time pumps ran, and the total amount diverted each day. Records each year will begin to be created when the river flow is at or below 30 cfs.

As of the date of this document, a draft LSAA has been issued by CDFW and the RCSD and CDFW are working together to finalize the agreement.

Project Objectives

Overall, the proposed Project seeks to ensure consistency among RCSD's appropriative rights and ensure the rights accurately reflect uses. More specifically, there are several objectives for the Project as follows:

- Ensure consistency between the SF Eel River license (Application No: A011876; Permit No.: 007489; License No.: 003791) and permit (Application No.: A023017; Permit No.: 015665) in terms of place and purpose of use;
- License the river permit (Application No.: A023017; Permit No.: 015665);
- License the spring diversion (Application No.: A023018; Permit No.: 015666);
- Dedicate the spring diversion (Application No.: A023018; Permit No.: 015666) for recreational and fish and wildlife preservation and enhancement and recreational purposes.

Additional information on each of the respective Project components is provided in the following subsections.

Project Components

Additional details pertaining to the Project components are provided below. Please note that no development is proposed under the Project nor would the Project result in increased water withdrawal.

Change in Place and Purpose of Use

A Petition for Changes to Water Rights was submitted to the SWRCB in August 2024 (Petition No.: 457925) to request a change in Place of Use for two existing water rights to include all parcels currently receiving water service from RCSD, in accordance with Water Code Section 1701 and California Code of Regulations (CCR) Title 23, Section 791 through 799. The existing water rights include an appropriative license (Application No.: A011876; Permit No.: 007489; License No.: 003791) and an appropriative permit (Application No.: A023017; Permit No.: 015665). Additionally, the Petition for Changes to Water Rights is requesting adding 'municipal' use as a Purpose of Use to the appropriative license (Application No.: A011876; Permit No.: 007489; License No.: 003791). As defined by CCR Title 23, Section 663, municipal use means the use of water for the municipal water supply of a city, town, or other similar population group, and use incidental thereto for any beneficial purpose. The addition of municipal use to the appropriative permit will more accurately reflect the Purpose of Use of the water and will be consistent with the Purpose of Use described on the appropriative permit (Application No.: A023017; Permit No.: 015665). By amending the Place of Use for both the license and the permit and the Purpose of Use for the license, the appropriative rights held by the RCSD will be consistent with each other and with the ongoing uses.

Parcels to be added include the Meadows Business Park and YMCA Camp Ravencliff, which are currently served by RCSD. As previously described, RCSD is requesting the addition of 278.72 acres to the Place of Use under License No.: 003791 (see Figure 2) and the addition of 239.42 acres under Permit No.: 015665. In addition, parcels are proposed for removal from the Places of Use, including 50.10 acres under License No.: 003791 (see Figure 2) and 88.43 acres under Permit No.: 015665.

These parcels being removed and many of the portions of parcels being added is largely due to the change in historic water right mapping practices, in which mapping based on watershed features such as the center of stream line (as was done here) is being converted to a more modern delineated area that lines up more closely with designated APN boundaries. This more accurately reflects parcels that are currently served by the RCSD and/or proposed to gain access to water service under this Project. In addition, no RCSD utilities or infrastructure exist nor are in operation on the west side of the SF Eel River, so these mapping updates correct these current inconsistencies.

As described in the Petition, both water rights are diverted from a single infiltration gallery located in the SF Eel River, where water is treated and distributed throughout the RCSD service area. There are several parcels (see Table 4, below) that were annexed into the RCSD service boundary in 1993 and have been served with community water service by RCSD since 1998. However, RCSD's water rights were inadvertently not amended to include the additional properties into their Places of Use. By adding the additional properties into the Places of Use, the license and permit would be consistent with each other and would properly define where the diverted water is utilized.

Records indicate that a Water Supply Permit (Water Permit No.: 01-01-94-P362), dated March 22, 1994, was issued by the State of California Department of Health Services to the Meadows Park Property Owners Association to supply water for domestic purposes to the Meadows Business Park. It appears that water

supplied to the Meadows Business Park was provided under the Water Supply Permit until sale and transfer of the existing water system and infrastructure from the Meadows Park Property Owners Association to the RCSD occurred on March 16, 1998.

As previously discussed, and summarized in Table 3, above, two existing water rights allow RCSD to divert a total of 602.5 afy from the SF Eel River. Specifically, RCSD's appropriative license (Application No.: A011876; Permit No.: 007489; License No.: 003791) allows for a maximum of 161.5 afy to be diverted from the SF Eel River, with the appropriative permit (Application No.: A023017; Permit No.: 015665) allowing for an additional 441 afy to be diverted from the SF Eel River. Based on records on file with the SWRCB dating back to 1985, RCSD reported the following amounts of water diverted from the SF Eel River on an annual basis, summarized in Table 4. The table also shows the highest month of diversion in each year and the amount of water diverted (in acre-feet (af)) during that month.

Table 4. Annual RCSD Diversion Amounts from SF Eel River

Year	Annual Diversion Amount (afy)		Month of Highest Diversion (Permit and License)	Monthly Diversion (Permit and License) (af)	Total Annual Diversion (afy)	Exceeded Allowable Amount (602.5 afy)?
	Appropriative Permit (015665)	Appropriative License (003791)				
2011	90.73	161.5	August	34.25	252.23	No
2010	68.59	161.5	July	26.81	230.09	No
2009	82.51	161.5	July	26.53	244.01	No
2008	53.00	161.5	July	33.10	214.50	No
2007	34.00	161.5	August	26.68	195.50	No
2006	40.01	161.5	September	29.59	201.51	No
2005	18.26	161.5	August	26.64	179.76	No
2004	26.01	161.5	July	34.19	187.51	No
2003	10.35	161.5	July	29.25	171.85	No
2002	43.23	161.5	July	30.38	204.73	No
2001	52.13	161.5	June	28.85	213.63	No
2000	52.13	161.5	July	30.08	213.63	No
1999	44.76	161.5	July	30.38	206.26	No
1998	34.94	161.5	August	31.61	196.44	No
1997	31.26	161.5	July	30.69	192.76	No
1996	66.86	161.5	July	12.75	228.36	No
1995	57.04	161.5	July	9.69	218.54	No
1994	51.82	161.5	July	11.2	213.32	No
1993	28.46	161.5	August	9.4	189.96	No
1992	30.00	161.5	August	10.05	191.50	No
1991	37.4	161.5	July	8.6	198.90	No
1990	30.34	161.5	July	8.8	191.84	No
1989	63.18	161.5	July	9.3	224.68	No
1988	46.6	161.5	July	10.4	208.1	No
1987	41.69	161.5	August	11.0	203.19	No
1986	43.84	161.5	July	10.5	205.34	No
1985	46.30	161.5	July	10.9	207.80	No

Source: SWRCB, 2025[a]; and 4JS Consulting, 2025 (RCSD Monthly Diversion Data).

Per Table 4, the amount of water diverted under the appropriative license annually is reported at 161.5 afy, although the amount diverted under the appropriative permit varies. While both water rights may be utilized

and diversion may occur simultaneously at a combined rate of 1.273 cfs, RCSD must always show the entire face value of the license was utilized before indicating water use under the permit.

Please note that all reported annual diversion amounts are below the maximum amounts authorized by the SWRCB under the appropriative permit and license. Since RCSD has been serving the Meadows Business Park for almost three decades (since 1998), there would be no net increase in water diversion associated with the requested modification to the Places of Use associated with the appropriative permit and license to include the Meadows Business Park.

Recent diversion amounts under the appropriative permit and license for the SF Eel River are less than one-third of the total allowable annual diversion amounts currently authorized by the SWRCB (602.5 afy). With the additional use and expanded Place of Use, RCSD will continue to monitor monthly and annual diversion amounts to ensure the SWRCB-authorized diversion amounts under the appropriative permit and license are not exceeded. As part of the Project, the RCSD is requesting that the description of the beneficial uses for the permit and license be made consistent – domestic and municipal.

Extension of Time

A Petition for an Extension of Time was submitted to the SWRCB in August 2024 (Petition No.: 457953) for an appropriative permit (Application No.: A023017; Permit No.: 015665) for the diversion of water from the SF Eel River. An Extension of Time, for the purposes of this project, is requested for purposes of documenting the recorded historical yearly maximum diversion data to use as a basis for the future appropriative license currently being sought by the RCSD for their SF Eel River diversion permit. The RCSD is requesting a 17-year extension so data from 2011 may be utilized as a basis for determining maximum allowable diversion rates for the requested license.

The maximum diversion before the expiration of the appropriative permit for the SF Eel River occurred in 1995 where the maximum annual total amount of water diverted was recorded as 300.184 afy (including 161.500 afy under the License No.: 003791 and 63.178 afy under Permit No.: 015665; see Table 4) plus 65.645 afy from the unnamed spring (under Permit No.: 015666; see Table 5, below). The maximum 30-day average diversion rate from Years 1992 – 2008 is 24.87 af. Prior to 2008, RCSD was diverting water from the unnamed spring and the SF Eel River until the spring box fell into disrepair and treatment requirements changed from the SWRCB. At this time, diversion from the spring ceased and RCSD's water supply was fully derived from the SF Eel River. Since discontinuing the use of the spring as a water source, all water to supply customers within their service boundaries is derived from the river. Based on population data, the community does continue to grow, although slowly, at approximately 0.5 percent per year, on average. As a result, the quantity of water needed has increased. However, due to conservation efforts over the past decade, water consumption within the community has remained the same even while additional customers are added. The maximum beneficially used diversion through the SF Eel River infiltration gallery occurred in 2011, where all water used by customers (252.23 afy; see Table 4) was derived from the river, 161.5 afy and 90.73 afy under the appropriative license and permit, respectively. Notably, this usage accounted for approximately 42 percent of the total allowed diversion amount (602.5 afy) in accordance with the appropriative water rights issued by SWRCB, indicating the total amount of water allowed for diversion is not beneficially used by the RCSD. As such, the RCSD is requesting Permit No.: 015666 be licensed for 90.73 afy to reflect the maximum amount of water beneficially used (252.23 afy, when combined with License No. 003791).

Through the requested Extension of Time, the RCSD is requesting the permit be extended to 2011 to allow for the highest diversion rate of 252.23 afy (with no diversion from the unnamed spring) be utilized to ensure sufficient diversion amounts would be allowed once the future appropriative license is obtained. Please note no net increase in water diversion would occur, as this is the maximum highest diversion rate recorded since

cessation of the use of the unnamed spring, and conservation efforts have since reduced diversion amounts. This will ensure sufficient allowable diversion amounts are available via the SF Eel River infiltration gallery through the RCSD's water rights to serve the needs of the community and future anticipated water connections, especially since this is the only water source currently serving the Redway community.

Unnamed Spring Diversion Licensing and Instream Flow Dedication

The third water right held by the RCSD allows for diversion from an unnamed spring (Application No.: A023018; Permit No.: 015666), which is tributary to the SF Eel River. Under the Project, RCSD is requesting the permit for the unnamed spring be licensed by the SWRCB. The unnamed spring has been identified as a critical cold-water source for the SF Eel River, particularly during low-flow periods, which benefits local salmon populations. The unnamed spring also feeds a scenic waterfall into the SF Eel River (Redheaded, 2024).

As indicated by the SWRCB, "Acquisition of a post-1914 appropriative water right consists of two main phases: (1) Permitting and (2) Licensing. Permitting is the process of filing an application to request that the State Water Board authorize the development of a water diversion project by issuing a permit. A permit provides the legal authorization to develop the project and divert water in accordance with conditions and within a time schedule. Licensing is the process of reviewing a permitted project that is complete to confirm the amount of water put to beneficial use and that the permit conditions were met. A license is the final confirmation of the water right and remains effective as long as its conditions are met and beneficial use continues" (SWRCB, 2025[a]).

The Permit for Diversion and Use of Water was filed on April 5, 1968, by the RCSD for purposes of providing municipal and domestic water derived from an unnamed spring, noted as a tributary of the SF Eel River thence the Eel River, a designated Wild and Scenic River. The 1968 documentation indicates that the water appropriated shall be limited to the quantity which can be beneficially used and shall not exceed 0.123 cubic feet per second (cfs) by direct diversion to be diverted from January 1 to December 31 of each year. Per the Order Approving a New Development Schedule and Amending Permit, dated May 2, 1975, the total annual diversion and use allowed under the permit was limited to 52 afy. As noted above, while the RCSD diverted water from the unnamed spring and the SF Eel River prior to 2008, diversion from the spring ceased in 2008 when the spring box fell into disrepair and treatment requirements changed from the SWRCB. After ceasing use of the spring, RCSD obtains its water supply fully from its SF Eel River diversion.

Historical data from 1981 to 2008 indicates that diversions from the unnamed spring have ranged between approximately 31.27 afy (2008) up to a maximum recorded diversion amount of 78.58 afy (1993), as summarized in Table 5, below.

Table 5. Annual RCSD Reported Diversion Amounts from Unnamed Spring (Permit No. 015666)

Year	Annual Diversion Amount (afy)	Month with Highest Diversion	Highest Diversion Month Amount (af)	Exceeded Allowable Amount (52 afy)?
2008	31.000	January	6.36	No
2007	39.100	May	5.89	No
2006	MISSING	MISSING	MISSING	No
2005	51.375	April	2.37	No
2004	49.263	March	2.10	No
2003	47.667	April	2.18	No
2002	48.803	January	1.77	No
2001	46.348	February	1.3	No
2000	50.338	April	1.6	No
1999	83.180	March	3.0	Yes
1998	84.408	March	2.8	Yes
1997	73.051	January	3.1	Yes
1996	55.556	March	2.8	Yes
1995	81.645	April	2.8	Yes
1994	71.516	March	2.5	Yes
1993	78.576	March	2.7	Yes
1992	77.348	March	5.8	Yes
1991	60.467	April	2.2	Yes
1990	67.219	May	2.3	Yes
1989	65.685	April	2.2	Yes
1988	69.982	January	2.7	Yes
1987	72.437	March	2.5	Yes
1986	65.685	March	2.3	Yes
1985	62.922	January	2.1	Yes

Source: 4JS Consulting, 2025 (RCSD Monthly Diversion Data).

As shown in the table above, the years when the unnamed spring diversion was utilized, annual diversion amounts sometimes exceeded the maximum allowable diversion limit (52 afy) established by the SWRCB under the appropriative permit. The maximum 30-day average direct diversion rate from Years 1992 – 2008 is 6.3 af. Please note, RCSD does not have plans to reinstate use of the spring diversion at this time. RCSD notes that it currently lacks the infrastructure needed to treat and store water from the spring. Any future diversion from the unnamed spring would require approval from respective regulatory agencies (Redheaded Blackbelt, 2024). Instead, as of May 2025, RCSD is proposing to permanently dedicate the spring diversion allocation for fish habitat conservation and recreational use and has prepared a respective application for delivery to the SWRCB. With this change, RCSD will continue to solely rely on its allowable diversions from the SF Eel River and will continue to not divert water from the unnamed spring.

RCSD is proposing to submit a Petition for Instream Flow Dedication under Water Code Section 1707 to the SWRCB to formally transfer the allowable diversion amount for instream use under the Section 1707 once the SWRCB's California Water Accounting, Tracking, and Reporting System (CalWATRS) portal is fully operational. RCSD anticipates the Petition for Instream Flow Dedication will be submitted to the SWRCB via the CalWATRS portal in January 2026. RCSD is also considering removal of the diversion infrastructure since use of the point of diversion would not be reinstated. As of the date of this Initial Study, RCSD is exploring potential grants and funding options to assist with potential future removal of the diversion infrastructure.

RCSD Annual Water Use

RCSD's annual water use associated with the diversions from the SF Eel River and unnamed spring in accordance with the three existing water rights are summarized in Tables 4 and 5, above. As previously described, annual allowable water diversions from the SF Eel River have not exceeded the allowable amount (602.5 afy) for each year reported. Although historical use of the unnamed spring generally exceeded the allowable diversion amount (52 afy) per year, except for the three last reporting years when the spring was utilized (2006-2008), use of the spring diversion ceased in 2008 and the RCSD has no plans to reinstate use of this diversion.

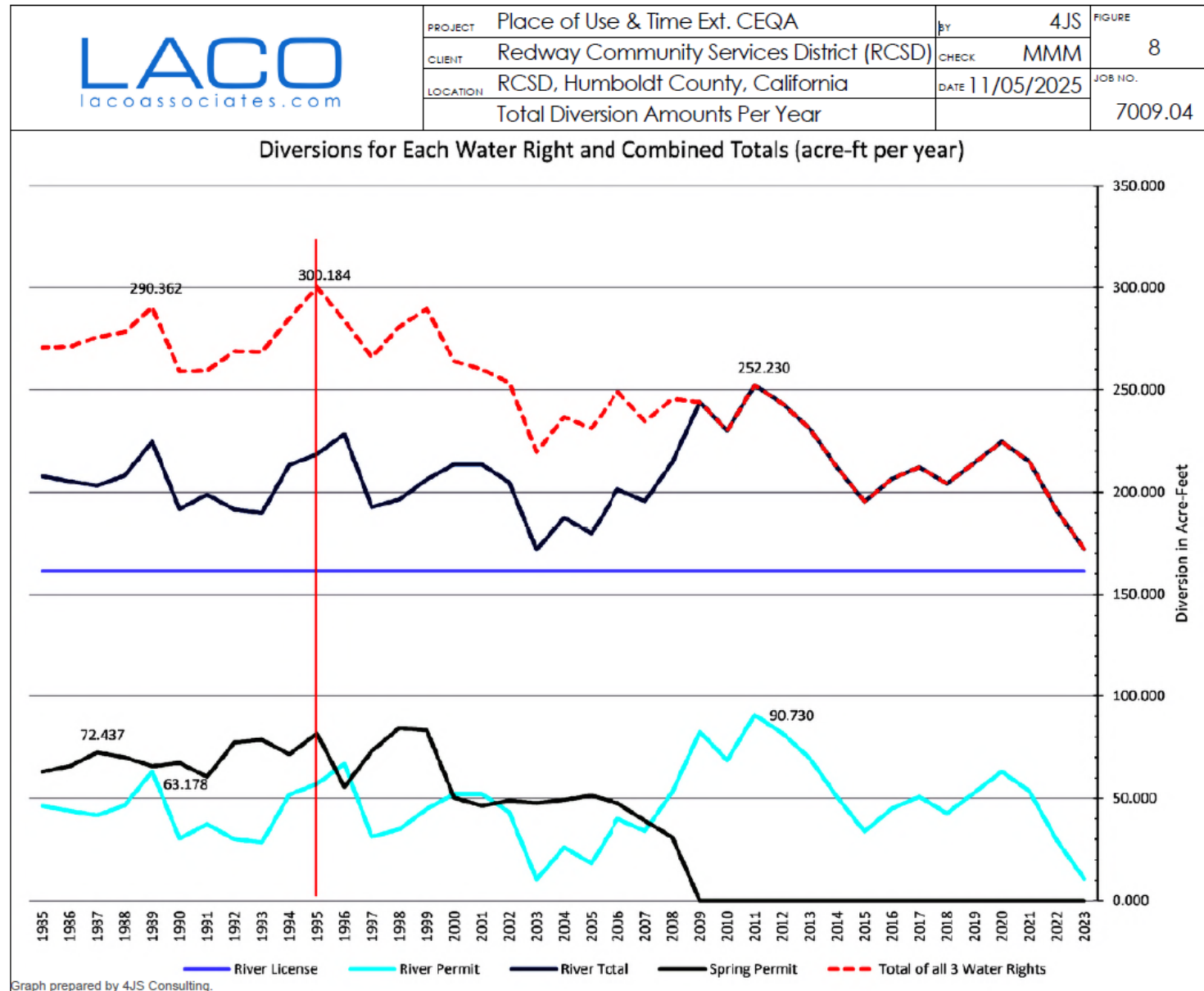
A graph showing the diversion amounts each year (from 1985 to 2023) by water right and the total diverted each year under the three water rights from the SF Eel River watershed is provided in Figure 8. Per Figure 8, the overall downward trend of diversion amounts, as shown by the red dotted line (total of all three water rights), is evident. Water conservation measures implemented by the RCSD in accordance with the adopted Water Conservation Ordinance 2018-01 has aided in minimizing water consumption within the community, especially during drought years and low-flow periods.

