Russ Creek and Centerville Slough Restoration Project

Addendum to the 2023 Environmental Impact Report

Humboldt County Resource Conservation District

31 October 2025

→ The Power of Commitment

Addendum to the Environmental Impact Report Russ Creek and Centerville Slough Restoration Project

State Clearinghouse Number: 2022040559

Project Ref#: 11187323

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1. Introduction and Purpose

1.1 Introduction and Project Background

The Final Environmental Impact Report (EIR) for the Russ Creek and Centerville Slough Restoration Project near Ferndale, California (State Clearinghouse Number 2022040559) was certified in August 2023 by the Humboldt County Resource Conservation District (HCRCD). The lead agency is the HCRCD, and the decision-making body is the HCRCD Board of Directors. The purpose of this Addendum is to assess Project changes required by the California Coastal Commission since certification of the Final EIR.

The Project, as analyzed in the EIR, would result in the enhancement of existing tidal wetlands and restoration of marginal diked pasture land to a mosaic of natural habitats, including estuarine and tidal slough channels, freshwater streams, and agricultural pastures, all within the context of promoting the resilience of the Project Area and viability of adjacent agricultural lands outside of the Project Area. The goal of the Project is to improve geomorphic and ecosystem function that would enhance habitats for native fisheries and aquatic species, support water bird and wildlife species, and increase agricultural land viability and resiliency to changing geomorphological and climatic conditions.

The California Coastal Commission Consistency Determination (CD-0004-24) and Coastal Development Permit (CDP 1-17-0328) were concurred and approved, respectively, in August 2025. Special conditions required revisions to site construction plans that would alter the Project description including a modified set-back berm alignment, southern property-Angel's Camp Addition, Cutoff Slough Tide Gate design update, and additional barn/structure removal (Figure 1). These modifications require an expanded Project footprint to the south into APN 100-143-012 and APN 101-102-006 (Figure 2). The proposed Project would be modified (see Section 2) based on these special conditions required by the California Coastal Commission.

1.2 Consistency with CEQA Guidelines Section 15164 (e)

California Environmental Quality Act (CEQA) Guidelines Section 15164 (e) requires a brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 and the lead agency's required findings on the project or elsewhere in the record. The explanation must be supported by substantial evidence. The purpose of this Addendum is to analyze Project changes that do not meet any of the criteria listed for preparation of a subsequent EIR. As demonstrated in Section 3 below, the proposed Project modifications do not meet any of the criteria listed for preparation of a subsequent EIR as identified in Section 15162 of the CEQA Guidelines. This means:

– The modifications would not result in any new significant environmental effects or a substantial increase in severity of previously evaluated significant effects that result from either a substantial change to the Project or changes to the Project circumstances;
– There is no new information of substantial importance since certification of the 2023 EIR that shows the modifications would have new significant effects or more severe than previously evaluated effects; and
– No mitigation measures or alternatives, which were found to be infeasible in the 2023 EIR and are capable of substantially reducing a significant environmental effect, would now be feasible.

Therefore, pursuant to Section 15164 (e) of the CEQA Guidelines, the differences between the approved Project described in the 2023 EIR and modifications currently proposed are considered minor changes and are consistent with the goals, objectives, and types of activities analyzed in the 2023 EIR. Project

modifications do not result in additional, unanalyzed environmental impacts that require additional mitigation not previously considered. Following impact analysis completed in Section 3, the findings prepared for the 2023 EIR remain adequate and unchanged. Therefore, an addendum to the 2023 EIR is the appropriate CEQA compliance documentation to address modifications to the Project.

This Addendum should be read together with the full text of the 2023 Certified Russ Creek and Centerville Slough Restoration Project EIR. Even though modifications to the approved Project are minor, the modifications have been subjected to a detailed analytical process consistent with the methodology and thresholds of significance applied in the 2023 Certified EIR.

1.3 Preparation of an Addendum to the EIR

Under the CEQA (Public Resources Code Section 21000 et. seq., "CEQA") and its implementing Guidelines at California Code of Regulations Title 14, Chapter 3, Section 15164, the preparation of an addendum to an EIR is appropriate when some changes or additions to the EIR are necessary but none of the circumstances enumerated in California Code Regulations Title 14, Chapter 3, Sections 15162 and 15163 exist. Section 15164 states in relevant part:

(a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

Section 15162(a) requires preparation of a subsequent EIR under the following circumstances:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15164 of the CEQA Guidelines states that a lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the

conditions described above in Section 15162(a), calling for preparation of a subsequent EIR, have occurred.

CEQA allows lead and subsequent responsible agencies issuing additional discretionary approvals for a project to restrict their review of modifications to a previously approved project to the incremental effects associated with the proposed project modifications, compared against the anticipated effects of the previously approved project at build-out. In other words, if the project under review constitutes a modification of a previously approved project which was subject to prior final environmental review, the "baseline" for purposes of CEQA is adjusted such that the originally approved project is assumed to exist.

The HCRCD is proposing minor modifications to the approved Project; these changes are described in Section 2 of this Addendum. Some of the resource categories described in Section 2 warrant a more robust discussion about construction or operation impacts or a more robust discussion about a certain project component; therefore, those discussions are provided in Section 3. As demonstrated in detail below, the Project modifications do not meet any of the criteria listed in CEQA Guidelines Section 15162 (preparation of a subsequent EIR). First, the modifications would not result in any new significant environmental effects or a substantial increase in severity of previously evaluated significant effects that result from either a substantial change to the Project or changes to the Project circumstances. Second, there is no new information of substantial importance since certification of the 2023 EIR that shows the modifications would have new significant effects or more severe previously evaluated effects. Therefore, pursuant to Section 15164 of the CEQA Guidelines, the differences between the approved Project described in the 2023 EIR and the added and modified elements of the Project as they are currently proposed are considered minor changes. Furthermore, the 2023 EIR and associated Mitigation Monitoring and Reporting Program remain valid for mitigating the identified significant impacts that would result from implementation of the Project, including the proposed Project modifications. Thus, an addendum to the 2023 EIR is appropriate to address modifications to the Project.

2. Description of Proposed Project Modifications

2.1 Summary

The HCRCD is proposing to modify the 2023 EIR by expanding the Project footprint south and east to accommodate additional tidal wetland restoration to align with requirements established by the California Coastal Commission. The set-back berm would be modified from the 2023 design on the Eel River Estuary Preserve (EREP) and Russ Ranch & Timber (RR&T) properties, and an existing berm would be lowered at Angel's Camp, located at the Project's southern end. One of the six gates proposed for replacement on the Cutoff Slough Tide Gate Structure would include the addition of an auxiliary door that would allow more similar hydrology as existing conditions. The remnants of a third barn/shed structure would also be removed. These Project modifications are consistent with the Project design and function proposed in 2023 and would not result in substantial changes to the overall Project design or function. Additionally, the proposed Project modifications do not lessen or avoid any permit conditions. Project modifications are a requirement of the CD/CDP to ensure Coastal Act consistency and resource protection. According to the California Coastal Commission staff report, the revisions would "significantly expand the habitat restoration area (and modify portions of the set-back berm to a more landward configuration) in order to further benefit the functions of the restored channel and wetlands in consideration of the dynamic shoreline and dune environment."

This Addendum evaluates design modifications and Project component additions to the Project. The Addendum includes a description and graphic of the proposed design modifications (Figure 1), along with information demonstrating how the minor changes remain consistent with the overall Project goals/objectives, the Final Environmental Impact Report (FEIR), Mitigation Monitoring and Reporting Program and Project permits.

2.2 Project Modifications

The following components, which meet the overall Project goals and design objectives consistent with the FEIR, Project permits, Mitigation Monitoring and Reporting Program and funding commitments, are proposed to be added or modified to the previously permitted and approved Project.

2.2.1 Existing Cutoff Slough Tide Gate Repair and Modifications

The existing tidal control structure in Cutoff Slough currently provides the only anthropogenic conduit of drainage from the Project Area and adjacent agricultural areas into the Eel River. The structure is equipped with six top-hinge tide gates that leak and limit aquatic organism passage to/from the Eel River. To increase resiliency of the agricultural lands, minor repairs to the existing structure would be made as part of the Project and include gate replacement and structural retrofits and as described in the 2023 EIR.

In accordance with Project CDP, the six top-hinge gates would be replaced with six "fish-friendly" side-hinge gates, at least one of which shall be equipped with an auxiliary door that can be adaptively set to remain open or closed and managed for low flow fish passage. The auxiliary gates would accommodate the current amount of gate leakage and inboard water quality post-project and would be more conducive to aquatic species passage than current gates. The tide gate design shall be finalized through consultation and cooperation with the National Marine Fisheries Service (NMFS), the U.S. Fish and Wildlife Service (USFWS), and the California Department of Fish and Wildlife (CDFW) pursuant to federal and state Endangered Species Act consultations.

2.2.2 Berm Modifications and Additional Wetland Restoration

Additional areas of wetland restoration would occur via an increased Project Area to the south and east as well as through an update to the set-back berm configuration (Figure 1).

The additional area requires minor modification to the Project components described in the 2023 EIR Section 2.5.4 “Restore and Enhance Tidal Wetlands, Channels and Habitat Ridges” and Section 2.5.5 “New and Reconstructed Set-back Berm.” All components described would occur while additional restoration would occur at these locations:

- Two minor berm realignments would occur within EREP (Figure 1). The northern realignment of the berm to the east would add approximately five acres of existing low-lying area classified as muted tidal wetlands in the 2023 EIR to full tidal wetlands after Project implementation. The southern realignment moves the berm west to exclude approximately five acres of brackish pasture. This area would likely transition to freshwater pasture after Project implementation and therefore resulting in no change in grazable area or productivity per acre relative to the 2023 EIR.
- The set-back berm through RR&T (APNs 100-143-002 and APN 100-143-003) and Linda S Russ Revocable Trust (APN 100-143-004) properties would shift east, allowing 13 additional acres of tidal wetland habitat to be restored. In the 2023 EIR, the 13 acres include both muted tidal wetlands and pasture brackish. This area would be converted to full tidal wetlands after Project implementation.
- Approximately 1,500 linear feet of the existing east-west berm at Angel’s Camp would be lowered and the associated existing culvert would be removed. Portions lowered to a marsh plain elevation would be recontoured to tidal marsh elevations. No marsh plain grading or channel excavation would occur south of the berm, as remnant tidal channels already exist. A new gated culvert would not be installed in the Angel’s Camp berm, as described in the 2023 EIR, because the berm would be removed. The berm removal would allow for an additional 29 acres of tidal wetlands to be reconnected to the south of the 2023 Project Area (APN 100-143-012 and APN 101-102-006).