III. PROJECT SETTING AND LOCATION

The Project area is located in southern Humboldt County, California, and includes the unincorporated community of Redway, including area further to the north and west of the town core, totaling approximately 862.2 acres (see Figure 1). As previously described, the Project includes the addition of approximately 278.72 acres to the Place of Use for License No.: 003791 (see Figure 2) and 239.42 acres to the Place of Use for Permit No.: 015665 (see Figure 3). Areas to be added to the Places of Use include the Meadows Business Park (located off Evergreen Road, east of the town core), YMCA Camp Ravenclyff (located north of the town core), and associated infrastructure. In addition, to correct mapping inconsistencies to align with the RCSD's jurisdictional boundary, areas served, and APNs, approximately 50.10 acres would be removed from the POU under License No.: 003791 (see Figure 2) and approximately 88.43 acres under Permit No.: 015665 (see Figure 3). With the proposed changes in Place of Use, a total of 747.3 acres would be served under the existing water rights by RCSD under the proposed Place of Use. Additionally, Petition to Extend Time associated with Permit No.: 015665 has been submitted to the SWRCB for approximately 596.2 acres, which includes the town core and YMCA camp (see Figure 4).

The Project area includes a variety of uses. Within the developed community core includes a mix of residential, commercial, recreational (such as the Mateel Community Center, Southern Humboldt Little League fields, and YMCA Camp Ravenclyff), and educational (including the Redway Elementary School and Head Start Program) uses, with undeveloped and/or forested areas along the periphery and dividing the town core and the Meadows Business Park, located further to the east. The Meadows Business Park includes a variety of commercial and industrial uses, in addition to a selection of parcels (12 total; APNs: 223-311-018, -024, -025, -026, -027, -028, -031, -032, -036, -037, -041, and -045) that have not been developed and/or are currently vacant and not yet served with community water service from the RCSD. Six additional properties within the Project area (APNs: 222-151-004, -005, 223-171-018, -019, -020, and -021) have also been identified as undeveloped and/or not served by RCSD for water service (see Tables 2 and 9). At this time, no known development is proposed on the properties, nor is any development proposed under the Project. As previously noted, any development to occur subsequent to the Project would be evaluated at the time a formal application is submitted to the respective regulatory agency(ies) to assess potential environmental impacts pursuant to CEQA. Notably, development of some of the undeveloped properties is likely cost prohibitive due to site constraints, such as steep slopes. However, for the purposes of this Initial Study, potential

Figure 8. Total Diversion Amounts Per Year



future development of these properties is considered with respect to the properties' current land use and zoning designations and associated allowable uses, although future development of these properties is entirely speculative at this time.

Project Setting

As shown in Figure 1, the SF Eel River wraps around the northern, western, and southern portions of Redway and is partially included within the Project area. The Project area is also bisected by five additional watercourses, including Bluff Creek and four that are unnamed. Highway 101 generally runs north to south, to the east of the Project area. Beyond the Project area is primarily forested area with minimal development (see Figure 1). Additional information about the Project setting is presented in the environmental checklist, as necessary for discussion of each environmental topical area. For the purposes of this Initial Study, the environmental baseline is the existing physical condition of the Project area as of May 2025, when the environmental analysis commenced.

IV. ENVIRONMENTAL EFFECTS

An environmental checklist follows this section and addresses all potential adverse effects resulting from the proposed Project. No significant adverse effects are expected from any of the proposed activities.

V. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a **"Potentially Significant Impact"** or **"Potentially Significant Unless Mitigation Incorporated"** as indicated by the checklists on the following pages.

	Aesthetics		Agriculture and Forestry Resources		Air Quality
	Biological Resources		Cultural Resources		Energy
	Geology/Soils		Greenhouse Gas Emissions		Hazards & Hazardous Materials
	Hydrology/Water Quality		Land Use/Planning		Mineral Resources
	Noise		Population/Housing		Public Services
	Recreation		Transportation		Tribal Cultural Resources
	Utilities/Service Systems		Wildfire		Mandatory Findings of Significance

An explanation for all checklist responses is included, and all answers take into account the whole action involved and the following types of impacts: off-site and on-site; cumulative and project-level; indirect and direct; and construction and operational. The explanation of each issue identifies (a) the threshold of significance, if any, used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

In the checklist the following definitions are used:

"Potentially Significant Impact" means there is substantial evidence that an effect may be significant.

"Potentially Significant Unless Mitigation Incorporated" means the incorporation of one or more mitigation measures can reduce the effect from potentially significant to a less than significant level.

"Less Than Significant Impact" means that the effect is less than significant and no mitigation is necessary to reduce the impact to a lesser level.

"No Impact" means that the effect does not apply to the proposed project or clearly will not impact nor be impacted by the proposed project.

DETERMINATION: (To be completed by the Lead Agency on the basis of this initial evaluation)

☒	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☐	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

11/12/25

Date

Cody Cox, General Manager
Redway Community Services District

I. AESTHETICS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

DISCUSSION

A scenic resource typically refers to an expansive, panoramic view of a highly valued landscape, often observed from a publicly accessible vantage point. These views commonly showcase natural features such as coastline, mountains, hills, ridgelines, inland water features, forests, agricultural features, and rural communities in various combinations [County of Humboldt, 2017(a)].

Chapter 10 (Conservation and Open Space Elements) of the County of Humboldt General Plan describes the County's visual landscape as dominated by forested hillsides, expansive agricultural lands, significant river corridors, and a diverse coastline (County of Humboldt, 2017[a]). This framework includes goals, policies, and standards (e.g., SR-G1, SR-P2, SR-S1) to protect these valuable scenic resources and guide development to blend with natural contours and minimize disturbance. Policy SR-S4 specifically addresses light and glare, requiring new outdoor lighting to be compatible with existing settings and designed to minimize off-site impacts.

The Project involves updating water rights for the Meadows Business Park as a POU and licensing an unnamed spring, located within the community of Redway, situated approximately 0.5 miles west of U.S. Highway 101. The RCSD service area contains a mixture of land use designations, such as agricultural, commercial, industrial, and residential (see Figure 6). According to the California Department of Transportation (Caltrans), Highway 101 is not an officially designated State Scenic Highway, though it is eligible for designation, including the entire portion of Highway 101 within Humboldt County (Caltrans, No Date). The nearest officially designated State Scenic Highway, Highway 151 in Shasta County, is approximately 84 miles northeast of the Project area (Caltrans, No Date; Google Earth, 2025). Additionally, the National Register of Historic Places (NRHP) does not list any historical buildings within the Redway community. Furthermore, the Site and its immediate surroundings do not contain significant scenic attributes that would be subject to physical alteration.

IMPACT ANALYSIS

I.a) **No Impact.** Given that the Project proposes no physical changes or new development that would alter the existing visual environment and no scenic resources are present within and in the surrounding area, it would not introduce any new structures, modify existing visual elements, or alter natural topography that could obstruct, alter, or degrade any potential scenic vistas. Therefore, the proposed Project would not have a substantial adverse effect on a scenic vista and no impact would occur.

I.b) **No Impact.** The proposed Project would not substantially damage scenic resources, including trees, rock outcroppings, and historic buildings, within a State Scenic Highway. Although Highway 101 within the vicinity of the Project area and spanning all of Humboldt County is eligible for listing, it has not been officially designated as a State Scenic Highway. As noted above, the nearest officially designated State Scenic Highway is Highway 151 in Shasta County, approximately 84 miles northeast of Redway. This 3.3-mile segment generally trends north-south, connecting Shasta Dam to Highway 5 near Shasta Lake City. The nearest highway eligible for designation as a California Officially Designated State Scenic Highway is a portion of Highway 101, located along the eastern boundary of the Redway CSD boundary (Caltrans, No Date). However, the Project does not involve ground disturbance or new construction; therefore, no impact would occur to trees, rock outcroppings, and historic buildings within a State Scenic Highway.

I.c) **No Impact.** The proposed Project focuses on updating existing water rights to include the Meadows Business Park as a POU and licensing an unnamed spring. The proposed Project would not require ground disturbance, new construction, demolition, or any physical alteration to existing structures or the landscape within the Project area. As a result, the Project would not introduce any new visual elements or change the existing visual character of public views as experienced from adjacent public roads. Therefore, since no physical changes are proposed that would alter the visual environment, no impact would occur.

I.d) **No Impact.** The Project involves updating water rights for the Meadows Business Park as a POU and licensing an unnamed spring and does not include construction or installation of any physical structures or equipment. Since there are no proposed physical additions or modifications to the Project area under the proposed Project, the Project would not create a new source of substantial light or glare. Therefore, Project impacts on scenic vistas would have no impact.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Aesthetics.

II. AGRICULTURE AND FORESTRY RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?	☐	☐	☐	☒

DISCUSSION

The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) is the primary federal agency responsible for surveying, classifying, and conserving the U.S.'s soil and water resources. Through its Farmland Protection Policy Act (FPPA), the NRCS developed the classification system for Important Farmlands. This system identifies lands critical to long-term agricultural production, based on a comprehensive assessment of physical and chemical factors like soil type, moisture, and slope. The four key designations are: Prime Farmland (the best land for producing food, feed, forage, fiber, and oilseed crops), Farmland of Statewide Importance, Farmland of Local Importance, and Unique Farmland (used for high-value food and specialty crops). These Important Farmlands are afforded special protection due to their necessity for current and future agricultural production.

According to the Humboldt County Web GIS (No Date), the Project area and vicinity contain no property currently under a Williamson Act contract. Prime agricultural soils are located adjacent to the Project area, predominantly along the south side of the SF Eel River. The RCSD service area contains a mixture of land use designations, including Commercial General (CG), Commercial Services (CS), Industrial-General (IG), Public (P), Public Facility (PF), Residential Agriculture (RA), and Residential-Low Density (RL) (see Figure 6). Zoning designations within the Project area include Agriculture Exclusive (AE), Agriculture General (AG), Apartment Professional (R-4), Business Park (MB), Community Commercial (C-2), Flood Plain (FP), Forestry Recreation (FR), Heavy Industrial (MH), Industrial Commercial (C-3), Residential One-Family (R-1), and Timberland Production Zone (TPZ) (see Figure 7). The Redway core predominately includes residential and commercial uses, with the outskirts comprising agricultural and timber lands. The Meadows Business Park, proposed to be added to the Place of Use, is primarily designated and zoned for commercial and industrial uses.

The Project involves administrative changes to existing water rights. The Project does not propose any new physical development, land use changes, or increase in water withdrawal.

IMPACT ANALYSIS

II.a) **No Impact.** The Project is entirely administrative and focuses on aligning the RCSD existing water rights with existing uses. The Project does not propose any new construction or physical development. Since the Project does not involve any earth moving, site development, or change in the current land use of any property, it would not physically convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. No impact would occur.

II.b) **No Impact.** The Project is an administrative update to water rights and does not propose any changes to the current zoning or General Plan land use designations for any property. Since the Project involves no change in land use or zoning and no properties are under a Williamson Act contract, it will not conflict with any existing agricultural zoning or the provisions of a Williamson Act contract. No impact would occur.

II.c) **No Impact.** The Project is an administrative action to confirm and dedicate water rights. Areas zoned for Timber Production Zone (TPZ) are located within the Project area and areas zoned as Forestry Recreation (FR) are located in the Project vicinity (see Figure 7). The Project does not propose any changes to the zoning of any parcel and does not require the approval of a new land use permit or a rezoning action. Therefore, the Project would not conflict with existing zoning for forest land or cause the rezoning of any area designated as Timberland Production. No impact would occur.

II.d) **No Impact.** As discussed above, the Project does not propose any construction, clearing of vegetation, or ground disturbance. Its core components are administrative filings and the dedication of 52 afy of water from the unnamed spring to instream use for fish and wildlife preservation and enhancement. Since there are no physical changes, the Project would not result in the loss of forest land or the conversion of forest land to non-forest use. No impact would occur.

II.e) **No Impact.** The proposed Project would not trigger other changes in the existing environment, on- or off-site, which are not discussed herein. Furthermore, the Project would not increase the maximum allowable water diversion from the SF Eel River. Because the Project is an administrative update with no physical impacts and no increase in water demand that would drive new development, it would not lead to the conversion of Important Farmland or forestland. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Agricultural and Forestry Resources.

III. AIR QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

DISCUSSION

The proposed Project is located in the community of Redway, within southern Humboldt County, California. Humboldt County lies within the North Coast Air Basin (NCAB), which includes Del Norte, Humboldt, Trinity, Mendocino, and northern Sonoma counties. The North Coast Unified Air Quality Management District (NCUAQMD) is the regional agency responsible for regulating air quality in this basin. The NCUAQMD monitors ambient air quality, enforces local, state, and federal air quality standards, issues permits for stationary sources, and implements programs to attain and maintain clean air within its jurisdiction (NCUAQMD, 2025[a]).

Air quality in Humboldt County is shaped by its marine-influenced climate: proximity to the Pacific drives frequent coastal fog, seasonal rainfall concentrated October–April, and inversions that affect pollutant dispersion. The NCUAQMD reports Humboldt County is in nonattainment for the State 24-hour PM₁₀ standard but otherwise in attainment or unclassified for State and federal standards (NCUAQMD, 2025[a]). In response, the NCUAQMD adopted a PM₁₀ Attainment Plan (1995) that identifies cost-effective control measures to reduce ambient PM₁₀ concentrations. Although the plan is advisory and not required by the State for attainment, it provides useful guidance for minimizing particulate emissions through best management practices (BMPs), such as controlling fugitive dust and limiting wood-burning activities (NCUAQMD, 2025[a]). Local particulate episodes are often linked to residential wood burning and other combustion sources and the NCUAQMD runs a Woodsmoke Reduction program to replace uncertified devices (NCUAQMD, 2025[b]).

The Redway area, located approximately 2 miles north of Garberville along U.S. Highway 101, is a small unincorporated community surrounded by forested hillsides. The primary emission sources in Redway include vehicular traffic, wood-burning stoves, and construction or road maintenance activities. Industrial sources are limited and there are no large permitted stationary sources within the immediate vicinity. The community occasionally experiences localized smoke impacts from wildfires or prescribed burns, which are typical throughout Humboldt County's inland valleys.

The California Air Resources Board (CARB) has established statewide ambient air quality standards (CAAQS) for major pollutants of concern, including ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), fine particulate matter (PM_{2.5}), inhalable particulate matter (PM₁₀), and lead (CARB, 2025). The U.S. Environmental Protection Agency (EPA) has established similar federal standards (NAAQS) (EPA, 2025). The NCUAQMD is charged with implementing both State and federal regulations locally, in coordination with CARB and EPA Region 9.

IMPACT ANALYSIS

III.a) **No Impact.** The proposed Project involves administrative actions related to the RCSD service area and does not include any new construction, expansion, or modification of physical infrastructure. No new grading, excavation, or operation of emission-producing equipment would occur. Therefore, the Project would not generate emissions or otherwise interfere with the NCUAQMD's PM₁₀ Attainment Plan or other air quality planning efforts. No impact would occur.

III.b) **No Impact.** Because no physical improvements, construction activities, or operational changes are proposed, the Project would not result in emissions of PM₁₀ or other criteria pollutants. The Project would, therefore, not contribute to a cumulatively considerable increase in regional pollutant concentrations within the NCAB. No impact would occur.

III.c) **No Impact.** Sensitive receptors in Redway include residential dwellings, schools, and community facilities such as the Redway Elementary School and RCSD offices. Because the proposed Project would not involve new construction or introduce new stationary or mobile emission sources, it would not generate localized emissions of pollutants or toxic air contaminants capable of affecting sensitive receptors. No impact would occur.

III.d) **No Impact.** No odor-generating activities, combustion processes, or material handling are proposed. The Project is administrative in nature and would not alter land uses or introduce any new development or sources of objectionable odors. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Air Quality.

IV. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

DISCUSSION

The Project area comprises approximately 867.2 acres within the community of Redway, with a proposed Place of Use of 747.3 acres after the areas to be added and removed under the respective appropriative license and permit. The subject area to be added includes the Meadows Business Park, which has been served by the RCSD since 1998, in addition to an area immediately north of the RCSD service boundary (YMCA Camp Ravenclyff). The subject areas are located immediately adjacent to and north and west of the SF Eel River (see Figures 2 and 3).

The SF Eel River is a major tributary of the Eel River and is federally designated as recreational under the Wild and Scenic Rivers System (WSRS). Recreational classification is given to those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past (WSRS, n.d.) This section listed remarkable values for fish referring to its importance as habitat for several key fish species. The Project lies within the SF Eel River watershed (Hydrologic Unit Code [HUC] 18010105) and subsequently within the Redway Creek-Eel River HUC12 (CDC, n.d.).

The Project involves the administrative actions of the RCSD to adjust the Place and Purpose of Use of water rights, to license an existing unnamed spring right, and to permanently dedicate the spring flow for instream fish and wildlife preservation. Due to the nature of the Project, no new ground-disturbing construction, vegetation removal, or land-use conversion is proposed. RCSD's existing infiltration gallery and treatment

plant would continue to operate under the same diversion rates currently authorized by the State Water Resource Control Board (SWRCB). Furthermore, operations would continue to adhere to requirements of the California Department of Fish and Wildlife (CDFW) through Fish and Game Code (FGC) Section 1602 which requires any person, State or local governmental agency, or public utility to notify the CDFW prior to beginning any activity that may do one of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or
- Deposit or dispose of material into any river, stream or lake (CDFW, 2025).

Furthermore, a Lake and Streambed Alteration Agreement (LSAA) is required when a project activity may substantially adversely affect fish and wildlife resources. Lake and Streambed Alteration Agreements contain monitoring and reporting requirements. Issued LSAs are valid for five years and must be renewed. The RCSD is required to obtain an LSAA every five years for continued use of the diversions. This allows CDFW to add and/or modify requirements related to low-flow conditions as needed. Most recently, the RCSD has coordinated with CDFW through an LSAA notification (March 2025) to ensure its continued diversion operations meet CDFW's resource-protection standards and requirements. The RCSD will continue on-going coordination with CDFW and adhering to LSAA requirements moving forward.

To minimize cumulative impacts to listed fish and wildlife the RCSD will not divert more than 5% of streamflow as measured at the USGS gaging station at Miranda. To meet this requirement, RCSD proposes to calculate the maximum diversion amount on a 24-hour basis instead of instantaneous basis, due to the operational limitations of the pumps at the treatment plant. RCSD's water treatment plant contains numerous stages of treatment, each of which is sized to perform at a set range of flows. The raw water pumps have a maximum capacity of 450 gpm. For normal operations, the pumps are run at 350 gpm and the number of minutes they run each day varies based upon the consumption for that day. RCSD will decrease the instantaneous pumping rate to match the 5% on an instantaneous basis until the river flow reaches 11.15 cfs, but when the river falls below that flow rate, RCSD will set the pumping rate at 250 gpm and monitor the number of minutes pumped in a 24-hour period to ensure diversion rates stay under 5% of the river's flow during that same 24-hour period.

On May 23, 2018, the RCSD approved the Water Conservation Ordinance 2018-01 (Ordinance) which identifies four water-supply shortage stages to respond with when water supply falls short or infrastructure constraints affect delivery. Specifically, within the findings and intent section of the document, it is described that the RCSD's source of water (the infiltration gallery in the SF Eel River) is vulnerable during low flows, and the Ordinance is intended to ensure reliability and protect the river system. As of September 3, 2025, the RCSD released an alert on their website letting its customers know that the Water Conservation Level II strategy (as outlined in the Ordinance) is in effect due to low flows in the SF Eel River as measured by the USGS at the Miranda gauge (MRNC1)(RCSD, 2025).

To determine the potential presence of special-status species on the subject Site, databases from resource agencies were queried. As provided by the U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation (IPaC) System, CDFW's Biogeographic Information and Observation System (BIOS) [including California Natural Diversity Database (CNDDB)], and the California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants, several wildlife and plant species (18 birds, 1 amphibian, 2 insects, 1 reptile, 2 fish, and 17 plants) have the potential to occur within the Garberville Quad, which includes the Site. The candidate, sensitive, or special status species with the potential to occur on-site are listed in Table 6, below.