2.2.3 Raise Centerville Road

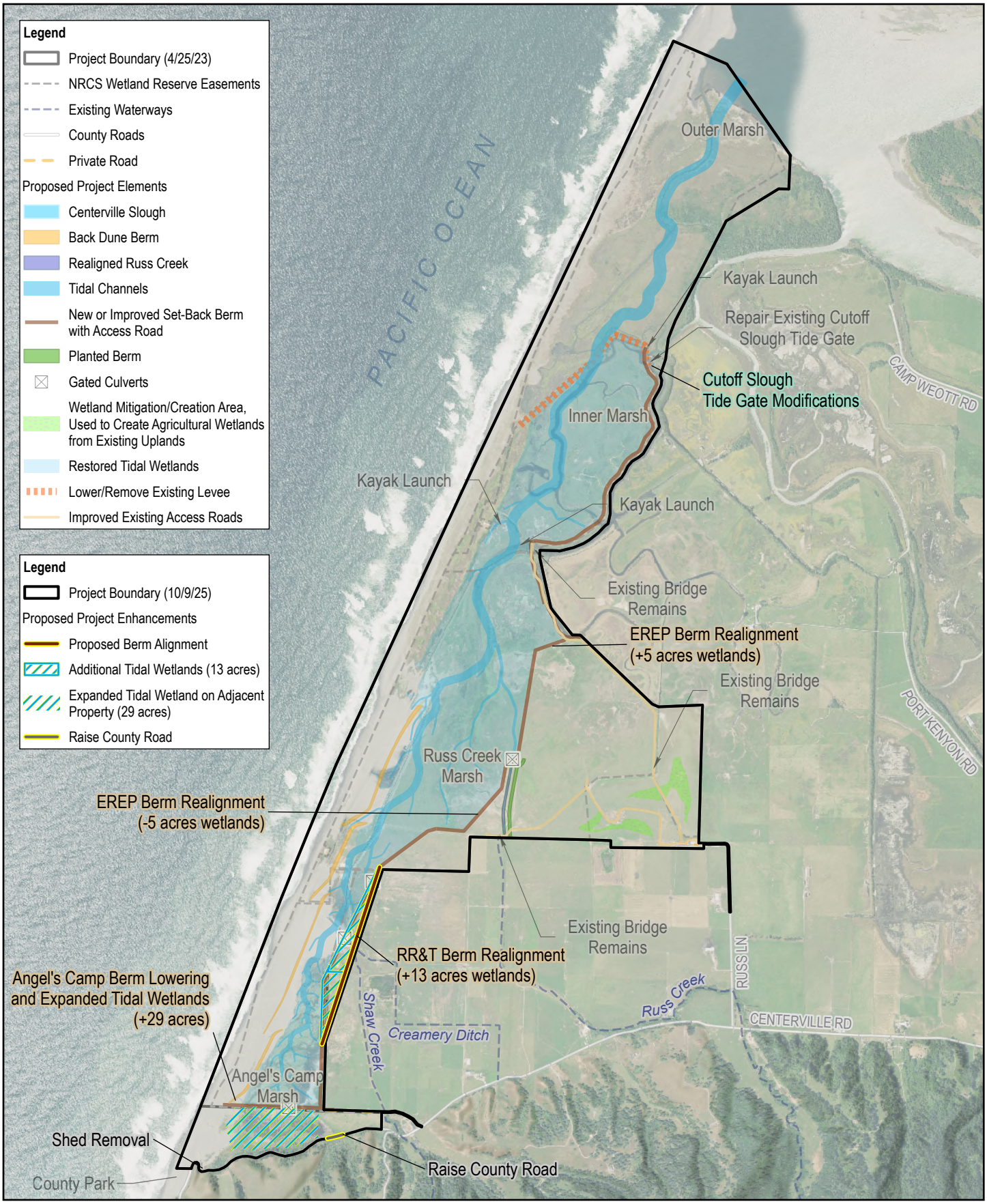
A segment of Centerville Road approximately 700 feet in length along APN 101-102-006 would be raised to 15 feet in elevation to reduce its vulnerability to flooding from the expanded tidal restoration area. The lowest elevation of the existing Centerville Road in this section is nine feet. The elevated section would tie into the existing road elevations (approximately 17-18 feet in elevation) to the east and west.

The road would have similar lane and shoulder widths as existing. Grading to support raising of the road would extend past its current footprint up to approximately 30 feet to the north and up to approximately ten feet to the south to tie into the existing ground elevation. An existing dilapidated 18-inch diameter culvert would be replaced with an up-sized culvert approximately 60 feet long to accommodate drainage from the south of the road to the north. Some roadside vegetation would be cleared during grading and replanted with a native seed mix. No trees would be removed.