Table 6. Species with the Potential to Occur at or Within Vicinity of the Site

Common Name	Scientific Name
Birds	
Allen's hummingbird	<i>Selasphorus sasin</i>
American peregrine falcon	<i>Falco peregrinus anatum</i>
bald eagle	<i>Haliaeetus leucocephalus</i>
California condor	<i>Gymnogyps californianus</i>
California gull	<i>Larus californicus</i>
chestnut-backed chickadee	<i>Poecile rufescens rufescens</i>
evening grosbeak	<i>Coccothraustes vespertinus</i>
golden eagle	<i>Aquila chrysaetos</i>
marbled godwit	<i>Limosa fedoa</i>
marbled murrelet	<i>Brachyramphus marmoratus</i>
northern spotted owl	<i>Strix occidentalis caurina</i>
oak titmouse	<i>Baeolophus inornatus</i>
olive-sided flycatcher	<i>Contopus cooperi</i>
rufous hummingbird	<i>Selasphorus rufus</i>
western gull	<i>Larus occidentalis</i>
western screech owl	<i>Megascops kennicottii cardonensis</i>
western snowy plover	<i>Charadrius alexandrinus nivosus</i>
wrentit	<i>Chamaea fasciata</i>
Amphibians	
foothill yellow-legged frog – north coast DPS	<i>Rana boylei</i> pop. 1
Insects	
monarch butterfly	<i>Danaus plexippus</i>
western bumble bee	<i>Bombus occidentalis</i>
Reptiles	
northwestern pond turtle	<i>Actinemys marmorata</i>
Fish	
Steelhead- northern California DPS summer-run	<i>Oncorhynchus mykiss irideus</i> pop. 48
Steelhead- northern California DPS winter-run	<i>Oncorhynchus mykiss irideus</i> pop. 49
Plants	
bristly leptosiphon	<i>Leptosiphon aureus</i>
broad-lobed leptosiphon	<i>Leptosiphon latisectus</i>
coast fawn lily	<i>Erythronium revolutum</i>
heart-leaved twayblade	<i>Listera cordata</i>
Howell's montia	<i>Montia howellii</i>
Humboldt County fuchsia	<i>Epilobium septentrionale</i>
Humboldt County milk-vetch	<i>Astragalus agnicidus</i>
Methuseleah's beard lichen	<i>Usnea longissima</i>
North Coast semaphore grass	<i>Pleuropogon hooverianus</i>
northern bugleweed	<i>Lycopus uniflorus</i>
northern clustered sedge	<i>Carex arcta</i>
redwood lily	<i>Lilium rubescens</i>
Siskiyou checkerbloom	<i>Sidalcea malviflora</i> ssp. <i>patula</i>
small groundcone	<i>Kopsiopsis hookeri</i>
streamside daisy	<i>Erigeron biolettii</i>
Tracy's tarplant	<i>Hemizonia congesta</i> ssp. <i>tracyi</i>
white-flowered rein orchid	<i>Piperia candida</i>

Source: USFWS, n.d., CDFW, 2025, and CNPS, 2025.

As the actions proposed by this Project are administrative in nature and would not increase the amount of water diverted beyond the environmental baseline of May 2025, alter existing facilities, nor necessitate the need for additional facilities as no new development is proposed under the Project, it is unlikely that there would be a direct or indirect effect on terrestrial or aquatic habitats.

IMPACT ANALYSIS

IV.a) **Less Than Significant Impact.** The Project is administrative only, with no new development proposed and no increase in water withdrawal beyond those amounts already approved would occur. No ground disturbance, facility expansion, or operational change that could directly or indirectly affect special status

species or modify habitat is proposed by this Project. In addition, as shown in Tables 4 and 5, historic and recent diversion amounts remain below SWRCB authorized amounts. To minimize cumulative impacts to listed fish and wildlife the RCSD will not divert more than 5 percent of streamflow as measured at the USGS gaging station at Miranda. RCSD will decrease the instantaneous simultaneous pumping rate to match the 5 percent on an instantaneous basis until the river flow reaches 11.15 cfs, but when the river falls below that flow rate, RCSD will set the pumping rate at 250 gpm and monitor the number of minutes pumped in a 24-hour period to ensure diversion rates stay under 5 percent of the river's flow during that same 24-hour period. The RCSD is required to obtain an LSAA every five years for continued use of the diversions. This allows CDFW to add and/or modify requirements related to low-flow conditions as needed. Most recently, the RCSD has coordinated with CDFW through an LSAA notification (March 2025) to ensure its continued diversion operations meet CDFW's resource-protection standards and requirements. The RCSD will continue on-going coordination with CDFW and adhering to LSAA requirements moving forward. Since the existing water diversions are existing and the Project would not result in additional water withdrawals, a less than significant impact would occur.

IV.b) **Less Than Significant Impact.** There are no physical activities (e.g., clearing, grading, or channel work) and no increase in diversion rate or amount, as such riparian and other sensitive communities would not be altered. Continued operation under the Project would not introduce new stressors to riparian systems as current and proposed uses will remain similar, which, according to Tables 4 and 5, indicates the existing water diversions have remained under the amounts allowed by the SWRCB. A less than significant impact would occur.

IV.c) **No Impact.** The Project does not include any ground disturbance, fill, or channel modifications and does not propose a change to diversion amounts that could alter wetland hydrology. Review of National Wetland Inventory data managed and provided by United States Fish and Wildlife Service (USFWS), as displayed in Figure 9, the Project area does contain Freshwater and Riverine classified wetlands with the vast majority of these wetlands occurring within the banks and channels of the SF Eel River. Although the Project area contains identified and known wetlands (along the channel and banks of the SF Eel River), no disturbance is proposed that would directly or indirectly impede State or federally listed wetlands. No impact would occur.

IV.d) **No Impact.** No new infrastructure or construction is proposed that could impede movement of terrestrial or aquatic species. The RCSD is required to obtain an LSAA every five years for continued use of the diversions. This allows CDFW to add and/or modify requirements related to low-flow conditions as needed. Most recently, the RCSD has coordinated with CDFW through an LSAA notification (March 2025) to ensure its continued diversion operations meet CDFW's resource-protection standards and requirements. The RCSD will continue on-going coordination with CDFW and adhering to LSAA requirements moving forward to minimize potential impacts and ensure diversion practices remain protective of fish and wildlife movement. Moreover, instream dedication of the spring supports aquatic connectivity during low-flow periods. No impact would occur.

IV.e) **No Impact.** The Project as proposed aligns itself with existing policies and ordinances including adhering to the requirement and policies of the CDFW through the LSAA process, the SWRCB through annual reporting and by following requirements necessary for the Project to move forward including applying to the SWRCB to amend RCSD's existing water rights as previously discussed including an expansion request in POU, Petition for an Extension of time, and spring diversion licensing to ultimately permanent dedication of the spring for instream use for recreational and fish and wildlife preservation providing enhanced ecological and recreational purposes. Additionally, the RCSD is proactive in implementing its own Ordinance (described above), including and associated water conservation measures, during drought and/or low-flow periods. No impact would occur.

IV.f) **No Impact.** The proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan, as there are no such plans applicable to the Site. No impact would occur.

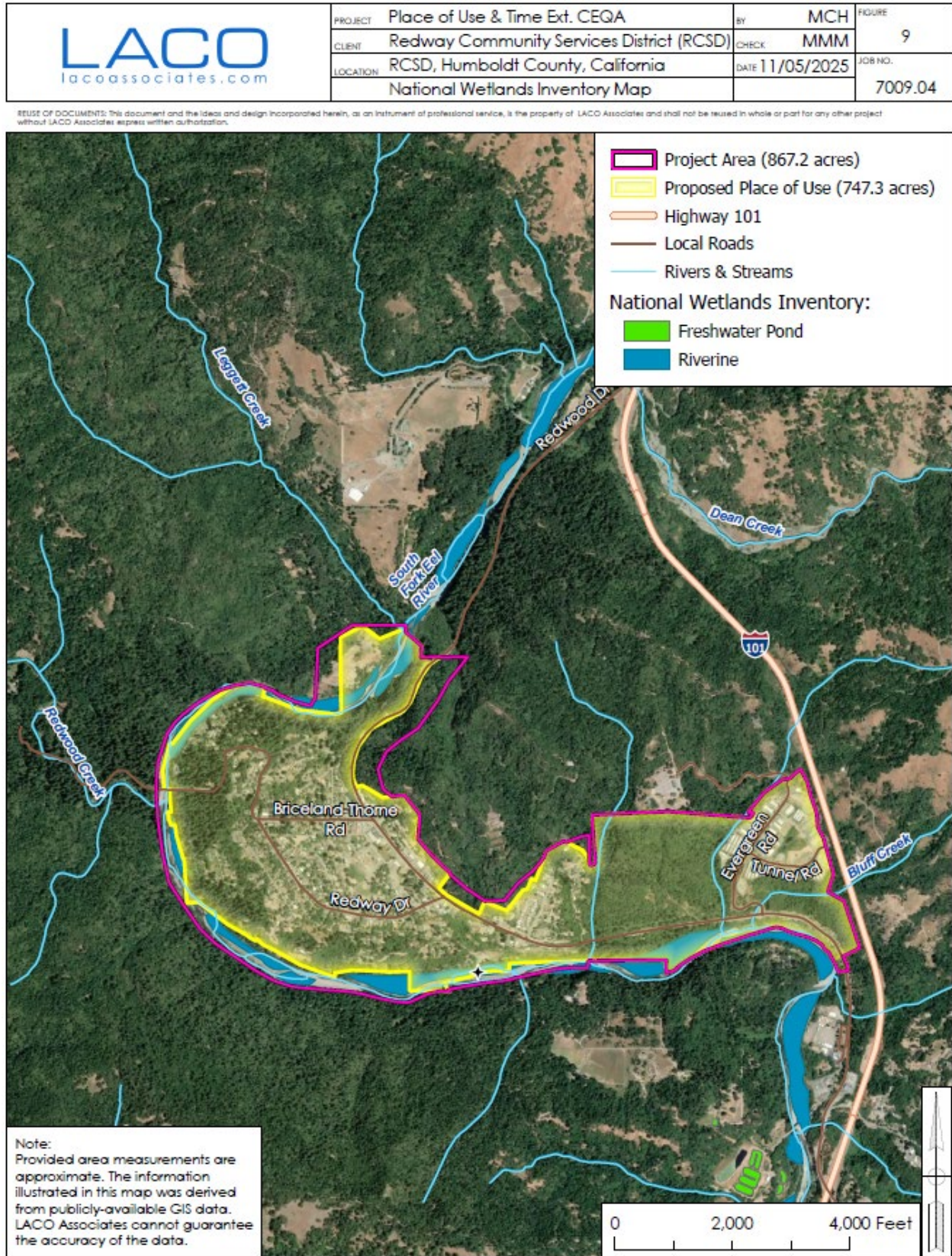
MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Biological Resources.

Figure 9. National Wetlands Inventory Map



V. CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

DISCUSSION

The Cultural Resources section identifies and evaluates a proposed project's potential impacts on significant cultural resources, which provide invaluable insights into past human activities and cultural development. These resources typically encompass archaeological resources (evidence of prehistoric and historic human occupation), historic resources (buildings, structures, objects, or sites significant under criteria such as those of the California Register of Historical Resources, defined in Public Resources Code [PRC] Section 5024.1), and Tribal Cultural Resources (TCRs). In accordance with PRC Section 5024.1(c)(1-4), a resource is considered historically significant if it retains "substantial integrity" and meets at least one of the following criteria: 1) is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; 2) is associated with the lives of persons important in our past; 3) embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; and/or 4) has yielded, or may be likely to yield, information important in prehistory or history. Under the CEQA, a project can cause a significant environmental effect if it results in a substantial adverse change to the significance of historical resources (PRC Section 21084.1), archaeological resources, or TCRs.

The Applicant has defined the APE as the approximately 867.2-acre Project area, shown on Figure 1 above, as the area that is associated with the RCSD jurisdictional boundary and an out-of-agency service connection (YMCA Camp Ravencliff, APN: 222-222-004, 16.48 acres), located just north of the jurisdictional boundary that currently receives water and wastewater services from the RCSD, for the purpose of amending two existing water rights, including an appropriative license and an appropriative permit. No structures in the APE are listed or eligible for listing on the National Park Services (NPS) National Register of Historic Places (NRHP).

Native American Heritage Commission Outreach

On September 16, 2025, LACO Associates (LACO), on behalf of the Applicant, contacted the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and the contact information for the representatives of the Native American tribes associated with the Project area. On September 16, 2025, a response was received from the NAHC, which indicated that the results of the Sacred Lands File (SLF) search were negative. Included with the letter was a Native American contact list of tribes who may have knowledge of cultural resources in the Project area. One tribal contact is included on the NAHC contact list, which includes the representative from the Bear River Band of Rohnerville Rancheria.

Tribal Outreach

On September 29, 2025, RCSD staff sent a letter to the Bear River Band of Rohnerville Rancheria (Tribe) to inform them of the proposed Project and offered consultation in accordance with Public Resources Code §21080.3.1. As of the date of this Initial Study, no responses or comments have been received.

IMPACT ANALYSIS

V.a) **No Impact.** The proposed Project is solely for administrative amendments to existing water rights and dedication of instream flow; no physical development, construction, demolition, or ground disturbance is proposed within the APE. The Project does not involve any modification to existing structures or sites. Furthermore, no structures in the APE are currently listed or eligible for listing on the NRHP. Since the Project is administrative and does not physically affect any built or structural resources, it will not cause a substantial adverse change to the significance of a historical resource.

V.b) **No Impact.** The proposed Project is administrative and non-physical in nature, and does not involve excavation, earth-moving activities, or ground disturbance of any kind. Additionally, a search of the SLF by the NAHC was negative for known resources in the Project area. Because no ground disturbance will occur, the Project has no potential to cause a substantial adverse change in the significance of an archaeological resource.

V.c) **No Impact.** The Project involves no physical construction, excavation, or ground-disturbing activities. As the Project is limited to administrative actions concerning existing water rights, there is no potential for disturbing human remains, including those interred outside of formal cemeteries.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Cultural Resources.

VI. ENERGY. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

DISCUSSION

Humboldt County relies on a combination of imported and locally generated electricity and natural gas resources to serve residential, commercial, and municipal needs. The County is located within the service territories of the Pacific Gas and Electric Company (PG&E) and the Redwood Coast Energy Authority (RCEA), which together provide electricity throughout most of Humboldt County, including the community of Redway. RCEA operates as the local Community Choice Aggregation (CCA) provider and procures electricity on behalf of customers in Humboldt County, while PG&E maintains the physical infrastructure and delivers energy through its transmission and distribution system (RCEA, 2025[a]; PG&E, 2023).

Electricity in the County is generated from a variety of sources, including renewable and non-renewable resources. The Humboldt Bay Generating Station in Eureka provides local generation through natural gas-fired reciprocating engines capable of producing up to approximately 163 megawatts (MW) (CEC, 2024). Renewable sources such as biomass cogeneration, small hydroelectric, and solar energy are also part of RCEA's procurement portfolio, with the Humboldt Sawmill Company's 28 MW biomass facility in Scotia serving as one of the region's primary renewable energy producers (RCEA, 2025[b]). In addition, RCEA's renewable portfolio includes contracted energy from statewide solar facilities and participation in local distributed solar and battery storage programs.

In rural unincorporated communities such as Redway, energy use is primarily associated with residential development, small commercial operations, and public facilities such as the RCSD. Energy demands within the District generally include electricity for potable water pumping and distribution, wastewater collection and treatment facilities, and administrative functions.

Humboldt County and RCEA both promote energy efficiency and renewable energy generation through implementation of State and local programs such as the California Building Energy Efficiency Standards (Title 24, Part 6), the California Green Building Standards Code (CALGreen), and RCEA's Comprehensive Action Plan for Energy (CAPE). These programs encourage reduced dependence on fossil fuels and improved system efficiency consistent with the State's long-term decarbonization goals (RCEA, 2019).

IMPACT ANALYSIS

VI.a) **No Impact.** No construction is proposed as part of the Project. The Project is administrative in nature and would not result in any physical development or modification to existing facilities that could increase energy use. Therefore, the Project would not require the use of construction equipment, materials transport, or other activities that consume fuel or electricity. With this understanding, RCSD would continue to operate the requisite water and wastewater infrastructure utilized to provide its services to the unincorporated community of Redway. Any electricity use would be limited to normal office operations and ongoing utility management activities, which are part of existing baseline conditions. These functions are expected to remain consistent with current energy consumption levels and would continue to utilize power supplied through the existing RCEA and PG&E service framework.

Because the Project would not involve construction, modification, or intensification of land use, and would not alter the District's ongoing operational energy demand, it would not result in wasteful, inefficient, or unnecessary consumption of energy resources. No impact would occur.

VI.b) **No Impact.** As previously stated, the Project would not involve any new construction or operational changes that could conflict with State or local energy plans. As an administrative action, the Project would not result in additional energy demand or infrastructure requirements and would not affect the implementation of State or local renewable energy programs.

The Project would remain consistent with the California Energy Commission (CEC) energy efficiency standards, California Public Utilities Commission (CPUC) renewable energy requirements, and the Humboldt County General Plan Energy Element. Furthermore, the Project aligns with the RCEAs CAPE, which encourages energy conservation and administrative coordination among public agencies in Humboldt County.

Because the Project would not generate new energy demand or impede energy policy implementation, it would not conflict with or obstruct any State or local renewable energy or energy efficiency plans. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Energy.

VII. GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

DISCUSSION

Elevations at the Project Site in southern Humboldt County range from approximately 280 feet above mean sea level (amsl) along the northwestern and southern boundaries up to approximately 660 feet amsl in the northeastern portion of the Project area (Google Earth Pro, 2025). The region experiences a cool, wet climate with mild summers and high annual rainfall due to the influence of the nearby Pacific Ocean and orographic effects of the surrounding Coast Range ridges. The Site is situated within the Coast Ranges geomorphic province, a seismically active and geologically complex province characterized by northwest-trending ridges and valleys, complexly folded and faulted sedimentary rocks, and ongoing tectonic deformation (CGS, 2002).

According to the California Geological Survey (CGS) Earthquake Zones of Required Investigation web application, the Project Site is located approximately 13.4 miles east of the nearest known active fault zone, the Shelter Cove Fault Zone (CGS, 2025[a]). No active faults are mapped on or directly adjacent to the Project Site, and the Site is not within an Alquist-Priolo Earthquake Fault Zone. However, the Project area, like all of northern California, is within a seismically active region and subject to strong seismic ground shaking during a major earthquake. Based on regional fault mapping, the Site is not within a mapped earthquake-induced landslide zone or liquefaction hazard zone, though localized instability may occur on steep slopes.

Topography within the Site ranges from gently sloping terrace surfaces to moderately and steeply sloping mountain flanks. The NRCS Web Soil Survey identifies the dominant soil units on the Site as:

- Urban land–Garberville complex (311), 5 to 15 percent slopes (approximately 35.6 percent of Site): well-drained loamy soils on stream terraces; not prime farmland.
- Seelycreek–Madturkey–Gibsoncreek complex (304), 30 to 50 percent slopes (approximately 26.1 percent of Site): steep, well-drained soils on mountain slopes; not prime farmland.
- Gibsoncreek–Seelycreek complex (303), 5 to 30 percent slopes (approximately 14.8 percent of Site): moderately sloping to steep soils on benches and mountain slopes; not prime farmland.
- Grizzlycreek–Chaddcreek complex (181), 2 to 9 percent slopes (approximately 9.8 percent of Site): loamy soils on terraces and fans, designated as Farmland of Statewide Importance.
- Water and Oxyaquic Udifluvents (100), 0 to 2 percent slopes (approximately 10.3 percent of Site): gravelly sandy loam subject to frequent flooding, associated with riparian corridors; not prime farmland.

Other soil complexes mapped in smaller extents (less than 5 percent each) include the Gibsoncreek–Leggett creek–Seelycreek complex (305) on steep mountain slopes, and the Sproulish, Canoecreek, and Redwohly warm complexes (571, 572) on very steep uplands.

Overall, soils at the Site range from well-drained upland complexes with moderate to high erosion potential on steeper slopes, to somewhat poorly drained alluvial soils subject to frequent flooding in riparian zones. Hydric soils are present along low-lying areas mapped as Udifluvents, indicating potential wetland or riparian resource areas. The presence of Grizzlycreek–Chaddcreek soils designated as Farmland of Statewide Importance demonstrates that portions of the site also have recognized agricultural value (NRCS, 2025).

IMPACT ANALYSIS

VII.a.i) **Less than Significant.** The Project Site is located in a seismically active region of Northern California within the Coast Ranges geomorphic province. According to the California Geological Survey Earthquake Zones of Required Investigation web application, the Site is located approximately 13.4 miles east of the nearest known active fault, the Shelter Cove Fault Zone. No active or potentially active faults are mapped within or immediately adjacent to the Site, and the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone (CGS, 2025[a]). As such, impacts related to rupture of a known fault would be less than significant.