2.2.4 Removal of Remnant Shed Debris

As described in the 2023 EIR, the North and South barns would be demolished. Additionally, any above ground remnants of Moranda Garage (called the “Halley” barn/shed in the CDP) on APN 100-143-012 would be removed. No additional ground disturbance would occur. Work is anticipated to be completed in approximately a single day. The County Beach Park parking area would be used for offloading equipment and temporary staging. Low ground pressure tracked equipment operating from the County road shoulder

(i.e., excavator) would remove the debris. As with the North and South barns, material would be hauled off-site for legal disposal.



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Humboldt County Resource Conservation District
Russ Creek and Centerville Slough Restoration Project

Project No. **11187323**
Revision No. **-**
Date **Oct 2025**

Proposed Project Modifications

FIGURE 1

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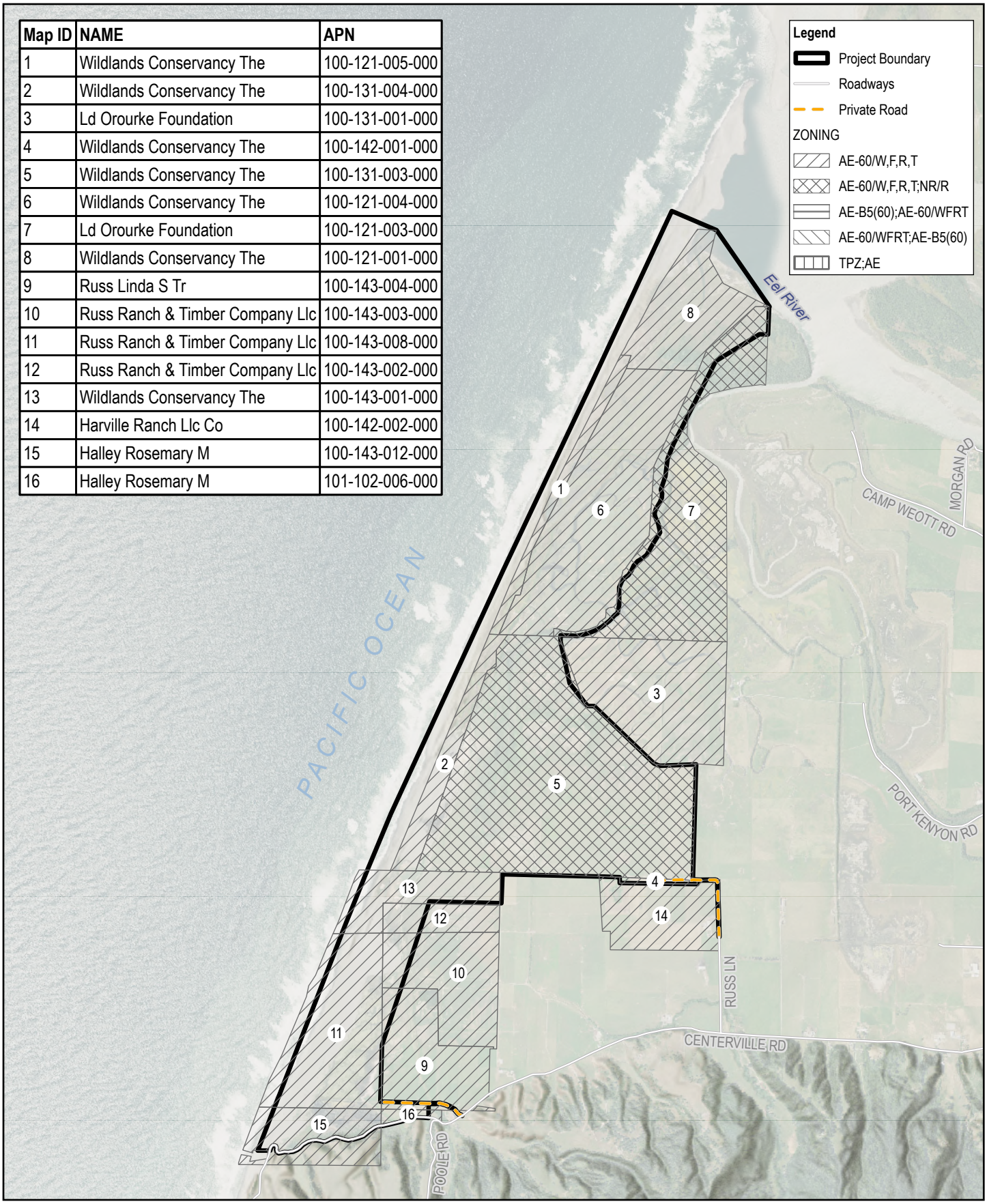
Data source: Project Boundary, GHD 10/9/2025; Humboldt County roads, edited by GHD, 3/11/2021; Humboldt County parcels, 3/3/2022; NAIP 2020; World Hillshade: Esri, NASA, NGA, USGS, FEMA. Created by: jclark2

Map ID	NAME	APN
1	Wildlands Conservancy The	100-121-005-000
2	Wildlands Conservancy The	100-131-004-000
3	Ld Orourke Foundation	100-131-001-000
4	Wildlands Conservancy The	100-142-001-000
5	Wildlands Conservancy The	100-131-003-000
6	Wildlands Conservancy The	100-121-004-000
7	Ld Orourke Foundation	100-121-003-000
8	Wildlands Conservancy The	100-121-001-000
9	Russ Linda S Tr	100-143-004-000
10	Russ Ranch & Timber Company Llc	100-143-003-000
11	Russ Ranch & Timber Company Llc	100-143-008-000
12	Russ Ranch & Timber Company Llc	100-143-002-000
13	Wildlands Conservancy The	100-143-001-000
14	Harville Ranch Llc Co	100-142-002-000
15	Halley Rosemary M	100-143-012-000
16	Halley Rosemary M	101-102-006-000



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Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983
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Humboldt County Resource Conservation District
Russ Creek and Centerville Slough Restoration Project

Project No. **11187323**
Revision No. **-**
Date **Oct 2025**

Ownership and Zoning

FIGURE 2

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Print date: 10 Oct 2025 - 13:08

Data source: Project Boundary, GHD 10/10/2025; Humboldt County roads 3/11/2022, edited by GHD, 12/19/2022; Humboldt County parcels, July 2023; NAIP 2020; World Hillshade: Esri, NASA, NGA, USGS, FEMA. Created by: jclark2

3. Environmental Consequences of Proposed Project Modifications

The purpose of the discussion below is to evaluate potential environmental impacts related to changed circumstances, Project changes, or new information of substantial importance resulting from proposed Project modifications that may result in a different environmental impact significance conclusion than those presented the certified 2023 EIR.

3.1 Aesthetics

The 2023 EIR identified less than significant impacts to scenic vistas and visual quality of public views and no impact to scenic resources and effects on light and glare. The conditions for a scenic vista exist at the Project Area and expanded Project Area. Similar to the Project described in the 2023 EIR, proposed modifications would have similar short-term impacts to these aesthetic and visual resources due to channel, culvert and gated culvert construction and repair, wetland restoration or enhancement, berm improvements, back dune berm construction, removal of non-native vegetation, and expansion of the tidal prism in the marsh complex. Revegetation of habitat either passively or actively would be visually similar to those habitats that currently exist within the Project Area. The raising of Centerville Road would not degrade public views as views available from the public road would remain accessible and the available viewscape would be increased. Therefore, construction would not cause a permanent effect on the aesthetic quality of the area.

There would not be any new significant impacts or substantial changes to the environmental evaluation of aesthetic resources provided in the approved 2023 EIR that would occur with implementation of the proposed Project modifications. The Project modifications evaluated in this Addendum are visually consistent with the Project as proposed in the 2023 EIR and would not generate any new significant impacts related to aesthetics. Therefore, the proposed Project modifications would have no impact or a less than significant impact on aesthetics.

3.2 Agricultural Resources

The 2023 EIR identified less than significant impacts or no impacts for the conversion of Prime Farmland and other agricultural land, conflict with Williamson Act contracts, and changes which could result in the conversion of farmland to non-agricultural use.

Analysis in the 2023 EIR was updated to address two changes: expansion of the Project Area south and berm realignments that alter and ultimately balance the changes to agricultural and non-agricultural uses, specifically tidal and wetland restoration.

Expanded Project Area – Angel's Camp

As described within the 2023 EIR, the soils within the Project Area include those that are considered Prime Farmland if irrigated and drained, and no portions of the Project Area are both irrigated and drained. There is no change in this analysis in the overlapping Project Area. The soils within the expanded Project Area of Angel's Camp include the same soils that are included within the original Project Area (Table 3.2-1). There are no areas within the expanded Project Area that are both irrigated and drained, and the expanded Project Area would contain no Prime Farmland according to the NRCS.

Table 3.2-1 NRCS Soil Units and Prime Farmland Designations Within Expanded Project Area

Soil Unit	Slopes	Irrigated and Drained?	NRCS Prime Farmland Designation
110 – Weott	0-2%	No	Prime Farmland if irrigated and drained
126 – Loleta	2-5%	No	Prime Farmland if irrigated and drained
140 – Occidental	0-2%	No	Not Prime Farmland
155 – Samoa-Clambeach complex	0-50%	No	Not Prime Farmland
232 – Tablebluff-Cannonball-Lepoil complex	15-30%	No	Not Prime Farmland
233 – Cannonball-Candymountain-Lepoil complex	30-50%	No	Not Prime Farmland

There are no Williamson Act contracts within the two new parcels (APN 100-143-012 and APN 101-102-006) in the expanded Project Area. The area includes primarily aquatic, muted tidal wetlands, brackish pasture, and riparian scrub. The majority of the area is not used, and does not have the potential to be used, for agricultural purposes. There are currently only approximately six acres in the expanded Project Area footprint suitable for grazing; these six acres would remain predominantly unchanged and available to grazing despite Project activities (Figure 3 and Figure 4). The lowering of the Angel's Camp berm would not introduce tidal influence on the area suitable for grazing due to the elevation gradient of the area, and productivity would remain roughly equivalent. The proposed Project modifications would have a less than significant impact on agricultural resources in the expanded Angel's Camp Project Area.