VII.a.ii). **Less than Significant.** The Site has the potential for strong ground shaking as is common throughout the region due to the proximity of regional faults (e.g., San Andreas, Bartlett Springs, Maacama Faults, and the Cascadia subduction zone), as well as other active faults within northern California. According to the CGS Ground Motion Hazard Maps (CGS, 2025[b]), the Site has a 2 percent peak ground velocity (PGV²) of 106.2 centimeters per second (cm/s). Although strong ground shaking at the Project Site is likely, due to the nature of the Project (Petition for Changes to Water Rights, Time Extension, Instream Dedication, and a Domestic Water Supply Permit) which does not require construction or development of new or alternate facilities nor the need for increased or new personnel to manage, maintain, or modify existing infrastructure, the Project is not likely to increase risk (directly or indirectly) of loss, injury, or death. As such, a less than significant impact would occur.

VII.a.iii) **No Impact.** As depicted by the Humboldt County Web GIS (WebGIS) interactive mapping application, the Project area does not have mapped or known areas of potential liquefaction (WebGIS,

² PGV is the maximum speed (velocity) the ground moves during an earthquake (CGS, 2025[c]).

2025). The Project, as described above does not include physical alterations to the Project area and, as such, no impact would occur regarding seismic-related ground failure or liquefaction associated with the Project.

VII.a.iv) **Less than Significant.** According to the CGS Map Sheet 58: *Deep-Seated Landslide Susceptibility* map, which categorizes the potential for a landslide to occur from zero (0) to ten (10) (low to high), the Project Site has the potential for a deep-seated landslide to occur with occurrence ranges from 0 to 10 (CGS, 2011). As depicted, flatter more developed areas like those around Par Avenue or the Redway Business Park generally have lower ratings while areas just outside of those locations range from 3-10 with the highest ratings (10) generally being located at locations of steep (high slopes) terrain and along the banks of the SF Eel River. As previously described, the Project does not propose new physical developments nor the need to modify existing personnel counts on or around the Project Site, as such, a less than significant impact would occur.

VII.b) **No Impact.** As previously described, the Project does not include physical alterations to the Project area and, as such, no impact would occur regarding the loss of topsoil or erosion factors in the area, associated with the Project.

VII.c) **Less than Significant.** The Humboldt County WebGIS Seismic Safety mapping shows the proposed Project area within a Seismic Safety Zone 1 (Low Instability) with areas of Safety Zone 2 (Moderate Instability) – Relatively Stable, and as previously described, does not depict areas of potential liquefaction. As such, the Project would have a less than significant impact.

VII.d) **No Impact.** According to the NRCS Web Soil Survey, clay-rich soils such as Seelycreek and Madturkey components have moderate plasticity and may exhibit moderate shrink-swell potential, while the majority of mapped soils (e.g., Garberville and Gibsoncreek series) have low to moderate expansion potential. Additionally, because the Project does not include physical alteration to the Project area, no impact would occur.

VII.e) **No Impact.** The Project does not include physical alterations to the Project area, as such, no current or future use or development of septic tanks or wastewater disposal systems would be necessary to facilitate the project. No impact would occur.

VII.f) **No Impact.** As previously stated, the Project does not include physical alterations to the Project area, as such it is not anticipated that the Project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Geology and Soils.

VIII. GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions (GHG), either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

DISCUSSION

The Project Site is located within the North Coast Air Basin (NCAB) and is subject to North Coast Unified Air Quality Management District (NCUAQMD) requirements. The NCUAQMD is responsible for monitoring and enforcing federal, State, and local air quality standards in the County of Humboldt.

The Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, is a State law that establishes a comprehensive program to reduce GHG emissions from all sources throughout the State. AB 32 requires the State to reduce its total GHG emissions to 1990 levels by 2020, a reduction of approximately 15 percent below emissions expected under a "business as usual" scenario. Pursuant to the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan), the California Air Resources Board (CARB) is responsible for managing climate change programs and overseeing all air pollution control efforts in California. The 2022 Scoping Plan presents the State's plan to achieve carbon neutrality by 2045 or earlier. AB 32 requires the following seven GHGs be regulated, reduced, and included in the State's targets and goals: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃). CO₂ is the primary GHG emitted in California and accounted for 83 percent of total GHG emissions in 2019 (CARB, 2025 [b]). Under AB 32, CARB set the 2020 GHG emissions statewide limit equal to the 1990 level, or 431 million metric tonnes of carbon dioxide equivalent (MMTCO₂e). Pursuant to Senate Bill (SB) 32 and Executive Order S-3-05, California has a reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The 2022 Scoping Plan defines more stringent targets, including the goal to achieve a 48 percent GHG reduction by 2030, reduce anthropogenic emissions by at least 85 percent below 1990 levels by 2045, and carbon neutrality (zero net emissions) no later than 2045.

CARB, in its *California Greenhouse Gas Emissions for 2000 to 2022 Report* (2024), states that GHG emissions within the State of California have generally followed a declining trend since the peak in 2004. In 2022, statewide GHG emissions were 371.1 MMTCO₂e, 9.3 MMTCO₂e lower than 2021 levels (380.4 MMTCO₂e) and 59.9 MMTCO₂e below the 2020 statewide GHG limit of 431 MMTCO₂e. Notably, State GHG emissions dropped below the 2020 GHG limit in 2014 and have remained below since that time. The transportation section remains the largest source of GHG emissions in the State, accounting for approximately 38 percent of the State's GHG emissions in 2020. As shown in Table 7, below, the transportation section remains the largest source of GHG emissions in the State, accounting for approximately 39 percent of the State's GHG emissions in 2022 (CARB, 2025[c]).

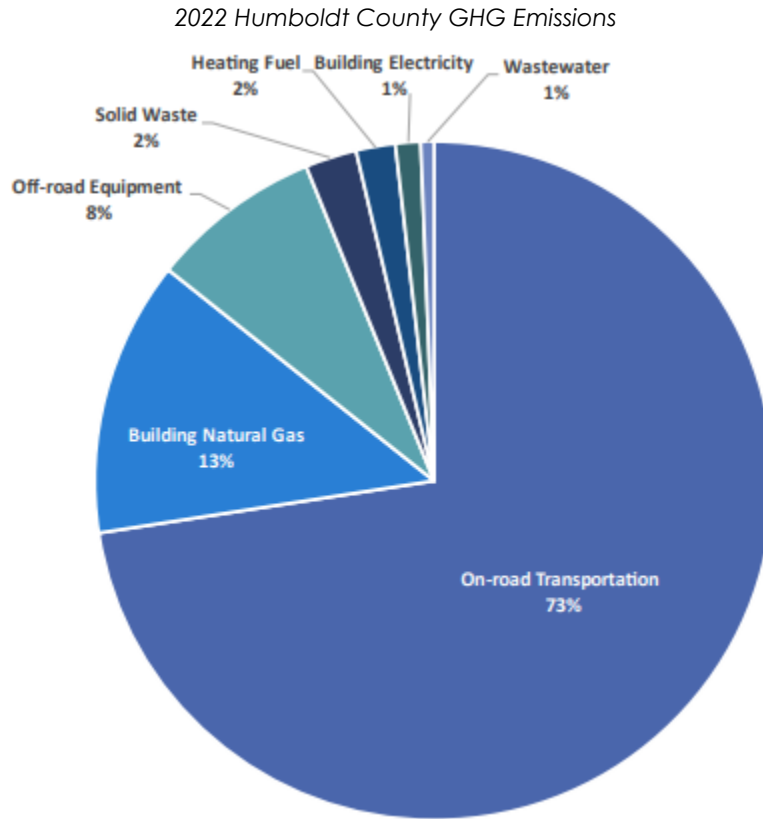
Table 7. California's GHG Emissions by Economic Sector in 2022

Economic Sector	Percentage of California's Total GHG Emissions (2022)
Transportation	39%
Industrial	23%
Electricity	16%
Agriculture & Forestry	8%
Residential	8%
Commercial	6%
Total	100%

Source: California Air Resources Board (CARB), 2025[b].

According to Chapter 3 (Environmental Setting and Impacts) of the Humboldt County General Plan Update Draft Environmental Impact Report (DEIR) (revised April 20, 2017), the County has seen a significant decline in GHG emissions since 1990. This is likely attributable to a steady and significant decline in the local lumber industry and closure of major industrial facilities related to timber processing, including lumber and pulp mills. The data included in the DEIR reveals that overall GHG emissions in unincorporated Humboldt County in 2006 (approximately 1.31 MMTCO₂e) were approximately a half-million metric tons less than in 1990 (approximately 1.82 MMTCO₂e). Because of the reduction in GHG production since the peak of the logging era, and Humboldt County's sparse and largely rural population, the DEIR concludes that a single development, such as the proposed project, would not have an individually-discernible effect on GHG emissions. The County's approach to development and controlling GHG emissions countywide, as articulated in the DEIR, is to focus development in the unincorporated areas of the County close to the urban areas to reduce vehicle miles travelled, encourage public transit use, reduce the carbon footprint of water and wastewater treatment, and encourage local and renewable sources of energy for use in the County (County of Humboldt, 2017[b]). The proposed Project is consistent with these goals, as the Site is comprised of the unincorporated community of Redway located adjacent to Highway 101.

A *Humboldt County Regional Climate Action Plan* (RCAP) was prepared by the County of Humboldt in November 2024, in collaboration the Cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, and Trinidad, and other regional partners, such as the Redwood Coast Energy Authority (RCEA), Humboldt County Association of Governments (HCAOG), Humboldt Transit Authority (HTA), Humboldt Waste Management Authority (HWMA), and Recology, for purposes of aiding jurisdictions within the region to achieve the statewide GHG goals and includes a variety of strategies, measures, and actions to lower countywide GHG emissions. In 2022, countywide GHG emissions were estimated to be 1,531.167 MTCO₂e. A pie chart depicting the sources of the County's GHG emissions in 2022 is presented below. As shown, transportation sources account for approximately 73 percent of the County's total GHG emissions in 2022 (County, 2024). The Draft Environmental Impact Report (DEIR) (SCH No.: 2024081319) was prepared in February 2025 and circulated for public review. As of the date of this Initial Study, the RCAP has still yet to be formally adopted by County decisionmakers.



Source: County of Humboldt, 2024.

IMPACT ANALYSIS

VIII.a) **No Impact.** As shown above, on-road transportation accounts for the largest percentage (approximately 73 percent) of the County's total GHG emissions in 2022, with wastewater and related infrastructure noted as the source of approximately 1 percent of Humboldt County's overall estimated GHG emissions in 2022. The infrastructure utilized by RCSD to provide wastewater service to the unincorporated community of Redway accounts for just a small percentage of the 1 percent of overall wastewater-related GHG emissions countywide. The proposed Project involves administrative actions related to the RCSD service area and does not include construction, expansion, or modification of physical infrastructure. As such, no impact would occur.

VIII.b) **No Impact.** The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gasses. The proposed Project does not include construction activities, nor does it require additional staff to maintain beyond those already utilized for the use as such transportation, estimated at 73 percent as a source of GHG emissions countywide, would not be increased. As such no components of the Project would conflict with the strategies, measures, and actions included in the CAP or impact the County or State's ability to achieve their established targets. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Greenhouse Gas Emissions.

IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

DISCUSSION

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, State, or local agency, or has characteristics defined as hazardous by a federal, State, or local agency. Chemical and physical properties such as toxicity, ignitability, corrosiveness, and reactivity cause a substance to be considered hazardous. These properties are defined in the California Code of Regulations (CCR), Title 22, §66261.20-66261.24. A "hazardous waste" includes any hazardous material that is discarded, abandoned, or will be recycled. Therefore, the criteria that render a material hazardous also cause a waste to be classified as hazardous (California Health and Safety Code, §25117).

The Cortese List (Government Code §65962.5) is a planning document used by the State, local agencies, and developers to comply with CEQA requirements by identifying sites that have known hazardous materials concerns. The Cortese List is maintained by the California Environmental Protection Agency (CalEPA) and is composed of data from several agencies, including the Department of Toxic Substances Control (DTSC) EnviroStor database and the State Water Resources Control Board (SWRCB) GeoTracker database (CalEPA, 2025).

A search of the DTSC EnviroStor database did not identify any active site within approximately 2 miles of the Project Site (DTSC, 2025). For purposes of this search, the Project's centroid³ was identified as approximately (40.11879608, -123.81840437).

A similar search of the SWRCB GeoTracker database identified 25 cleanup sites in the vicinity (within 2 miles of the Project centroid), including one site with a status of "Open – Verification Monitoring" and 24 sites with a status of "Completed – Case Closed". A summary of the listed sites within 2 miles of the Project is provided in Table 8, below.

Table 8. GeoTracker Sites Within 2 Miles of the Project

Site Name	Site Type	Status	Status Date
TEXACO, ED'S	LUST CLEANUP SITE	OPEN - VERIFICATION MONITORING	1/6/2012
CDOT, GARBERVILLE MAINTENANCE STATION	CLEANUP PROGRAM SITE	COMPLETED - CASE CLOSED	5/25/2011
PG&E GARBERVILLE	CLEANUP PROGRAM SITE	COMPLETED - CASE CLOSED	9/17/2012
CDF EEL RIVER CONSERVATION CAMP	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	7/15/2013
CDF GARBERVILLE	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	7/16/1997
CDOT GARBERVILLE MAINTENANCE STATION	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	7/9/2003
CHEVRON #9-0416	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	4/27/2015
CHEVRON #9-0667 (CONNIE'S CORNER GIFTS)	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	9/19/2011
CHEVRON, GARBERVILLE	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	6/29/2021
CONTEL, GARBERVILLE	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	5/19/1999
GARBERVILLE TEXACO, FORMER	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	9/2/2020
HPI GARBERVILLE SHELL	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	10/24/2016
HUMBOLDT PETROLEUM - REDWAY SHELL*	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	4/19/1996
MOTEL GARBERVILLE	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	8/14/2015
PG&E GARBERVILLE	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	8/25/2008
REDWAY CARDLOCK*	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	8/14/2001
REDWAY COMMUNITY SERVICES DISTRICT - EEL RIVER LIFT STATION*	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	5/27/2009
REDWAY ELEMENTARY SCHOOL*	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	5/6/1996
SHUSD DISTRICT OFFICE	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	1/7/2008
SOUTHERN HUMBOLDT BUILDERS	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	1/7/1991
SOUTHERN HUMBOLDT COMMUNITY HOSPITAL	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	8/19/2004
TEXACO - BIG A AUTO PARTS	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	7/25/2016
UNOCAL #4080	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	4/24/2018
UNOCAL BULK PLANT #0228	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	8/5/2016
UNOCAL BULK PLANT #1153/RENNER	LUST CLEANUP SITE	COMPLETED - CASE CLOSED	8/5/2016

Note: Site names with a (*) at the end of their name are sites that are located within the Project area.

Source: GeoTracker, 2025

As noted above, the only site not indicated as completed is the "Texaco, Ed's Site", which is located approximately 1.4 miles southeast of the Project area in the town of Garberville.

³ Centroid: The geometric center or average location of a spatial feature. In this case, the geometric center of the Project area.

IMPACT ANALYSIS

IX.a-b) **No Impact.** As previously stated, the Project does not propose the physical alteration of the Project area, as such no new routine transport, use, or disposal of hazardous materials would be associated with the Project.

A search of the DTSC EnviroStor database determined there were no known or reported cleanup sites within approximately 2 miles of the Project centroid. A search of the SWRCB GeoTracker database identified 1 open case and 24 closed cases, including four records mapped within the Project area (Humboldt Petroleum – Redway Shell, Redway Cardlock, RCSD – Eel River Lift Station, and the Redway Elementary School) with the remaining 21 cases located outside the Project area including 1 active case (Texaco, Ed's). These records confirm historical hazardous materials use in the vicinity, but all cases aside from Texaco, Ed's are designated as "Completed - Case Closed" indicating no further remedial action is required. As previously stated, Texaco, Ed's site is located approximately 1.4 miles to the southeast, this puts it on the opposite side of State Highway 101 from both the Project area and the SF Eel River.

The Project area does not have currently listed open cases on the Cortese List (Government Code §65962.5) and does not operate as an active hazardous waste facility. Therefore, no impact would occur.

IX.c) **No Impact.** The Project area does not have currently listed open cases on the Cortese List (Government Code §65962.5) and does not operate as an active hazardous waste facility. The Redway Elementary School is located within the Project area at 344 Humboldt Avenue in Redway, California. However, as previously stated, the Project does not propose physical alterations to the Project area, no construction is anticipated with the Project, as such it is not anticipated that hazardous materials would be used or stored at the Site in any quantity or application that could impact any schools in the area. As such, the Project would not result in hazardous emissions or hazardous materials handling within 0.25 miles of a school. Therefore, no impact would occur.

IX.d) **Less Than Significant Impact.** As previously discussed, the Cortese List (Gov. Code §65962.5) consolidates hazardous site information from multiple State agencies, including the DTSC's EnviroStor database and the SWRCB's GeoTracker database. A search of these databases identified 1 open case and 24 closed cases, including 4 records mapped within the Project area (Humboldt Petroleum – Redway Shell, Redway Cardlock, RCSD – Eel River Lift Station, and the Redway Elementary School) with the remaining 21 cases located outside the Project area including 1 active case (Texaco, Ed's). These records confirm historical hazardous materials use in the vicinity, but all cases aside from Texaco, Ed's are designated as "Completed - Case Closed" indicating no further remedial action is required. As previously stated, the "Texaco, Ed's" site is located approximately 1.4 miles to the southeast. This site is located on the opposite side of State Highway 101 from both the Project area and the SF Eel River.

As such, while the Project area does contain sites associated with historical hazardous materials cases, all identified cases within a distance of concern are closed and regulatory agencies have determined that no further action is required. Therefore, a less than significant impact would occur.

IX.e) **No Impact.** Per review of the *Humboldt County Airport and Land Use Compatibility Plan* (adopted April 13, 2021), the Project is not located within an airport land use plan (HumCo, 2021). The nearest private or commercial airport to the Project area is the Garberville Airport, located approximately 1.7 miles south of the Project area. The Garberville Airport is a general aviation facility with a single north-south oriented asphalt runway (18-36) measuring 2,783-feet long and 75-feet wide (HumCo, 2021).

The Project would not involve the construction or operation of tall structures, lighting, or uses that could interfere with aviation operations. Therefore, no impact related to airport hazards or excessive aircraft noise exposure would occur.

IX.f) **No Impact.** Redway is a small, unincorporated community that does not maintain its own emergency response or evacuation plans instead relying on plans adopted by Humboldt County that includes emergency response or evacuation plans such as the *Humboldt County Operational Area Hazard Mitigation Plan* (HMP) (January 2020) and the *Emergency Operations Plan* (EOP) (2015).

The Project would not include construction or other physical alterations that could block, reroute, or otherwise interfere with established roadways or emergency access corridors. The Project area is served by local roads such as Redway Drive and Briceland-Thorne Road, which are part of Humboldt County's designated emergency response network. The Project would not modify these routes or introduce new infrastructure that could alter traffic circulation patterns.

The Project also would not result in increased population or development intensity that could affect evacuation demand or emergency response capability. Therefore, the Project would not impair the implementation of, or physically interfere with, an adopted emergency response or evacuation plan such as the HMP or EOP, and no impact would occur.

IX.g) **Less Than Significant Impact.** Review of the California Department of Forestry and Fire Protection (CAL FIRE) *Fire Hazard Severity Zone (FHSZ) and Local Public Contacts* mapping application depicts the Project area as being within the State Responsibility Area (SRA) which means that the financial responsibility of preventing and suppressing wildfires in the area is primarily the responsibility of CAL FIRE. According to the FHSZ map (effective as of April 1, 2024), the Project area is designated as having both a Moderate and a High Fire Hazard Severity Rating (CAL FIRE, 2024).

The Project area is also served by the Redway Fire Protection District (RFPD) which provides emergency fire, medical, and rescue services to the community of Redway and provides assistance to allied emergency response organizations throughout southern Humboldt and northern Mendocino Counties. The RFPD operates two engines, one water tender, and one quick attack rescue squad with dedicated volunteers (Southern Humboldt Chamber of Commerce, 2025).

The Project does not include construction or new development that would introduce ignition sources, increase the number of people or structures in a fire-prone area, or otherwise exacerbate fire risk. No vegetation clearing, grading, or physical disturbance is proposed. The Project area is primarily developed and accessible via existing local roads that provide adequate emergency ingress and egress under Humboldt County's adopted evacuation and emergency response framework.

Because the Project does not propose new physical development and lies within a Moderate FHSZ with existing emergency access infrastructure, it would not substantially increase wildfire risk or expose people or structures to a significant risk of loss, injury, or death from wildland fires. Therefore, the impact would be less than significant.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Hazards and Hazardous Materials.

X. HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐	☒
i) Result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐	☒
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
iv) Impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

DISCUSSION

The RCSD supplies potable water to the unincorporated community of Redway and surrounding areas through an infiltration gallery located on the bank of the SF Eel River. This gallery captures subsurface flow hydraulically connected to the river and conveys it to a conventional filtration treatment plant for processing and disinfection. The RCSD distribution system includes:

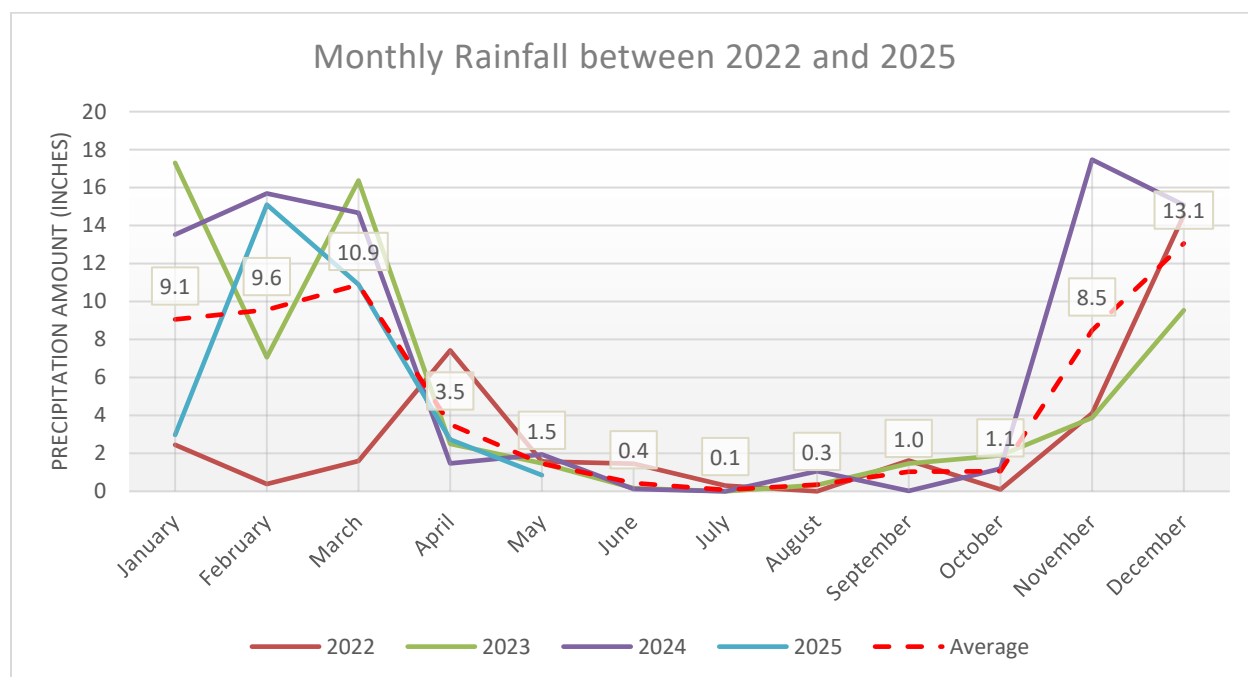
- Three welded-steel storage tanks with a total capacity of approximately 815,000 gallons, consisting of one 275,000-gallon tank, one 440,000-gallon tank, and one 100,000-gallon tank serving the Meadows Industrial Park;
- Two pressure-reduction vaults and one booster pump station; and
- Approximately 30 miles of distribution piping ranging from 1½ inches to 10 inches in diameter, constructed of iron, cement, and plastic pipe (some installed prior to 1950).

This infrastructure allows RCSD to provide potable water service to residential, commercial, and limited industrial users across its established service area. Because the District relies entirely on a single surface-water source, its system is highly sensitive to seasonal flow fluctuations and extended dry periods that affect the SF Eel River's baseflow.

As previously discussed in Section IV (Biological Resources), the SF Eel River is part of the Eel River Hydrologic Unit (HUC 18010105) and is federally designated as a Wild and Scenic River for recreational quality. In addition to this designation, the SF Eel River is also listed on the Clean Water Act (CWA) Section 303(d) impaired waters

list for temperature, sedimentation/siltation, and nutrients, largely attributed to legacy logging activities, road runoff, and natural erosive geology (SWRCB, 2025[b]). The RCSD infiltration gallery is located in an area where subsurface flow filtration naturally reduces turbidity and sediment load before intake, thereby protecting treatment plant operations and minimizing downstream turbidity impacts. RCSD's treatment process is not known to contribute pollutants, erosion, or measurable flow alteration (beyond amounts already authorized).

Precipitation, which is a primary contributor to surface water flows, tends to fluctuate in a predictable way with higher amounts of rainfall in the winter months and lower amounts of rainfall in the summer months. According to rainfall data collected from the PRISM Group (PRISM) for the Redway area, as shown in the graph below, monthly rainfall averages from January 2022 through May 2025 show that the average monthly rainfall can fluctuate from 13.1 inches in December down to 0.1 inches in July.



Source: PRISM Group, 2025.

A review of Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM Panels 060223C1840F, 06023C1980F, and 06023C1985F, all effective November 4, 2016) indicates that the entire length of the SF Eel River in this location is designated as Special Flood Hazard Zone (Zone AE) with designated areas of Zone AE and Zone X encroaching on portions of the SF Eel River bank and lower areas on the western edge of the Redway community (FEMA, 2017). However, no new structures or modifications are proposed within mapped flood hazard areas, and existing water-supply facilities are designed to operate safely under seasonal high-flow conditions. In addition, the Project area is not located within a Department of Water Resources-designated Groundwater Sustainability Plan (GSP) basin under the Sustainable Groundwater Management Act (SGMA), and no groundwater extraction or recharge activities are proposed (DWR, 2025).

RCSD's existing water rights (License No.: 003791 and Permit Nos.: 015665 and 015666) authorize a combined 654.5 afy, though as detailed in Tables 4 and 5, RCSD historically diverts well below these limits. The Project does not propose a change in existing diversion rates or physical points of diversion. Instead, it proposes to align the Place and Purpose of Use for consistency across RCSD's license and permits as well as to license

and permanently dedicate the unnamed spring water right for instream flow enhancements under Water Code Section 1707.

The Project is consistent with the Porter-Cologne Water Quality Control Act (California Water Code, Division 7), which establishes the framework for maintaining and protecting the quality of the State's waters (SWRCB, 2025[c]). Oversight of the SF Eel River and related surface-water resources is provided by the North Coast Regional Water Quality Control Board (NCRWQCB) under its *Water Quality Control Plan for the North Coast Region* ("Basin Plan"). The Basin Plan identifies the SF Eel River as supporting cold freshwater habitat, fish migration, spawning, and municipal supply beneficial uses, and includes numeric and narrative objectives for temperature, sedimentation, and turbidity (NCRWQCB, 2025). The Project would not alter discharge conditions or increase sediment load and would permanently dedicate a portion of flow for instream beneficial use, it is fully consistent with the Basin Plan and the objectives of the Porter-Cologne Act.

Recognizing its dependence on the SF Eel River, RCSD has adopted Ordinance No. 2018-01: Water Conservation Program, establishing a staged framework for demand reduction during periods of limited supply. The ordinance is triggered by declining flow rates as measured by the USGS Miranda Gauge (Station ID: 11476500) or due to infrastructure-related emergencies and includes four escalating conservation stages:

- Stage 1: Seasonal Water Supply;
- Stage 2: Mandatory Conservation Declaration;
- Stage 3: Water Shortage Emergency; and
- Stage 4: Dire Water Shortage.

Types of conservation actions as directed by these stages include, but is not limited to, limiting residential water use to approximately 60 gpd per person per household, restricting irrigation to certain hours, prohibiting non-essential water uses, and suspending new service connections until conditions improve. In regard to maintaining appropriate river flows, the specific conservation strategies and actions required under Stages 1-3 are triggered when river flows fall below 25 cfs, 20 cfs, and 10 cfs, respectively. There is no official river flow amount that triggers Stage 4. Instead, Stage 4 is generally triggered due to State or federal agencies declaring emergencies and requiring conservation measures due to a severe lack of water availability or to catastrophic system failings making it impossible for the RCSD to adequately supply water to its customers.

Additionally, RCSD will not divert more than 5% of streamflow as measured at the USGS gaging station at Miranda. To meet this requirement, RCSD proposes to calculate the maximum diversion amount on a 24-hour basis instead of instantaneous basis, due to the operational limitations of the pumps at the treatment plant. RCSD's water treatment plant contains numerous stages of treatment, each of which is sized to perform at a set range of flows. The raw water pumps have a maximum capacity of 450 gpm. For normal operations, the pumps are run at 350 gpm and the number of minutes they run each day varies based upon the consumption for that day. RCSD will decrease the instantaneous simultaneous pumping rate to match the 5% on an instantaneous basis until the river flow reaches 11.15 cfs, but when the river falls below that flow rate, RCSD will set the pumping rate at 250 gpm and monitor the number of minutes pumped in a 24-hour period to ensure diversion rates stay under 5% of the river's flow during that same 24-hour period.

IMPACT ANALYSIS

X.a) **Less Than Significant Impact.** The Project would not involve any ground disturbance, excavation, or alteration of existing facilities that could generate pollutants or increase sedimentation within the SF Eel River watershed. RCSD's operations would continue under its existing SWRCB appropriative water rights (License No.: 003791 and Permit Nos.: 015665 and 015666), which authorize diversion from the SF Eel River and are already regulated under the Porter-Cologne Water Quality Control Act and the NCRWQCB Basin Plan.

The proposed administrative actions (1) amending the place and purpose of use, (2) extending time for beneficial use, and (3) licensing and permanently dedicating the Unnamed Spring right for instream fish and wildlife enhancement, would not introduce new discharges or change the nature of existing withdrawals. The instream dedication of the spring right would enhance base flows and cool-water input to the SF Eel River, thereby providing a net environmental benefit. The Project would not result in new pollutant sources, increased water usage or wastewater generation, nor are any physical alterations proposed, and, as a result, the Project would not be anticipated to violate water-quality standards or degrade surface or groundwater quality. Additionally, RCSD operations would continue as currently operated, in compliance with its appropriative water rights issued by the SWRCB and all respective requirements, which would ensure potential impacts are minimized. A less than significant impact would occur.

X.b) Less Than Significant Impact. RCSD's infiltration gallery is constructed within alluvial deposits directly connected to surface flow in the SF Eel River. Diversions from the infiltration gallery are considered surface-water appropriations, not groundwater extractions, and therefore do not directly affect underlying aquifers or groundwater sustainability. The Project would not involve new wells, increased pumping rates, or expanded service connections that could influence groundwater levels or recharge dynamics. Because the Project merely updates existing surface-water rights and adds an instream dedication, it would not affect groundwater supplies or impede sustainable groundwater management, and currently operations by the RCSD would continue as currently operated. A less than significant impact would occur.

X.c.i) No Impact. The Project proposes no new construction or grading and would not modify the course of any waterway or change erosion patterns. Existing diversion and conveyance infrastructure would continue to operate as it has historically. No new ground disturbance would occur that could generate siltation or erosion. No impact would occur.

X.c.ii) No Impact. There are no changes to impervious surfaces or storm-drain infrastructure, the Project would not alter runoff characteristics or increase flood potential. The administrative actions do not create new sources of runoff. No impact would occur.

X.c.iii) No Impact. No grading, paving, or new impervious area is proposed. Existing stormwater conditions would remain unchanged, and no new runoff or pollution sources would be generated. No impact would occur.

X.c.iv) No Impact. The infiltration gallery and treatment plant already exist within established facilities and are not being modified. The Project would not construct any features that could obstruct or redirect flood flows within the SF Eel River floodplain. No impact would occur.

X.d) No Impact. The Project does not include construction of new facilities, chemical storage, or pollutant sources within a floodplain, coastal, or lake environment. Existing RCSD infrastructure is designed to operate safely under high-flow conditions and is regularly inspected. There are no coastal or standing-water bodies in proximity to the Project area that could pose tsunami or seiche risks. Because the Project is administrative and does not involve storage of hazardous materials, no release of pollutants would occur in the event of inundation. No impact would occur.

X.e) No Impact. The Project would remain fully compliant with the NCRWQCB Basin Plan, which governs water quality objectives for the SF Eel River and with all SWRCB Water-Rights Division requirements. No part of the Project area lies within a designated Groundwater Sustainability Plan basin under the SGMA. Furthermore, RCSD's existing Water Conservation Ordinance No. 2018-01 establishes staged restrictions triggered by low river flow (e.g., 25 cfs at the Miranda USGS Gauge) to ensure water use is reduced during critical periods—

actions that support, rather than obstruct, regional water-quality and watershed-management objectives. RCSD will not divert more than 5% of streamflow as measured at the USGS gaging station at Miranda. RCSD will decrease the instantaneous simultaneous pumping rate to match the 5% on an instantaneous basis until the river flow reaches 11.15 cfs, but when the river falls below that flow rate, RCSD will set the pumping rate at 250 gpm and monitor the number of minutes pumped in a 24-hour period to ensure diversion rates stay under 5% of the river's flow during that same 24-hour period. Accordingly, the Project would not conflict with or obstruct any adopted water-quality control plan or sustainable groundwater-management plan. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Hydrology and Water Quality.

XI. LAND USE AND PLANNING. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

DISCUSSION

The Project area is in the community of Redway, California, located approximately 0.5 miles west of U.S. Highway 101 within Humboldt County. The RCSD service boundary, which comprises about 768 acres, currently serves around 1,225 residents through 686 connections. The RCSD also provides services to two out-of-agency service connections [YMCA Camp Ravenclyff (water and wastewater), APN: 222-222-004, 16.48 acres; and CAL FIRE Eel River Conservation Camp (wastewater service only), APN: 222-161-002, 175.03 acres]. Land uses within the Project area include a mixture of residential, commercial, industrial, and agricultural uses (see Figure 6).

As shown in Figure 6, specific land uses within the Project area include: Commercial General (CG), Commercial Services (CS), Industrial, General (IG), Mixed Use (MU), Public (P), Public Facility (PF), Residential Agriculture (RA), Residential Low Density (RL), Residential Medium Density (RM). Correspondingly, as shown in Figure 7, zoning designations within the Project area are: Agriculture Exclusive (AE), Agriculture General (AG), Neighborhood Commercial (C-1), Community Commercial (C-2), Community Commercial – Qualified (C-2-Q), Industrial Commercial (C-3), Highway Service Commercial (CH), Flood Plain (FP), Forestry Recreation (FR), Limited Commercial (ML), Residential One-Family (R-1), Residential Two-Family (R-2), Residential Multiple Family (R-3), Apartment Professional (R-4), and Unclassified (U).

The Humboldt County General Plan, adopted in 2017, serves as the primary policy document guiding the County's long-term physical development. It provides the legal and policy framework for all land use decisions and dictates the character, distribution, and location of uses, and must be consistent with the County's Zoning Regulations and other elements, such as Housing and Circulation. The General Plan consists of several mandatory elements, including Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. Specifically, land use and planning decisions within and adjacent to the project area are guided and regulated by the Land Use Element of the General Plan. The County General Plan organizes development by designating Community Planning Areas (CPAs), which contain the most urbanized lands called Urban Development Areas (UDAs) where public infrastructure supports higher-density growth. For the Project area, the relevant CPA is the Garberville/Redway/Benbow/Alderpoint CPA.

Although the Project area is primarily developed with a variety uses, as described above, 18 undeveloped properties or vacant properties not currently served by RCSD for community water service, including 12 parcels located within the Meadows Business Park, have been identified within the Project area to be added to the Places of Use under License No.: 3791 and/or Permit No.: 15665, as summarized below in Table 9 on the following page.

Table 9. Undeveloped Properties within Project Area to be Added to POU

Parcel ID	Assessor's Parcel Number (APN)	Address	Land Use Designation	Zoning Designation	Existing Use/Development	Parcel Size ¹ (acres)
Meadows Business Park Undeveloped Parcels						
1	223-311-018	1380 Evergreen Rd	IG	C-3-D	Public Land, Schools, Non-Taxable Entities	1.16
2	223-311-024	1901 Tunnel Rd	CS	MB-D	Vacant Commercial	1.24
3	223-311-025	1841 Tunnel Rd	CS	MB-D	Vacant Commercial	1.04
4	223-311-026	1781 Tunnel Rd	CS	MB-D	Vacant Commercial	1.10
5	223-311-027	1870 Barnett Rd	CS	MB-D	Vacant Commercial	1.48
6	223-311-028	1901 Barnett Rd	CS	MB-D	Vacant Commercial	1.31
7	223-311-031	1731 Barnett Rd	CS	MB-D	Vacant Commercial	1.59
8	223-311-032	1750 Tunnel Rd	CS	MB-D	Vacant Commercial	1.46
9	223-311-036	1930 Tunnel Rd	CS	MB-D	Vacant Commercial	1.17
10	223-311-037	1980 Tunnel Rd	CS	MB-D	Vacant Commercial	1.22
11	223-311-041	--	RA5-20	AG-B-5(5)	Vacant Commercial	24.41
12	223-311-045	1381 Evergreen Rd	CS	MB-D	Vacant Commercial	2.64
Additional Undeveloped Parcels						
13	222-151-004	--	RA40-160	FP	Rural - Vacant	13.01
14	222-151-005	--	RA5-20	AG-B-5(5)	Rural - Vacant	62.32
15	223-171-018	--	PF	U	Rural - Vacant	17.21
16	223-171-019	--	RA40-160	FP	Rural - Vacant	4.06
17	223-171-020	--	RA40-160	FP	Rural - Vacant	1.02
18	223-171-021	--	CG; RA5-20	AG-B-5(5); FR	Rural - Vacant	40.73

At this time, no known development is proposed on the properties, nor is any development proposed under the Project. As previously noted, any development to occur subsequent to the Project would be evaluated at the time a formal application is submitted to the respective regulatory agency(ies) to assess potential environmental impacts pursuant to CEQA. Notably, development of some of the undeveloped properties is likely cost prohibitive due to site constraints, such as steep slopes. However, for the purposes of this Initial Study, potential future development of these properties is considered with respect to the properties' current land use and zoning designations and associated allowable uses, although future development of these properties is entirely speculative at this time.

If and when future development is proposed on the undeveloped properties, it would likely be consistent with surrounding development and compatible with the allowable uses identified in the properties' respective land use and zoning regulations. Such allowable uses would allow for a variety of residential, commercial, industrial, and agricultural uses, none of which would be expected to be extremely high water users. As previously discussed and shown in Table 4, the maximum beneficially used diversion through the SF Eel River infiltration gallery occurred in 2011, where all water used by customers (252.23 afy) was derived from the SF Eel River under the appropriative license and permit, respectively. As shown in Figure 8, diversion amounts since that time have steadily decreased due to conservation efforts implemented by the RCSD, with the diversion amount for 2023 reported at approximately 172.23 afy (approximately 80 af less than the 2011 diversion amount). As such, should development of these undeveloped properties occur subsequent to the Project, further assessment would occur at the time a formal application is submitted.

IMPACT ANALYSIS

xl.a) **Less Than Significant Impact.** The proposed Project involves administrative changes to existing water rights and the dedication of a water source for instream use; no development is proposed. The Project does not require any new construction, road closures, or installation of physical barriers that could sever pedestrian, bicycle, or vehicular connections. All affected areas, including the parcels at the Meadows Business Park and the existing water infrastructure, are already served by the Redway CSD and are located within the established, community core. Therefore, the administrative action of updating water rights will not physically divide an established community. A less than significant would occur.

xl.b) **Less Than Significant Impact.** The Project is an administrative action intended to formally align existing water rights with current, long-standing uses. The Project does not propose any change in land use or zoning and will not require new construction or development that could conflict with the existing land use or zoning designations in the Project area. Therefore, the Project is consistent with all relevant land use regulations and does not cause a significant impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Any future development to occur subsequent to the Project would be evaluated at the time a formal application is submitted to ensure potentially significant impacts are minimized with application of feasible and appropriate mitigation, as necessary. A less than significant impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have a **Less Than Significant Impact** on Land Use and Planning.

XII. MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

DISCUSSION

According to Chapter 10 (Conservation and Open Space Elements) of the County of Humboldt General Plan, gold historically held prominence within the County, while current mineral production, used for infrastructure development, predominantly consists of sand, gravel, and rock, sourced from over 90 extraction sites, including both in-stream operations and more than 30 active quarries (County of Humboldt, 2017[a]).

The Surface Mining and Reclamation Act (SMARA), a comprehensive State law enacted to ensure the proper management of California's mineral resources and the reclamation of mined lands, mandates statewide standards for mining operations and subsequent land reclamation [County of Humboldt, 2017(b)]. Humboldt County, through its Surface Mining and Reclamation Act Ordinance, enforces these provisions, which also delineate environmental protection standards aimed at preventing new mining activities from generating nuisances related to traffic, noise, water quality, or visual degradation [County of Humboldt, 2017(b)].