Previously Analyzed Project Area

Consistent with the 2023 EIR, although less than the majority of EREP property would be grazed, the productivity per acre on remaining grazing lands of the Project as a whole would nearly double. Parcel productivity is shown in Table 3.2-2, Table 3.2-3, as well as Figure 3 and Figure 4. This increase in productivity is a result of the berm and tidal marsh creation, making them complementary components of agricultural pursuits. Thus, the Project would conform to Humboldt County Williamson Act guidelines.

The acreage of grazing lands within RR&T and Russ properties would not decrease as substantially as EREP grazing lands, and productivity would increase in remaining grazed lands (Table 3.2-2, Table 3.2-3, Figure 3, and Figure 4). The RR&T properties would remain in conformance with Humboldt County Williamson Act guidelines. Therefore, a less than significant impact to agricultural resources and Williamson Act zoning would result from construction and operation of the Project, consistent with findings in the 2023 EIR.

Table 3.2-2 EREP Productivity by Parcel under Existing and Proposed Conditions
(2023 EIR acres shown in parentheses. Differences are attributable to evaluated Project modifications and grading advancements from the previously analyzed 65% design compared to the current final design.)

EREP Property	Existing Conditions			Acreage of Productivity under Existing Conditions							
	Total Acreage	Acres Grazed	Acres Not Grazed	0 lbs/ac	50 lbs/ac	225 lbs/ac	300 lbs/ac	350 lbs/ac	450 lbs/ac	700 lbs/ac	750 lbs/ac
100-121-004 (north)	284	147	138	22		125					
100-131-003 (central)	528	515	13	26	2	312		7	114	3	52
100-143-001 (south)	74	45	29	11 (10)		23					11 (0) *
Subtotal (Existing)	**886**	**707**	**180**	**58 (57)**	**2**	**460**	**0**	**7**	**114**	**3**	**64 (52)**

EREP Property	Proposed Conditions			Acreage of Productivity under Proposed Conditions							
	Total Acreage	Acres Grazed	Acres Not Grazed	0 lbs/ac	50 lbs/ac	225 lbs/ac	300 lbs/ac	350 lbs/ac	450 lbs/ac	700 lbs/ac	750 lbs/ac
100-121-004 (north)	284	0	284								
100-131-003 (central)	528	261 (270)	267 (257)	7 (0)			4 (3)	3	135 (140)	46 (49)	66 (62)
100-143-001 (south)	74	20 (22)	54 (52)	0					0	0	20
Subtotal (Proposed)	**886**	**281 (292)**	**606 (593)**	**7 (0)**	**0**	**0**	**4 (3)**	**3**	**135 (140)**	**47 (49)**	**85 (82)**

*Inadvertent omission in 2023 EIR was corrected but does not change analytical conclusions.

Table 3.2-3 RR&T and Russ Property Productivity by Parcel under Existing and Proposed Conditions
(2023 EIR acres shown in parentheses. Differences are attributable to evaluated Project modifications and grading advancements from the previously analyzed 65% design compared to the current final design.)

RR&T and Russ Property	Existing Conditions			Acreage of Productivity under Existing Conditions							
	Total Acreage	Acres Grazed	Acres Not Grazed	0 lbs/acre	50 lbs/acre	225 lbs/acre	300 lbs/acre	350 lbs/acre	450 lbs/acre	700 lbs/acre	750 lbs/acre
100-143-008	182	156 (146)	25 (35)	113 (114)		23 (22)					0
100-143-003	119	119	0	6		102					11
100-143-004	121	118 (115)	3 (6)	7 (6)		39					73 (69)
101-011-014	7	7	0	0							6
100-142-021	45	45	0	2		1			1		41
100-143-002	40	40	0	4		29					7
100-142-011	70	69	1	0		2			1		66
100-142-008	26	24	2	1		0			0		23
100-142-009	27	25	2	0							25
101-011-016	5	0	5	0							0
101-011-005	44	5	39	0							5
Subtotal (Existing)	**685**	**609 (595)**	**76 (89)**	**154 (134)**	**0**	**194 (196)**	**0**	**0**	**2**	**0**	**256 (252)**

RR&T and Russ Property	Proposed Conditions			Acreage of Productivity under Proposed Conditions							
	Total Acreage	Acres Grazed	Acres Not Grazed	0 lbs/acre	50 lbs/acre	225 lbs/acre	300 lbs/acre	350 lbs/acre	450 lbs/acre	700 lbs/acre	750 lbs/acre
100-143-008	182	12 (15)	170 (166)	10 (14)					1		1 (0)
100-143-003	119	102 (110)	17 (9)	4 (5)					4 (5)	0	95 (100)
100-143-004	121	113 (115)	8 (6)	7					1 (2)	0	105 (106)