According to the Department of Conservation (DOC), the Project area is not located in an area of known rock, aggregate, sand, or other mineral resource deposits of local, regional, or State residents (DOC, 2015). Furthermore, the Project area is not utilized for Surface Mining and Reclamation Act (SMARA) activities. The nearest quarry to the Redway CSD boundary is located approximately 0.27 miles southwest (County of Humboldt, No Date).

IMPACT ANALYSIS

XII.a-b.) **No Impact.** The Project area does not contain mineral resources that are of value locally, to the region, or to residents. Additionally, the Project area is not identified as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, the proposed Project would not interfere with materials extraction or otherwise cause a short-term or long-term decrease in the availability of mineral resources. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Mineral Resources.

XIII. NOISE. Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) For a project located within the vicinity of private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

DISCUSSION

Noise is generally defined as unwanted or excessive sound that can interfere with normal human activities. Sound levels are typically measured in A-weighted decibels (dBA), which approximate how the human ear perceives different frequencies. According to the Humboldt County General Plan Noise Element (2017), ambient noise levels in rural and unincorporated portions of the County are generally low, typically below 55 dBA Ldn in areas distant from major roadways, and may increase to approximately 60 dBA Ldn near small town centers or along local highways such as U.S. 101 and Redwood Drive (County of Humboldt, 2017[a]).

The Redway Community Services District (RCSD) service area lies within the unincorporated community of Redway in southern Humboldt County, adjacent to the SF Eel River and State Highway 101 (101). The Humboldt County General Plan Chapter 13 Noise Element Table 13-A, lists Redway as having no prominent noise sources from airports, railroad, or other known stationary sources, identifying Redwood Drive as the singular described prominent noise source within the unincorporated community of Redway (County of Humboldt, 2017[a]). Surrounding land uses can be summarized to include low-density residential neighborhoods, small commercial establishments along Redwood Drive, and forested open space. Ambient noise sources primarily include local vehicular traffic, limited commercial activity, and natural sounds such as wind and flowing water.

The proposed Project consists entirely of administrative actions associated with existing water rights—specifically, modification of the Place and Purpose of Use for two existing appropriative rights, an Extension of Time for beneficial use documentation, and a dedication of an unused spring right for instream flow. As described in the Project Description, no physical alterations, construction, or operational changes to existing RCSD infrastructure are proposed. RCSD's existing facilities (water treatment plant, pump stations, and storage tanks) would continue operating under current conditions.

IMPACT ANALYSIS

XIII.a) **No Impact.** The Project involves only administrative amendments to existing State-issued water rights. No construction, equipment operation, or physical modification would occur. RCSD's existing treatment and pumping facilities would continue operating as they currently do, generating no new or increased noise. The Project would therefore not cause a temporary or permanent increase in ambient noise levels, no impact would occur.

XIII.b) **No Impact.** Because no earth-moving or structural activities are proposed, there would be no potential for increased or new groundborne vibration or noise. No impact would occur.

XIII.c) **No Impact.** Per review of the *Humboldt County Airport and Land Use Compatibility Plan* (adopted April 13, 2021), the Project is not located within an airport land use plan (HumCo, 2021). The nearest private or commercial airport to the Project area is the Garberville Airport located approximately 1.7 miles south of the Project area. The Garberville Airport is a GA facility with a single north-south oriented asphalt runway (18-36) measuring 2,783-feet long and 75-feet wide (HumCo, 2021).

The Project would not involve the construction or operation of tall structures, lighting, or uses that could interfere with aviation operations. Therefore, no impact related to airport hazards or excessive aircraft noise exposure would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Noise.

XIV. POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and/or businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

DISCUSSION

Humboldt County's General Plan serves as the primary policy document guiding physical development in the unincorporated areas of the county. The plan sets forth goals, policies, and standards to manage growth and protect resources while meeting housing needs. The Housing Element (adopted August 2020, with a planning horizon through August 2027) identifies existing and projected housing needs, evaluates constraints, and outlines programs to meet the Regional Housing Needs Allocation (RHNA) assigned to the county. The county's land use policies and zoning regulations implement the objectives of the Housing Element to ensure orderly development, support housing production, and address affordability challenges.

Within Humboldt County, the total estimated population is approximately 133,817 which is a 0.1 percent decrease from the previous year (California Department of Finance, 2025). The community of Redway has an estimated population of 1,276 residents as of 2023 (Data USA, No Date). In 2025, the estimated total housing units in unincorporated Humboldt County is approximately 63,765 units, a 0.6 percent increase from the previous year (California Department of Finance, 2025). About 52 percent of units are owner-occupied, and 48 percent are renter-occupied in Redway (Data USA, No Date). Under the Regional Housing Needs Allocation (RHNA) for the 2019–2027 planning cycle, the County must accommodate 1,413 new housing units, including 175 extremely low, 176 very low-income, 223 low-income, 256 moderate-income, and 583 above-moderate-income units (County of Humboldt, 2019). Progress toward meeting these allocations has been limited, with only a portion of these units completed or entitled to date (County of Humboldt, 2019).

IMPACT ANALYSIS

XIV.a) **No Impact.** The Project is an administrative action that seeks to align existing water rights with uses that have been in place for decades, such as providing service to the Meadows Business Park since 1998. The Project does not propose any new homes, businesses, or physical construction. The Project would not result in increased water withdrawal or the extension of new water infrastructure to undeveloped areas. The proposed action merely formalizes the water rights to reflect the existing service area, which is part of the County's designated Urban Development Area (UDA) for planned growth. Therefore, the Project would not directly or indirectly induce unplanned population growth and no impact would occur.

XIV.b) **No Impact.** The Project consists solely of administrative filings with the SWRCB and involves no physical development, demolition, or land use conversion. All affected water facilities are pre-existing infrastructure, and the expanded Place of Use formalizes service to parcels, including the Meadows Business Park, that have been occupied and served for years. Consequently, the Project will not displace any existing people or housing, nor will it necessitate the construction of replacement housing.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Population and Housing.

XV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

DISCUSSION

As previously discussed, the Project is for administrative amendments to the RCSD's existing water rights with the SWRCB, including an expansion in Place of Use (POU), an Extension of Time petition, and the dedication of an unnamed spring diversion for instream flow.

Fire Protection

The overall fire protection responsibility in Humboldt County is split between local agencies and State entities. The local response is primarily handled by volunteer fire protection districts, who respond to structural fires within established communities, wildland fires, vehicle accidents, and medical aid calls. The California Department of Forestry and Fire Protection (CAL FIRE) assumes responsibility for wildland fire protection on State Responsibility Areas (SRA), which cover most of the rural, privately owned lands. Generally, the Fire Hazard Severity Zones (FHSZ) across Humboldt County are distributed with approximately 45 percent of the area classified as 'Very High' and 48 percent as 'High' (County of Humboldt, 2017). Specifically, the community of Redway shows that the developed community core is predominantly designated as 'Moderate', while the surrounding outlying areas and hillsides are classified as 'High' (Humboldt County Web GIS, No Date). Additionally, the community of Redway and the Project area fall within the service territory of the Redway Fire Protection District (Redway FPD). The Redway FPD is identified as a Volunteer organization, operates with one fire station, and covers an area of 12 square miles (County of Humboldt, 2017). The additional parcels added to the POU are within the boundaries for the Redway FPD.

Police Protection

Law enforcement services for the unincorporated Redway area are provided by the County of Humboldt Sheriff's Department (County of Humboldt, 2017). The community does not have an immediate, dedicated Sheriff's Substation, relying on deputies dispatched from the wider Southern Humboldt region for emergency response. The nearest Sheriff's Substation is located in Garberville, approximately 0.8 miles from the Project area (Google Earth Pro, 2025).

The County of Humboldt Sheriff's Office is a comprehensive public safety agency responsible for a variety of community services (Humboldt Sheriff's Office, No Date). It is made up of multiple divisions which all have a special responsibility. This includes the Custody Services Division, which manages the 417-bed Humboldt County Correctional Facility (HCCF) in Eureka, and the Administrative Services Division, which handles support functions like records, officer training, evidence management, and financial services. Criminal investigation of major felonies is conducted by the Major Crimes Division, while the Emergency

Communications Center (Dispatch) operates the multi-channel radio system and answers 911 calls, transferring fire and medical calls as needed. Additional specialized functions include the Coroner - Public Administrator, the Court Services Division, and the Special Operations units, which include the Boating Safety Program for waterways enforcement and the Marijuana Enforcement Team (MET) for investigating cultivation violations.

Schools

According to the Humboldt County Web GIS (No Date), Redway falls within the Southern Humboldt Joint Unified School District. The Southern Humboldt Joint Unified School District (SHJUSD) operates across both Humboldt and Mendocino counties (SHJUSD, No Date). The SHJUSD currently serves a student enrollment of 652 across its facilities, which include Redway Elementary School (K-6), Whitethorn Elementary School (K-6), Casterlin Elementary School (K-8), Miranda Junior High School (7-8), Casterlin High School (9-12) and South Fork High School (9-12), and an alternative educational program, Osprey Learning Center, which includes a K-12 Independent Study program and a Continuation High School.

Additionally, higher education institutions, specifically College of the Redwoods (CR) and Cal Poly Humboldt, are situated within Humboldt County. The CR campus is located approximately 43 miles from the project area. The CR operates several campuses and instructional sites across its service area, which includes Del Norte, Humboldt, and parts of Trinity counties [CR, No Date (a)]. The main campus is situated south of Eureka, California, at 7351 Tompkins Hill Road. Facilities on the main campus include various academic buildings (such as Science, Humanities, and Applied Technology), a Learning Resource Center (housing the library and academic support services), student services and administration offices, a performing arts theater, physical education facilities, a child development center, campus safety services, and on-campus housing [CR, No Date (b)].

In addition to the main Eureka campus, CR extends its reach through:

- The Del Norte Education Center in Crescent City.
- The Klamath-Trinity Instructional Site located on the Hoopa Indian reservation.
- The Eureka Downtown Instructional Site, which primarily hosts Workforce & Community Education Programs.

CR offers a range of Associate of Arts and Associate of Science Degrees, along with various career technical certificates. It also provides comprehensive student support services, including financial aid, transfer assistance, basic needs support, and numerous student organizations and specialized support programs.

Cal Poly Humboldt is a public university located in Arcata, California, within a setting characterized by redwood forests, surrounding mountains, and proximity to Humboldt Bay and the Pacific Ocean. It is approximately 53 miles from the project area. Cal Poly Humboldt also maintains additional instructional course at the Klamath-Trinity Instructional Site on the Hoopa Indian Reservation (Hoopa Valley Tribe, 2023). Cal Poly Humboldt offers a broad spectrum of degrees, including 63 bachelor's programs, 15 graduate programs, and 4 credential programs (Cal Poly Humboldt, No date). The student body comprises approximately 6,045 undergraduates with a student-faculty ratio of 16:1 (Cal Poly Humboldt, No date).

Parks

According to Chapter 10 (Conservation and Open Space Element) of the General Plan (2017[a]), the County of Humboldt has over 550,000 acres of protected open space, forests, and recreational areas which includes 4 federal parks/beaches, 10 state parks, and 16 county parks/beaches, recreational areas, and reserves. The proposed Project is located near several recreational facilities, including the John B. Dewitt Redwoods State Natural Reserve, situated 706 feet to the east, and neighborhood parks such as Tooby Memorial Park,

Southern Humboldt Community Park, and Tooby Park Skate Park, all located approximately 1.71 to 2.2 miles southwest of the Site (Google Earth Pro, 2025).

Other

Other public facilities and services provided within Redway include library services and community services. The Garberville Library serves the community of Redway as a branch of the Humboldt County Library system [County of Humboldt, No Date(a)]. It is located at 715 Cedar Street in Garberville. It is located approximately 0.8 miles for the southern boundary of the Site. The library offers various services and resources, including public internet access, free Wi-Fi, and the ability to pick up and drop off books ordered from other participating libraries within the County system. It also hosts special events, such as a summer reading program for children and story times. The library is supported by a "Friends of the Library" organization which conducts activities like an annual used book sale and offers volunteer opportunities.

IMPACT ANALYSIS

XV. a-e) **No Impact**. No residential units will be constructed, nor is the population expected to increase, as a result of the proposed Project. Because the proposed Project would not create a need for a new or physically-altered fire, police, park, hospital, or library facility, the proposed Project would not result in adverse physical impacts associated with the construction of public service facilities.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Public Services.

XVI. RECREATION. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

DISCUSSION

According to the Community Infrastructure and Services Element of the County of Humboldt General Plan, Humboldt County is characterized by extensive open spaces and numerous parks. The County contains federal and State parks, 16 County parks and beaches operated by the Humboldt County Parks Division, recreational areas and reserves, city parks, and parks operated by special districts and non-profit organizations (County of Humboldt, 2017[a]).

The proposed Project is located in the vicinity of the following neighborhood parks and recreational facilities:

- John B. Dewitt Redwoods State Natural Reserve, 706 feet east.
- Tooby Memorial Park, located approximately 1.71 miles southwest.
- Southern Humboldt Community Park, located approximately 2.06 miles southwest.
- Tooby Park Skate Park, located approximately 2.2 miles southwest.

IMPACT ANALYSIS

XVI.a-b) **No Impact.** No residential units would be constructed, nor is the population expected to substantially increase, as a result of the proposed Project. There would not be an increase in the usage of and/or demand for neighborhood and regional parks or other recreational facilities. Therefore, the proposed Project would not result in the physical deterioration of parks or facilities, nor would they require the construction of new park or recreational facilities. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Recreation.

XVII. TRANSPORTATION. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

DISCUSSION

The Circulation Element of the County of Humboldt General Plan (2017[a]) provides the framework for existing and proposed major thoroughfares, transportation routes, terminals, and other local transportation facilities, including roads, public transportation, and multimodal options like bicycle and pedestrian travel. The Circulation Element is fundamentally correlated with the Land Use and Housing Elements to ensure that all development is adequately served by the transportation system without compromising safety or functionality. The County's roadway network includes 1,400 miles of County-maintained roads and city streets, 378 miles of state highways (including U.S. 101), and numerous federal roadways. The performance of the County's roadways is measured by Level of Service (LOS), a qualitative rating that determines traffic flow and congestion. To assess traffic conditions and vehicle volumes, the Circulation Element utilized the Humboldt County Travel Model (HCTM). The HCTM is a transportation demand model that forecasts traffic impacts and assesses a roadway's LOS (or peak hour performance) by assigning a letter grade from 'A' to 'F' as a measure of congestion. The governing standard requires maintaining LOS C operation on most roadways, with LOS D (indicating reduced speed and maneuverability) being the acceptable minimum only on U.S. Highway 101.

The Variety in Rural Options of Mobility (VROOM) 2022–2042 is the Humboldt County Association of Governments (HCAOG) Regional Transportation Plan (RTP), a long-range document covering a 20-year planning horizon. Its central goal is to achieve a carbon-neutral, multi-modal transportation system that is safe, sustainable, and equitable, and addresses issues like climate change, safety, and land use. VROOM prioritizes a shift away from single-occupancy vehicles toward walking, biking, and transit through Complete Streets policies and building integrated transit and trail networks. It aims to reduce Vehicle Miles Traveled (VMT) per capita by at least 25 percent by 2030. According the VROOM RTP, the community of Redway is located along the corridor served by the Southern Humboldt Intercity transit system, which is operated by the Humboldt Transit Authority (HTA). This fixed-route service connects Redway to Garberville, Eureka, and other communities six (6) days a week during peak morning and afternoon travel times.

U.S. Highway 101, a major state highway, is located adjacent to the Project area. Within the community of Redway, circulation is distributed by two major collector roads: Redwood Drive and Briceland Road. Redwood Drive functions as a minor collector road, providing connectivity between Briceland Road and Redwood Drive. The project area also contains various other local roads for community access. The single public transit stop in Redway is located at the intersection of Redwood Drive and Briceland Road.

IMPACT ANALYSIS

XVII.a) **No Impact.** The proposed Project is an administrative action to amend and dedicate existing water rights. No physical construction, new development, or alteration to circulation facilities is proposed. The proposed Project would not introduce new traffic, increase the service population, or change the land use designations that would conflict with a program, plan, ordinance or policy addressing the circulation system. Furthermore, the proposed is would not conflict with the goals and policies of the Circulation Element of the County of Humboldt General Plan and the VROOM RTP. Therefore, no impact would occur.

XVII.b) **No Impact.** CEQA Guidelines Section 15064.3(b) mandates that transportation impacts be measured by Vehicle Miles Traveled (VMT) and a focus on reducing VMT. The proposed Project is administrative and does not include any physical development that would generate new vehicle trips or induce growth. Therefore, the Project is consistent with and does not conflict with VMT reduction strategies. No impact would occur.

XVII.c) **No Impact.** Since the proposed Project is administrative and non-physical, it does not involve the construction or modification of any roadways. It would not introduce new geometric design features and would not introduce or alter uses that could be incompatible with existing circulation. As such, no impact would occur.

XVII.d) **No Impact.** The proposed Project would not affect emergency access as it would not require construction or temporary road closures. As discussed above, the proposed Project includes formalizing water rights which would not alter the physical design or function of U.S. Highway 101, Redwood Drive, Briceland Road, or any other local roads that provide community or emergency access. Therefore, no impact on emergency access would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Transportation.

XVIII. TRIBAL CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k)?	☐	☐	☐	☒
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

DISCUSSION

The Tribal Cultural Resources section identifies and evaluates a proposed project's potential impacts on Tribal Cultural Resources (TCRs), a distinct category of cultural resources established under CEQA by Assembly Bill 52 (AB 52), effective July 1, 2015. TCRs, as defined by Public Resources Code (PRC) Section 21074 (added by AB 52), include sites, features, places, cultural landscapes, sacred places, and objects of cultural value to a California Native American tribe. A resource can be considered a TCR if it is listed, or is eligible for listing, in the California Register of Historical Resources (CRHR) or a local register of historical resources. Alternatively, a resource may be determined to be a TCR if the lead agency, in its discretion and supported by substantial evidence, determines that the resource meets the definition of a TCR. This determination often involves considering whether the resource is a site, feature, place, cultural landscape, sacred place, or object that is traditional or cultural in nature to a California Native American tribe.

TCRs hold intangible cultural value to California Native American tribes, representing their heritage, traditions, and spiritual connections to the land. Unlike some archaeological or historical resources, TCRs may not always be evident through surface surveys or known to non-tribal cultural resource professionals. Therefore, their identification relies significantly on formal consultation with California Native American tribes, which is a key requirement of AB 52. The consultation process ensures that tribal perspectives, traditional knowledge, and unique cultural concerns are respectfully considered and integrated into the environmental review to ensure the adequate protection cultural assets.

The Applicant has defined the APE as the approximately 867.2-acre Project area, shown on Figure 1 above, as the area that is associated with the RCSD jurisdictional boundary, in addition to an existing out-of-agency service connection located immediately north of the jurisdictional boundary, for the purpose of amending two existing water rights, including an appropriative license and an appropriative permit.

Native American Heritage Commission Outreach

On September 16, 2025, LACO Associates (LACO), on behalf of the Applicant, contacted the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and the contact information for the representatives of the Native American tribes associated with the Project area. On September 16, 2025, a response was received from the NAHC, which indicated that the results of the Sacred Lands File (SLF) search were negative. Included with the letter was a Native American contact list of tribes who may have knowledge of cultural resources in the Project area. One tribal contact is included on the NAHC contact list, which includes the representative from the Bear River Band of Rohnerville Rancheria.

Tribal Outreach

On September 29, 2025, RCSD staff sent a letter to the Bear River Band of Rohnerville Rancheria (Tribe) to inform them of the proposed Project and offered consultation in accordance with Public Resources Code §21080.3.1. As of the date of this Initial Study, no response from the Bear River Band of the Rohnerville Rancheria nor any additional responses or comments have been received.

IMPACT ANALYSIS

XVIII.a.i) **No Impact.** The Native American Heritage Commission (NAHC) was contacted on September 16, 2025, and on that same date, the Sacred Lands File (SLF) search yielded negative results. Furthermore, since no physical ground disturbance or demolition is proposed as part of this Project, there is no potential for the project to cause a substantial adverse change to the significance of any known or unknown resource eligible for listing in the California Register of Historical Resources or a local register. No impact would occur.

XVIII.a.ii) **No Impact.** The RCSD received contact information for the Bear River Band of Rohnerville Rancheria from the NAHC. As of the date of this Initial Study, no response from the Bear River Band of the Rohnerville Rancheria nor any additional responses or comments have been received. Since the Project is administrative and non-physical, the Project will have no impact on the cultural value or integrity of any site, feature, place, or sacred area. Therefore, the proposed Project negates any potential for an adverse change to a TCR as defined by the Public Resources Code. No impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Tribal Cultural Resources.

XVIX. UTILITIES AND SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

DISCUSSION

The Project area is comprised of 867.2 total acres in the unincorporated community of Redway, California. The RCSD jurisdictional boundary spans a total of 768 acres. The proposed Place of Use (747.3 acres) includes portions of the RCSD jurisdiction boundary, in addition to an existing out-of-agency service connection located immediately north of the jurisdictional boundary. Under the Project, administrative actions are proposed to amend existing water rights and dedicate a spring diversion for instream flow.

Water

The RCSD was established in 1965 from a private water system and later integrated the Redway Sanitary District in 1977. The RCSD's primary goal is to provide safe, clean drinking water to its residents. The South Fork of the Eel River serves as the single source of water supply for the community. The RCSD operates a conventional filter water treatment plant and maintains four storage tanks with a combined capacity of approximately 840,000 gallons. This includes a 440,000-gallon and 275,000-gallon welded steel tanks, a 100,000-gallon concrete tank that provides storage for the Meadows Business Park; and a 25,000-gallon chlorine contact time (CT) concrete tank. The system also relies on two pressure reduction vaults and one booster pump station. The RCSD maintains approximately 30 miles of distribution piping, consisting of iron, cement, and plastic pipe, with a size range of 1½ to 10 inches. As of 2019, the RCSD provides service to 686 total connections, supporting a population of roughly 1,225 residents (Humboldt LAFCo, 2023). The proposed Project, being administrative, would have no impact on water usage or storage that would require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities.

Wastewater

The RCSD provides wastewater treatment to approximately 93 percent of household and business users. The wastewater collection network incorporates both gravity mains and five lift stations, along with one aerial crossing. RCSD's wastewater treatment plant (WWTP) utilizes a 300,000-gallon oxidation ditch, clarification, and a chlorination/dechlorination system. The WWTP's permitted design flow capacities are 186,000 gpd during dry weather and a peak of 615,000 gpd during wet weather. The WWTP typically operates at approximately 75 percent capacity for both dry and wet weather, with average flows ranging from 140,000 gpd in dry conditions to 430,000 gpd in wet conditions. Effluent is normally discharged to upland percolation ponds but flows exceeding 350,000 gpd during winter are diverted to the Eel River.

Electric and Natural Gas

The proposed Project is administrative in nature and thus anticipates no changes to electricity and natural gas services within the Project area.

Stormwater

Stormwater is managed by the County of Humboldt, as tasked by the U.S. EPA and the SWRCB, to reduce the discharge of pollutants into the environment. It is managed under the small MS4 Permit (Phase II Permit), which applies to stormwater discharges from municipal separate storm sewer systems in specific population centers, including McKinleyville, the unincorporated Eureka area, and Shelter Cove. Compliance is mandatory for industrial facilities and construction activities under the Industrial General Permit (IGP) and Construction General Permit (CGP), respectively), from construction-related activities (the Construction General Permit [CGP]), and areas administered by the small MS4 Permit). The proposed Project is administrative in nature and thus anticipates no changes to stormwater collection or to existing systems within the Project area.

Solid Waste

The County of Humboldt Public Works Division of Solid Waste manages waste according to an integrated approach that emphasizes waste reduction, recycling, reuse, and safe disposal, guided by State and County ordinances [County of Humboldt, No Date (b)]. The County pursues a "Zero Waste Ambition" and administers collection services through franchise agreements with private companies like Recology and Humboldt Sanitation. Waste infrastructure includes maintenance and monitoring of the closed Table Bluff Landfill and the Redway Transfer Station facilities. The proposed project does not anticipate any changes to the current solid waste services within the Project area.

IMPACT ANALYSIS

XVIX.a) **No Impact.** The proposed Project is an administrative action to correct, and dedicate existing water rights. No new physical development or increased water withdrawal is proposed, nor would the Project require the need for new utility extensions. Although the proposed Project would amend the existing Places of Use under License No. 003791 and Permit No. 015665, associated with the SF Eel River, the areas to be added to the Place of Use are already being served by the RCSD. No change to the LAFCo jurisdictional boundary is proposed under the Project. Since the proposed Project will not result in a direct or indirect increase in demand for water, wastewater, stormwater, electric power, natural gas, or telecommunications services, it does not require the construction or relocation of any associated facilities. No impact would occur.

XVIX.b) **Less Than Significant Impact.** The proposed Project focuses on correcting the boundary associated with existing water rights to include the Meadows Business Park, which has many parcels that have been served since 1998. As mentioned above, the proposed Project would not increase water diversion. The total allowable diversion amount would be reduced from 602.5 afy to 252.23 afy from the SF Eel River. Furthermore, the proposed Project includes permanently dedicating 52 afy from the unnamed spring for instream use. As

water supplies are allocated for existing uses and any new service connection requests would only be allowed if within the licensed diversion amount authorized by the SWRCB. The proposed Project would not induce growth that would necessitate new supplies, therefore, a Less than Significant Impact is anticipated.

xvix.c) **No Impact.** The proposed Project is administrative and does not include any residential or commercial development. As there is no proposed increase in population or business activity associated with the proposed Project, there will be no increase in wastewater generation. Therefore, the Project will not impact the capacity of RCSD. No impact would occur.

XVIX.d) **No Impact.** Since the proposed Project is administrative and requires no construction or physical development, it will not generate any solid waste or increase the existing demand for solid waste disposal services. It will therefore not impact the capacity of local infrastructure or impair solid waste reduction goals. No impact would occur.

XVIX.e) **No Impact.** The proposed Project will not generate solid waste. Therefore, the Project would not interfere with federal, State, and local management and reduction statutes and regulations related to solid waste. As such, no impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Utilities and Service Systems.

XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage challenges?	☐	☐	☐	☒

DISCUSSION

In Humboldt County, the overall responsibility for fire protection is divided between local agencies and state entities (County of Humboldt, 2017). Volunteer fire protection districts respond to structural fires within established communities, wildland incidents, vehicle accidents, and medical aid calls. The California Department of Forestry and Fire Protection (CAL FIRE) manages wildland fire protection specifically for State Responsibility Areas (SRA), which encompass the majority of rural, privately owned land. Generally, the Fire Hazard Severity Zones (FHSZ) across Humboldt County are distributed with approximately 45 percent of the area classified as 'Very High' and 48 percent as 'High' (County of Humboldt, 2017). The unincorporated community of Redway, including the project site, falls under the Redway Fire Protection District (Humboldt County Web GIS, No Date). The District maintains 1 fire station and encompasses a service area of 12 square miles. Redway is classified as 'Moderate' FHSZ, while the surrounding hillsides and outlying areas are classified as 'High' FHSZ.

Furthermore, the Humboldt County Community Wildfire Protection Plan (CWPP) is the countywide strategic document, overseen by the Humboldt County Fire Safe Council (HCFSC), designed to mitigate potential wildfire losses in all vulnerable communities. The CWPP incorporates fire risk information such as the impact of rugged topography, dense fuel loads, forest diseases, and climate change, which contribute to a generally high fire risk during dry periods. The CWPP meets federal requirements by establishing a collaborative process, prioritizing hazardous fuel reduction areas, and identifying actions to reduce structural ignitability. It serves to guide residents, fire management agencies, policymakers, and planners through goals focused on ignition prevention, preparedness, disaster response, and the restoration of beneficial fire practices.

IMPACT ANALYSIS

XX.a) **No Impact.** The Project would not result in any impairment to adopted emergency response or evacuation plans. The proposed Project is limited to administrative filings, and no new development, permanent construction, road alterations, or physical barriers are proposed that could physically obstruct ingress or egress for emergency vehicles or impede public evacuation routes. Furthermore, the proposed Project would not induce new population growth or increase the number of residents dependent on the existing evacuation infrastructure, thus maintaining current service standards and consistent with CWPP and the County General Plan. No impact would occur.

XX.b) **No Impact.** The proposed Project would not exacerbate wildfire risks or increase exposure to pollutants. The Project would not involve the construction or occupancy of any new structures in the moderate or high FHSZ areas. It would not require vegetative clearing or alteration to ground cover that would increase fire fuel loading or change fire behavior due to localized factors like slope or prevailing winds. Since no new construction is introduced, there would be no new project occupants exposed to pollutant concentrations from a wildfire, and the proposed Project activities themselves would not generate new ignition sources or contribute to the uncontrolled spread of fire. As such, no impact would occur.

XX.c) **No Impact.** No installation or expansion of infrastructure is proposed. The proposed Project seeks only to formalize rights for existing water sources serving the established service area. The proposed Project would not result in increased water withdrawal or the extension of new infrastructure, such as roads, utilities, fuel breaks, or emergency water sources, into undeveloped lands. Therefore, the proposed Project will not create new potential fire ignition points (e.g., through new power lines) or result in any temporary or ongoing environmental impacts associated with infrastructure construction and maintenance. No impact would occur.

XX.d) **No Impact.** The proposed Project would not increase exposure to post-fire risks. As an administrative action, the proposed Project does not include site grading, changes to existing slope profiles, or alteration of surface drainage patterns. Consequently, the proposed Project would not create conditions that would increase the potential for runoff, post-fire slope instability, or downslope/downstream flooding following a wildfire event, ensuring existing people and structures are not exposed to new or intensified geological hazards. Therefore, no impact would occur.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **No Impact** on Wildfire.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☐	☒	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

XXI.a) **No Impact.** The Project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. The proposed Place and Purpose of Use modifications are administrative changes in area and do not include modifications to the amount nor rate at which water would continue to be diverted for use within the community of Redway. The Project does not propose physical changes to areas considered to provide habitat for any fish species or plant and animal communities. The Petition for an Extension of Time by the RCSD is also an administrative action, intended to ensure consistency associated with the SF Eel River appropriative permit (Application No.: A023017; Permit No.: 015665) to ensure sufficient diversion amounts would be allowed and available to serve RCSD service connections once the future appropriative license is obtained and the unnamed spring is dedicated to instream and recreational uses. The spring diversion licensing and instream flow dedication includes obtaining a license through the SWRCB to retain the allocated diversion amount already permitted. The RCSD has not diverted from this spring since 2008 although permitted to do so. The reason for this administrative change is to enable the RCSD to properly dedicate their allocated diversion amount (amount) for instream use, benefiting fish and wildlife preservation and enhancing ecological health and recreational uses.

Additionally, there are no known important examples of California pre-history located on-site. LACO contacted the NAHC on behalf of the Applicant to request a SLF search and related contact information for Native American tribes associated with the project area. The SLF search was negative, and only the Bear River Band of Rohnerville Rancheria was detailed as being associated with the Project area. The Applicant subsequently reached out to the Tribe to inform them of the proposed Project and offered consultation in accordance with Public Resources Code §21080.3.1. As of the date of this Initial Study, no responses or comments have been received. No impact would occur through approval and adoption of the proposed Project.

XXI.b) **Less Than Significant Impact.** No significant cumulative impacts have been identified as a result of the proposed Project. The analysis included in this Initial Study found that all potential impacts associated with the Project and foreseeable potential future impacts within the Project area would have a less than significant impact. As such, individual impacts from the proposed Project would not significantly contribute to cumulative impacts in the area. A less than significant impact would occur.

XXI.c) **Less Than Significant Impact.** The proposed Project would not generate any potential direct or indirect environmental effect that would have a substantial adverse impact on human beings including, but not limited to, exposure to geologic hazards, air quality, water quality, traffic hazards, noise, and fire hazards. As proposed, the Project would have a less than significant impact.

MITIGATION MEASURES

No mitigation required.

FINDINGS

The proposed Project would have **a Less Than Significant Impact** on Mandatory Findings of Significance.

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APPENDIX A

Water Rights Documentation



STATE OF CALIFORNIA—DEPARTMENT OF PUBLIC WORKS
DIVISION OF WATER RESOURCES
STATE ENGINEER

Notice of Change (Over)

License for Diversion and Use of Water

APPLICATION 11876

PERMIT 7489

LICENSE 3791

THIS IS TO CERTIFY, That

Redway Water Company

c/o A. E. Smythe

P.O. Box 275

Redway, California

has made proof as of July 15, 1952

(the date of inspection) to the satisfaction of the State Engineer of California of a right to the use of the water of South Fork Eel River in Humboldt County

tributary to Eel River

for the purpose of domestic use

under Permit 7489

of the Department of Public Works and that said right to the use of said water has been perfected in accordance with the laws of California, the Rules and Regulations of the Department of Public Works and the terms of the said permit; that the priority of the right herein confirmed dates from May 12, 1947; and that the amount of water to which such right is entitled and hereby confirmed, for the purposes aforesaid, is limited to the amount actually beneficially used for said purposes and shall not exceed two hundred twenty-three thousandths (0.223) cubic foot per second to be diverted from January 1 to December 31 of each year.

The point of diversion of such water is located south two thousand eight hundred (2800) feet and east two thousand two hundred (2200) feet from NW corner of Section 14, T 4 S, R 3 E, HB&M, being within NE $\frac{1}{4}$ of SW $\frac{1}{4}$ of said Section 14.

A description of the lands or the place where such water is put to beneficial use is as follows:

within the community of Redway being within Sections 10, 11, 14 and 15, T 4 S, R 3 E, HB&M.

All rights and privileges under this license including method of diversion, method of use and quantity of water diverted are subject to the continuing authority of the Department acting through the State Engineer in accordance with law and in the interest of the public welfare to prevent waste, unreasonable use, unreasonable method of use or unreasonable method of diversion of said water.

Reports shall be filed promptly by licensee on appropriate forms which will be provided for the purpose from time to time by the State Engineer.

The right hereby confirmed to the diversion and use of water is restricted to the point or points of diversion herein specified and to the lands or place of use herein described.

This license is granted and licensee accepts all rights herein confirmed subject to the following provisions of the Water Code:

Section 1625. Each license shall be in such form and contain such terms as may be prescribed by the Department.

Section 1626. All licenses shall be under the terms and conditions of this division (of the Water Code).

Section 1627. A license shall be effective for such time as the water actually appropriated under it is used for a useful and beneficial purpose in conformity with this division (of the Water Code) but no longer.

Section 1628. Every license shall include the enumeration of conditions therein which in substance shall include all of the provisions of this article and the statement that any appropriator of water to whom a license is issued takes the license subject to the conditions therein expressed.

Section 1629. Every licensee, if he accepts a license does so under the conditions precedent that no value whatsoever in excess of the actual amount paid to the State therefor shall at any time be assigned to or claimed for any license granted or issued under the provisions of this division (of the Water Code), or for any rights granted or acquired under the provisions of this division (of the Water Code), in respect to the regulation by any competent public authority of the services or the price of the services to be rendered by any licensee or by the holder of any rights granted or acquired under the provisions of this division (of the Water Code) or in respect to any valuation for purposes of sale to or purchase, whether through condemnation proceedings or otherwise, by the State or any city, city and county, municipal water district, irrigation district, lighting district, or any political subdivision of the State, of the rights and property of any licensee, or the possessor of any rights granted, issued, or acquired under the provisions of this division (of the Water Code).

Section 1630. At any time after the expiration of twenty years after the granting of a license, the State or any city, city and county, municipal water district, irrigation district, lighting district, or any political subdivision of the State shall have the right to purchase the works and property occupied and used under the license and the works built or constructed for the enjoyment of the rights granted under the license.

Section 1631. In the event that the State, or any city, city and county, municipal water district, irrigation district, lighting district, or political subdivision of the State so desiring to purchase and the owner of the works and property can not agree upon the purchase price, the price shall be determined in such manner as is now or may hereafter be provided by law for determining the value of property taken in eminent domain proceedings.

Witness my hand and the seal of the Department of Public
Works of the State of California, this 17th
day of August, 1953

A. D. EDMONSTON, State Engineer

By Harvey O. Banks
Harvey O. Banks
Assistant State Engineer

10/23/67 RECEIVED NOTICE OF ASSIGNMENT TO Redway Community
Service District

LICENSE 3791

STATE OF CALIFORNIA—DEPARTMENT OF PUBLIC WORKS
DIVISION OF WATER RESOURCES
STATE ENGINEER

LICENSE
TO APPROPRIATE WATER

ISSUED TO Redway Water Co.

DATED

46807 7-51 3M STATE PRINTING OFFICE

STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD
DIVISION OF WATER RIGHTS

ORDER

APPLICATION 23017

PERMIT 15665

LICENSE _____

ORDER APPROVING A NEW DEVELOPMENT SCHEDULE
AND AMENDING THE PERMIT

WHEREAS:

1. A petition for extension of time within which to develop the project and apply the water to the proposed use has been filed with the State Water Resources Control Board.
2. The permittee has proceeded with diligence and good cause has been shown for extension of time.

NOW, THEREFORE, IT IS ORDERED THAT:

1. Paragraph 7 of the permit is amended to read as follows:

CONSTRUCTION WORK SHALL BE
COMPLETED ON OR BEFORE

December 1, 1994

2. Paragraph 8 of the permit is amended to read as follows:

COMPLETE APPLICATION OF THE
WATER TO THE PROPOSED USE
SHALL BE MADE ON OR BEFORE

December 1, 1995

3. Paragraph 10 of this permit is deleted. A new Paragraph 10 is added as follows:

Pursuant to California Water Code Sections 100 and 275, and the common law public trust doctrine, all rights and privileges under this permit and under any license issued pursuant thereto, including method of diversion, method of use, and quantity of water diverted, are subject to the continuing authority of the State Water Resources Control Board in accordance with law and in the interest of the public welfare to protect public trust uses and to prevent waste, unreasonable use, unreasonable method of use, or unreasonable method of diversion of said water.

The continuing authority of the Board may be exercised by imposing specific requirements over and above those contained in this permit with a view to eliminating waste of water and to meeting the reasonable water requirements of permittee without unreasonable draft on the source. Permittee may be required to implement a water conservation plan, features of which may include but not necessarily be limited to: (1) reusing or reclaiming the water allocated; (2) using water reclaimed by another entity instead of all or part of the water allocated; (3) restricting diversions so as to eliminate agricultural tailwater or to reduce return flow; (4) suppressing evaporation losses from water surfaces; (5) controlling phreatophytic growth; and (6) installing, maintaining, and operating efficient water measuring devices to assure compliance with the quantity limitations of this permit and to determine accurately water use as against reasonable water requirements for the authorized project. No action will be taken pursuant to this paragraph unless the Board determines, after notice to affected parties and opportunity for hearing, that such specific

requirements are physically and financially feasible and are appropriate to the particular situation. The continuing authority of the Board also may be exercised by imposing further limitations on the diversion and use of water by the permittee in order to protect public trust uses. No action will be taken pursuant to this paragraph unless the Board determines, after notice to affected parties and opportunity for hearing, that such action is consistent with California Constitution Article X, Section 2; is consistent with the public interest and is necessary to preserve or restore the uses protected by the public trust.

4. Paragraph 12 is added to this permit as follows:

Permittee shall consult with the Division of Water Rights and the Department of Water Resources and develop and implement a water conservation plan or actions. The proposed plan or actions shall be presented to the Board for approval within one year from the date of this order or such further time as may, for good cause shown, be allowed by the Board. A progress report on the development of a water conservation plan may be required by the Board within this period.

Dated: AUGUST 13 1985



Raymond Walsh, Chief
Division of Water Rights

STATE WATER RESOURCES CONTROL BOARD

DIVISION OF WATER RIGHTS

2125 19TH STREET

SACRAMENTO, CALIFORNIA 95818

ORDER APPROVING A NEW DEVELOPMENT SCHEDULE
AND
AMENDING PERMIT

PERMIT 15665

APPLICATION 23017

WHEREAS:

1. A PETITION FOR EXTENSION OF TIME WITHIN WHICH TO DEVELOP THE PROJECT AND APPLY THE WATER TO THE PROPOSED USE HAS BEEN FILED WITH THE STATE WATER RESOURCES CONTROL BOARD.
2. IT APPEARS THAT THE PERMITTEE HAS PROCEEDED WITH DILIGENCE AND THAT GOOD CAUSE HAS BEEN SHOWN FOR EXTENSION OF TIME.
3. THE STATE WATER RESOURCES CONTROL BOARD HAS DULY AUTHORIZED THE CHIEF, DIVISION OF WATER RIGHTS TO SIGN THIS ORDER.