101-011-014	7	7	0	0					0		7
100-142-021	45	45	0	3					0		42
100-143-002	40	26 (28)	14 (12)	0 (1)					1		25 (26)
100-142-011	70	69	1	2			0		0	0	67
100-142-008	26	24	2	1							23
100-142-009	27	25	2	0							25
101-011-016	5	0	5	0							0
101-011-005	44	5	39	0							5
Subtotal (Proposed)	**685**	**428 (443)**	**256 (241)**	**28 (33)**	**0**	**0**	**0**	**0**	**7 (9)**	**0**	**394 (401)**

3.3 Air Quality

The 2023 EIR identified potentially significant impacts related to potential conflicts with the implementation of applicable air quality plans, violating air quality standards through the release of particulate matter during construction, and cumulatively considerable contribution to cumulative impacts related to air quality. As indicated in the 2023 EIR, these impacts would be reduced to a less than significant impact with implementation of Mitigation Measure AQ-1 (Dust Control Measures during Construction). The 2023 EIR identified less than significant impacts associated with cumulatively considerable net increase in any criteria pollutant for which the Project region is non-attainment, exposing sensitive receptors to substantial pollutant concentrations, and creating objectionable odors affecting a substantial number of people.

Proposed Project modifications would not result in new or more severe impacts because the modeled Project modifications result in a negligible 0.05% increase in total Project acreage compared to the area where construction and operations would occur described in the 2023 EIR. Table 3.3-1 shows the CalEEMod emissions modeling from the 2023 EIR increased by 0.05%; modeled emissions remain well below significant.

Table 3.3-1 Updated Construction Regional Air Pollutant Emissions (tons per year) for entire Project with Modifications

	ROG	NO_X	PM_{10}	Carbon Monoxide
Construction Emissions 2024	1.05	8.82	3.36	8.085
Construction Emissions 2025	0.945	7.77	3.36	7.875
North Coast Unified Air Quality Management District (NCUAQMD) Stationary Source Thresholds	40	40	15	100
Significant Impact?	**No**	**No**	**No**	**No**

As the construction equipment and duration would remain essentially the same as that evaluated in the 2023 EIR, the Project changes would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Construction and operation of the proposed Project modifications could increase construction-related emissions of fugitive dust (PM_{10} and $PM_{2.5}$) during construction-related earth movement activities. However, Mitigation Measure AQ-1 of the 2023 EIR would require implementation of applicable air quality BMPs and assure compliance with the NCUAQMD rules for particulates. With implementation of Mitigation Measure AQ-1, no new or increased substantial construction-related air quality impacts would result from implementation of the proposed Project modifications evaluated in this Addendum.

The proposed Project modifications would maintain the 2023 EIR conclusion that the Project would have a less than significant impact on air quality with the incorporation of the Mitigation Measures AQ-1.

3.4 Biological Resources

The 2023 EIR identified potentially significant impacts related to long, short, or medium-term impacts to Tidewater Goby, salmonids, breeding or nesting birds, Western Snowy Plover, Northern Red-legged Frog, Western Pond Turtle, special status plants, sensitive communities, and wetlands. These impacts would be reduced to a less than significant impact with implementation of the following mitigation measures:

– BIO-1: Avoidance, Minimization, and Mitigation for Tidewater Goby

- BIO-2: Conduct Pre-construction Avian Surveys for Nesting Passerine Birds and Avian Species of Special Concern
- BIO-3: Avoid, Minimize, and Mitigate for Potential Impacts to Western Snowy Plover
- BIO-4: Mitigate for Potential Impacts to Northern Red-legged Frog and Western Pond Turtle
- BIO-5: Mitigate for Potential Impacts to Salmonid Species
- BIO-6: Mitigate Impacts to Sensitive Listed Plant Species
- BIO-7: Mitigate Impacts to Beach Layia
- BIO-8: Mitigate Impacts to Sensitive Listed Habitats Through Avoidance and Re-establishment
- BIO-9: Mitigate Impacts to Sensitive Listed Habitats Through Control of Invasive Species
- BIO-10: Mitigate Temporary and Short-term Impacts to Wetlands Through Construction Minimization and Avoidance Measures

The 2023 EIR identified less than significant impacts associated with impacts to fish and wildlife movement, local policies or ordinances protecting biological resources, provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plan, and cumulative impacts to biological resources.

The Project modifications would have an expanded footprint of approximately 70 acres, including 29 acres between the Angel's Camp berm and Centerville Road, 700 linear feet along Centerville Road, and 13 acres along the RR&T berm realignment (Figure 1). No marsh plain grading or channel excavation would occur south of the Angel's Camp berm, as remnant channels already exist.

Special status wildlife, SNCs, special status plants, and uplands were assessed within the Project/Study Boundary, with the exception of the 29 acre Angels Camp site, as shown in Appendix C (Summary of Upland and Habitat Mapping) of the 2023 EIR. A supplemental SNC and special status plants survey was conducted within the Angel's Camp expanded Project Area on May 28, 2024, in which no additional special status plants were identified (GHD 2024). Thus, the expanded Project would have no additional impact to special status plants.