NOW, THEREFORE, IT IS ORDERED THAT:

1. A NEW DEVELOPMENT SCHEDULE BE, AND IS HEREBY, APPROVED AS FOLLOWS:

CONSTRUCTION WORK SHALL BE COMPLETED ON OR BEFORE DECEMBER 1, 1983

APPLICATION OF THE WATER TO THE PROPOSED USE SHALL
BE COMPLETED ON OR BEFORE DECEMBER 1, 1984

2. THE TOTAL ANNUAL DIVERSION AND USE ALLOWED UNDER SAID PERMIT 15665 BE LIMITED TO 441 ACRE-FEET.

3. PARAGRAPH 10 OF THE PERMIT BE AMENDED TO READ AS FOLLOWS: PURSUANT TO WATER CODE SECTION 100, ALL RIGHTS AND PRIVILEGES UNDER THIS PERMIT AND UNDER ANY LICENSE ISSUED PURSUANT THERETO, INCLUDING METHOD OF DIVERSION, METHOD OF USE, AND QUANTITY OF WATER DIVERTED, ARE SUBJECT TO THE CONTINUING AUTHORITY OF THE STATE WATER RESOURCES CONTROL BOARD IN ACCORDANCE WITH LAW AND IN THE INTEREST OF THE PUBLIC WELFARE TO PREVENT WASTE, UNREASONABLE USE, UNREASONABLE METHOD OF USE, OR UNREASONABLE METHOD OF DIVERSION OF SAID WATER.

THIS CONTINUING AUTHORITY OF THE BOARD MAY BE EXERCISED BY IMPOSING SPECIFIC REQUIREMENTS OVER AND ABOVE THOSE CONTAINED IN THIS PERMIT WITH A VIEW TO MINIMIZING WASTE OF WATER AND TO MEETING THE REASONABLE WATER REQUIREMENTS OF PERMITTEE WITHOUT UNREASONABLE DRAFT ON THE SOURCE. PERMITTEE MAY BE REQUIRED TO IMPLEMENT SUCH PROGRAMS AS (1) REUSING OR RECLAIMING THE WATER ALLOCATED; (2) RESTRICTING DIVERSIONS SO AS TO ELIMINATE AGRICULTURAL TAILWATER OR TO

REDUCE RETURN FLOW; (3) SUPPRESSING EVAPORATION LOSSES FROM WATER SURFACES; (4) CONTROLLING PHREATOPHYTIC GROWTH; AND (5) INSTALLING, MAINTAINING, AND OPERATING EFFICIENT WATER MEASURING DEVICES TO ASSURE COMPLIANCE WITH THE QUANTITY LIMITATIONS OF THIS PERMIT AND TO DETERMINE ACCURATELY WATER USE AS AGAINST REASONABLE WATER REQUIREMENTS FOR THE AUTHORIZED PROJECT. NO ACTION WILL BE TAKEN PURSUANT TO THIS PARAGRAPH UNLESS THE BOARD DETERMINES, AFTER NOTICE TO AFFECTED PARTIES AND OPPORTUNITY FOR HEARING, THAT SUCH SPECIFIC REQUIREMENTS ARE PHYSICALLY AND FINANCIALLY FEASIBLE AND ARE APPROPRIATE TO THE PARTICULAR SITUATION.

4. THE QUANTITY OF WATER DIVERTED UNDER THIS PERMIT AND UNDER ANY LICENSE ISSUED PURSUANT THERETO IS SUBJECT TO MODIFICATION BY THE STATE WATER RESOURCES CONTROL BOARD, IF, AFTER NOTICE TO THE PERMITTEE AND AN OPPORTUNITY FOR HEARING, THE BOARD FINDS THAT SUCH MODIFICATION IS NECESSARY TO MEET WATER QUALITY OBJECTIVES IN WATER QUALITY CONTROL PLANS WHICH HAVE BEEN OR HEREAFTER MAY BE ESTABLISHED OR MODIFIED PURSUANT TO DIVISION 7 OF THE WATER CODE. NO ACTION WILL BE TAKEN PURSUANT TO THIS PARAGRAPH UNLESS THE BOARD FINDS THAT (1) ADEQUATE WASTE DISCHARGE REQUIREMENTS HAVE BEEN PRESCRIBED AND ARE IN EFFECT WITH RESPECT TO ALL WASTE DISCHARGES WHICH HAVE ANY SUBSTANTIAL EFFECT UPON WATER QUALITY IN THE AREA INVOLVED, AND (2) THE WATER QUALITY OBJECTIVES CANNOT BE ACHIEVED SOLELY THROUGH THE CONTROL OF WASTE DISCHARGES.

DATED: MAY 2 1975


R. L. ROSENBERGER, CHIEF
DIVISION OF WATER RIGHTS

STATE OF CALIFORNIA
THE RESOURCES AGENCY
STATE WATER RESOURCES CONTROL BOARD
DIVISION OF WATER RIGHTS

PERMIT FOR DIVERSION AND USE OF WATER

PERMIT NO. 15665

Application 23017 of Redway Community Services District

P. O. Box 588, Redway, California

filed on April 5, 1968, has been approved by the State Water Resources Control Board
SUBJECT TO VESTED RIGHTS and to the limitations and conditions of this Permit.

Permittee is hereby authorized to divert and use water as follows:

1. Name of source(s):

Tributary to:

- | | |
|--------------------------|---------------|
| (a) South Fork Eel River | (a) Eel River |
| (b) | (b) |
| (c) | (c) |
| (d) | (d) |
| (e) | (e) |

2. Location of point(s) of diversion:

Bearing and distance or coordinate distances from section corner or quarter-section corner	40-acre subdivision of public land survey or projection thereof	Section	Town- ship	Range	Base and Meridian
S 2,800' and E 2,200' from NW corner (a) of Section 14	NE 1/4 of SW 1/4	14	4S	3E	H
(b)	1/4 of 1/4				
(c)	1/4 of 1/4				
(d)	1/4 of 1/4				
(e)	1/4 of 1/4				

County of Humboldt

3. Place of use: The unincorporated community of Redway in Sections 10, 11, 14 and
15; T4S; R3E; HB&M, as shown on map on file with the State Water Resources Control
Board.

4. Purpose(s) of use: Municipal and domestic

5. The water appropriated shall be limited to the quantity which can be beneficially used, and shall not exceed 1.05 cubic feet per second by direct diversion to be diverted from January 1 to December 31 of each year.

(0000005)

6. The maximum quantity herein stated may be reduced in the license if investigation warrants.

(0000006)

~~Actual construction work shall begin on or before ----- and shall thereafter be prosecuted with reasonable diligence, and if not so commenced and prosecuted this permit may be revoked.~~

7. Said construction work shall be completed on or before December 1, 1971.

(0000008)

8. Complete application of the water to the proposed use shall be made on or before December 1, 1972.

(0000009)

9. Progress reports shall be filed promptly by permittee on forms which will be provided annually by the State Water Resources Control Board until license is issued.

(0000010)

10. All rights and privileges under this permit including method of diversion, method of use and quantity of water diverted are subject to the continuing authority of the State Water Resources Control Board in accordance with law and in the interest of the public welfare to prevent waste, unreasonable use, unreasonable method of use or unreasonable method of diversion of said water.

(0000012)

11. Permittee shall allow representatives of the State Water Resources Control Board and other parties, as may be authorized from time to time by said Board, reasonable access to project works to determine compliance with the terms of this permit.

(0000011)

This permit is issued and permittee takes it subject to the following provisions of the Water Code:

Section 1390. A permit shall be effective for such time as the water actually appropriated under it is used for a useful and beneficial purpose in conformity with this division (of the Water Code), but no longer.

Section 1391. Every permit shall include the enumeration of conditions therein which in substance shall include all of the provisions of this article and the statement that any appropriator of water to whom a permit is issued takes it subject to the conditions therein expressed.

Section 1392. Every permittee, if he accepts a permit, does so under the conditions precedent that no value whatsoever in excess of the actual amount paid to the State therefor shall at any time be assigned to or claimed for any permit granted or issued under the provisions of this division (of the Water Code), or for any rights granted or acquired under the provisions of this division (of the Water Code), in respect to the regulation by any competent public authority of the services or the price of the services to be rendered by any permittee or by the holder of any rights granted or acquired under the provisions of this division (of the Water Code) or in respect to any valuation for purposes of sale to or purchase, whether through condemnation proceedings or otherwise, by the State or any city, city and county, municipal water district, irrigation district, lighting district, or any political subdivision of the State, of the rights and property of any permittee, or the possessor of any rights granted, issued, or acquired under the provisions of this division (of the Water Code).

Dated: JUL 25 1968

STATE WATER RESOURCES CONTROL BOARD

K. L. Woodward
Chief, Division of Water Rights

STATE OF CALIFORNIA
THE RESOURCES AGENCY
STATE WATER RESOURCES CONTROL BOARD
DIVISION OF WATER RIGHTS

ORDER

APPLICATION 23018

PERMIT 15666

LICENSE _____

ORDER APPROVING A NEW DEVELOPMENT SCHEDULE AND AMENDING THE PERMIT

WHEREAS:

1. A petition for extension of time within which to develop the project and apply the water to the proposed use has been filed with the State Water Resources control Board.
2. The permittee has proceeded with diligence and good cause has been shown for extension of time.

NOW, THEREFORE, IT IS ORDERED THAT:

1. A new development schedule is approved as follows:

CONSTRUCTION WORK SHALL BE
COMPLETED ON OR BEFORE

December 1, 1988

COMPLETE APPLICATION OF THE
WATER TO THE PROPOSED USE
SHALL BE MADE ON OR BEFORE

December 1, 1989

2. Paragraph 9 of this permit is deleted. A new Paragraph 9 is added as follows:

Pursuant to California Water Code Sections 100 and 275, all rights and privileges under this permit and under any license issued pursuant thereto, including method of diversion, method of use, and quantity of water diverted, are subject to the continuing authority of the State Water Resources Control Board in accordance with law and in the interest of the public welfare to prevent waste, unreasonable use, unreasonable method of use, or unreasonable method of diversion of said water.

The continuing authority of the Board may be exercised by imposing specific requirements over and above those contained in this permit with a view to minimizing waste of water and to meeting the reasonable water requirements of permittee without unreasonable draft on the source. Permittee may be required to implement such programs as (1) reusing or reclaiming the water allocated; (2) using water reclaimed by another entity instead of all or part of the water allocated; (3) restricting diversions so as to eliminate agricultural tailwater or to reduce return flow; (4) suppressing evaporation losses from water surfaces; (5) controlling phreatophytic growth; and (6) installing, maintaining, and operating efficient water measuring devices to assure compliance with the quantity limitations of this permit and to determine accurately water use as

against reasonable water requirements for the authorized project. No action will be taken pursuant to this paragraph unless the Board determines, after notice to affected parties and opportunity for hearing, that such specific requirements are physically and financially feasible and are appropriate to the particular situation.

3. Paragraph 11 is added to this permit as follows:

The State Water Resources Control Board, under its authority to conserve the public interest, retains continuing authority over this permit to require permittee to develop and implement a water conservation program, after notice and opportunity for hearing. The requirements of this term may be satisfied by permittee's compliance with any comprehensive water conservation program, approved by the State Water Resources Control Board, which may be imposed by a public agency.

Dated: MARCH 31 1981



Walter G. Pettit, Chief
Division of Water Rights

STATE WATER RESOURCES CONTROL BOARD

DIVISION OF WATER RIGHTS

2125 19TH STREET

SACRAMENTO, CALIFORNIA 95818

ORDER APPROVING A NEW DEVELOPMENT SCHEDULE
AND
AMENDING PERMIT

PERMIT 15666

APPLICATION 23018

WHEREAS:

1. A PETITION FOR EXTENSION OF TIME WITHIN WHICH TO DEVELOP THE PROJECT AND APPLY THE WATER TO THE PROPOSED USE HAS BEEN FILED WITH THE STATE WATER RESOURCES CONTROL BOARD.
2. IT APPEARS THAT THE PERMITTEE HAS PROCEEDED WITH DILIGENCE AND THAT GOOD CAUSE HAS BEEN SHOWN FOR EXTENSION OF TIME.
3. THE STATE WATER RESOURCES CONTROL BOARD HAS DULY AUTHORIZED THE CHIEF, DIVISION OF WATER RIGHTS TO SIGN THIS ORDER.

NOW, THEREFORE, IT IS ORDERED THAT:

1. A NEW DEVELOPMENT SCHEDULE BE, AND IS HEREBY, APPROVED AS FOLLOWS:

CONSTRUCTION WORK SHALL BE COMPLETED ON OR BEFORE DECEMBER 1, 1978

APPLICATION OF THE WATER TO THE PROPOSED USE SHALL
BE COMPLETED ON OR BEFORE DECEMBER 1, 1979

2. THE TOTAL ANNUAL DIVERSION AND USE ALLOWED UNDER SAID PERMIT 15666 BE LIMITED TO 52 ACRE-FEET.
3. PARAGRAPH 9 OF THE PERMIT BE AMENDED TO READ AS FOLLOWS: PURSUANT TO WATER CODE SECTION 100, ALL RIGHTS AND PRIVILEGES UNDER THIS PERMIT AND UNDER ANY LICENSE ISSUED PURSUANT THERETO, INCLUDING METHOD OF DIVERSION, METHOD OF USE, AND QUANTITY OF WATER DIVERTED, ARE SUBJECT TO THE CONTINUING AUTHORITY OF THE STATE WATER RESOURCES CONTROL BOARD IN ACCORDANCE WITH LAW AND IN THE INTEREST OF THE PUBLIC WELFARE TO PREVENT WASTE, UNREASONABLE USE, UNREASONABLE METHOD OF USE, OR UNREASONABLE METHOD OF DIVERSION OF SAID WATER.

THIS CONTINUING AUTHORITY OF THE BOARD MAY BE EXERCISED BY IMPOSING SPECIFIC REQUIREMENTS OVER AND ABOVE THOSE CONTAINED IN THIS PERMIT WITH A VIEW TO MINIMIZING WASTE OF WATER AND TO MEETING THE REASONABLE WATER REQUIREMENTS OF PERMITTEE WITHOUT UNREASONABLE DRAFT ON THE SOURCE. PERMITTEE MAY BE REQUIRED TO IMPLEMENT SUCH PROGRAMS AS (1) REUSING OR RECLAIMING THE WATER ALLOCATED; (2) RESTRICTING DIVERSIONS SO AS TO ELIMINATE AGRICULTURAL TAILWATER OR TO

REDUCE RETURN FLOW; (3) SUPPRESSING EVAPORATION LOSSES FROM WATER SURFACES; (4) CONTROLLING PHREATOPHYTIC GROWTH; AND (5) INSTALLING, MAINTAINING, AND OPERATING EFFICIENT WATER MEASURING DEVICES TO ASSURE COMPLIANCE WITH THE QUANTITY LIMITATIONS OF THIS PERMIT AND TO DETERMINE ACCURATELY WATER USE AS AGAINST REASONABLE WATER REQUIREMENTS FOR THE AUTHORIZED PROJECT. NO ACTION WILL BE TAKEN PURSUANT TO THIS PARAGRAPH UNLESS THE BOARD DETERMINES, AFTER NOTICE TO AFFECTED PARTIES AND OPPORTUNITY FOR HEARING, THAT SUCH SPECIFIC REQUIREMENTS ARE PHYSICALLY AND FINANCIALLY FEASIBLE AND ARE APPROPRIATE TO THE PARTICULAR SITUATION.

4. THE QUANTITY OF WATER DIVERTED UNDER THIS PERMIT AND UNDER ANY LICENSE ISSUED PURSUANT THERETO IS SUBJECT TO MODIFICATION BY THE STATE WATER RESOURCES CONTROL BOARD, IF, AFTER NOTICE TO THE PERMITTEE AND AN OPPORTUNITY FOR HEARING, THE BOARD FINDS THAT SUCH MODIFICATION IS NECESSARY TO MEET WATER QUALITY OBJECTIVES IN WATER QUALITY CONTROL PLANS WHICH HAVE BEEN OR HEREAFTER MAY BE ESTABLISHED OR MODIFIED PURSUANT TO DIVISION 7 OF THE WATER CODE. NO ACTION WILL BE TAKEN PURSUANT TO THIS PARAGRAPH UNLESS THE BOARD FINDS THAT (1) ADEQUATE WASTE DISCHARGE REQUIREMENTS HAVE BEEN PRESCRIBED AND ARE IN EFFECT WITH RESPECT TO ALL WASTE DISCHARGES WHICH HAVE ANY SUBSTANTIAL EFFECT UPON WATER QUALITY IN THE AREA INVOLVED, AND (2) THE WATER QUALITY OBJECTIVES CANNOT BE ACHIEVED SOLELY THROUGH THE CONTROL OF WASTE DISCHARGES.

DATED: MAY 2 1975


R. L. ROSENBERGER, CHIEF
DIVISION OF WATER RIGHTS

STATE OF CALIFORNIA
THE RESOURCES AGENCY
STATE WATER RESOURCES CONTROL BOARD
DIVISION OF WATER RIGHTS

PERMIT FOR DIVERSION AND USE OF WATER

PERMIT NO. 15666

Application 23018 of Redway Community Services District
P. O. Box 588, Redway, California

filed on April 5, 1968, has been approved by the State Water Resources Control Board
SUBJECT TO VESTED RIGHTS and to the limitations and conditions of this Permit.

Permittee is hereby authorized to divert and use water as follows:

1. Name of source(s):

Tributary to:

- | | |
|--------------------|---------------------------------|
| (a) Unnamed Spring | (a) South Fork Eel River thence |
| (b) | (b) Eel River |
| (c) | (c) |
| (d) | (d) |
| (e) | (e) |

2. Location of point(s) of diversion:

Bearing and distance or coordinate distances from section corner or quarter-section corner	40-acre subdivision of public land survey or projection thereof	Section	Township	Range	Base and Meridian
N 1,250' and W 50' from SE corner of (a) Section 10	SE 1/4 of SE 1/4	10	4S	3E	H
(b)	1/4 of 1/4				
(c)	1/4 of 1/4				
(d)	1/4 of 1/4				
(e)	1/4 of 1/4				

County of Humboldt

3. Place of use: The unincorporated community of Redway in Sections 10, 11, 14 and 15; T4S, R3E, HB&M, as shown on map on file with the State Water Resources Control Board.

4. Purpose(s) of use: Municipal and domestic

5. The water appropriated shall be limited to the quantity which can be beneficially used, and shall not exceed 0.123 cubic foot per second by direct diversion to be diverted from January 1 to December 31 of each year.

6. The maximum quantity herein stated may be reduced in the license if investigation warrants.

~~Actual construction work shall begin on or before ----- and shall thereafter be prosecuted with reasonable diligence, and if not so commenced and prosecuted this permit may be revoked--~~

~~Said construction work shall be completed on or before--~~

7. Complete application of the water to the proposed use shall be made on or before December 1, 1972.

8. Progress reports shall be filed promptly by permittee on forms which will be provided annually by the State Water Resources Control Board until license is issued.

9. All rights and privileges under this permit including method of diversion, method of use and quantity of water diverted are subject to the continuing authority of the State Water Resources Control Board in accordance with law and in the interest of the public welfare to prevent waste, unreasonable use, unreasonable method of use or unreasonable method of diversion of said water.

10. Permittee shall allow representatives of the State Water Resources Control Board and other parties, as may be authorized from time to time by said Board, reasonable access to project works to determine compliance with the terms of this permit.

This permit is issued and permittee takes it subject to the following provisions of the Water Code:

Section 1390. A permit shall be effective for such time as the water actually appropriated under it is used for a useful and beneficial purpose in conformity with this division (of the Water Code), but no longer.

Section 1391. Every permit shall include the enumeration of conditions therein which in substance shall include all of the provisions of this article and the statement that any appropriator of water to whom a permit is issued takes it subject to the conditions therein expressed.

Section 1392. Every permittee, if he accepts a permit, does so under the conditions precedent that no value whatsoever in excess of the actual amount paid to the State therefor shall at any time be assigned to or claimed for any permit granted or issued under the provisions of this division (of the Water Code), or for any rights granted or acquired under the provisions of this division (of the Water Code), in respect to the regulation by any competent public authority of the services or the price of the services to be rendered by any permittee or by the holder of any rights granted or acquired under the provisions of this division (of the Water Code) or in respect to any valuation for purposes of sale to or purchase, whether through condemnation proceedings or otherwise, by the State or any city, city and county, municipal water district, irrigation district, lighting district, or any political subdivision of the State, of the rights and property of any permittee, or the possessor of any rights granted, issued, or acquired under the provisions of this division (of the Water Code).

Dated: JUL 25 1968

STATE WATER RESOURCES CONTROL BOARD

K. L. Woodward
Chief, Division of Water Rights