Construction of the proposed Project modifications could result in disturbance of breeding or nesting migratory birds. However, disturbance of breeding or nesting migratory birds would be avoided or minimized by implementing Mitigation Measure BIO-2.

As described in the 2023 EIR, the largest concentrations of Western Snowy Plovers regionally are located near the Angel's Camp dune overwash. The expanded Project Area includes critical habitat that includes the entire dune complex from Centerville to the Eel River mouth. Unlike the Project defined in the 2023 EIR, the expanded area at Angel's Camp does not include additional back dune enhancements. However, the proposed expanded tidal marsh would be contained by an existing dune and would not result in long-term changes to designated critical habitat for Western Snowy Plover. The modifications do have the potential to directly and indirectly affect this species through temporary visual and noise disturbance during construction. With the existing Mitigation Measure BIO-3, these impacts would remain less than significant.

Construction of the proposed Project modifications could result in short-term impacts to Northern Red-legged Frog and Western Pond Turtle through mortality related to construction activities. These impacts would be minimized by the implementation of Mitigation Measure BIO-4.

Construction located within and directly adjacent to aquatic channels could result in short-term impacts to Tidewater Goby and Salmonids where fish species could be present or migrating. These impacts to would be minimized by the implementation of Mitigation Measure BIO-1 and BIO-5.

Some habitats in the Project Area are expected to convert as a result of modified Project elements. Table 3.4-1 includes updated habitat acreages based on Project modifications as well as advancements in the design from the previously analyzed 65% design. Brackish marsh, muted tidal wetlands, and part of the brackish pasture are expected to become full tidal wetlands, while part of the brackish pasture would be converted into freshwater pasture (Figure 5 and Figure 6).

Table 3.4-1 Updated Existing Habitats and Proposed Conversions

Habitat Type	Existing Area (acres)	Proposed Area (acres)	Change in Habitat (acres)
Aquatic	102.9	174.1	71.1
Brackish Marsh	106.5	3.2	-103.3
Dune Swales	45.6	53.3	7.7
Dunes	131.0	129.9	-1.1
Full Tidal Wetlands (Mudflat, Salt Marsh, Transition)	164.3	565.7	401.4
Muted Tidal Wetlands (Mudflat, Salt Marsh, Transition)	310.3	10.0	-300.3
Open Sand	181.3	171.3	-10.0
Pasture – Brackish	312.3	14.7	-297.6
Pasture – Freshwater	441.3	673.0	231.6
Pasture – Upland	37.4	22.8	-14.6
Riparian Forest	2.4	6.9	4.5
Riparian Scrub	30.3	28.5	-1.8
Ruderal / Developed	15.5	27.9	12.4
Unmapped	82.3	82.3	-0.1
Total	**1,963.5**	**1,963.5**	-

Approximately 1.8 acres of the riparian scrub habitat in the northeast of the Project Area would be converted into aquatic habitat due to the EREP berm realignment; however, 4.5 acres of riparian forest would be created along both sides of the berm (Figure 6). No net loss of riparian habitat would occur.

Dune mat was the only upland sensitive (S3 ranking) natural vegetation community identified within the Project Area. Restoration activities to create dune swales and address invasive species in the dune habitat would benefit species diversity and sensitive plant communities such as dune mat. No net loss of sensitive natural communities would occur. As described in the 2023 EIR, potential indirect effects to dune mat by construction activities can be mitigated with the implementation of the Mitigation Measure BIO-8 and Mitigation Measure BIO-9 below.

Similar to the 2023 EIR, the modified Project includes both the filling of three-parameter and one-parameter wetlands, as well as the creation of new wetlands (both one and three-parameter wetlands). The United States Army Corps of Engineer (USACE) and North Coast Regional Water Quality Control Board (RWQCB) only require mitigation for the filling of wetlands with three-parameters, while the California Coastal Commission (CCC) also requires mitigation for the filling of one-parameter wetlands. Due to the difference in wetland definitions, two sets of wetland acreages are shown below to evaluate changes to three-parameter and one-parameter wetlands (Table 3.4-2 and Table 3.4-3).

Table 3.4-2 Change in Three-parameter (par) Wetland Areas for the entire Project Area
*(Colors correspond to **Figure 7**)*

Upland Description	Wetland Creation (Acres)	Wetland Fill (Acres)	Remaining Uplands (Acres)	Total (Acres)
Levee Removal Inner Marsh	3.36			3.36
Levee Removal West of New Levee	0.17			0.17
Lone Upland	0.05			0.05
Upland Pasture	14.56		22.80	37.36
1-par Road Removal Inner Marsh*	0.40			0.40
1-par Levee Removal West of New Levee*	0.00			0.00
1-par East of New Levee*			0.15	0.15
1-par Existing Access Road*			1.23	1.23
East of New Levee			1.75	1.75
Existing Access Road			1.07	1.07
Existing Centerville Rd		0.31	0.22	0.53
New Berm		16.37		16.37
Sand Berm		0.89		0.89
Total	**18.54**	**17.57**	**27.23**	**63.34**

*These features are one-parameter wetlands, which would be converted to three-parameter wetlands or remain non-jurisdictional uplands to the RWQCB or USACE.

The portions of Centerville Road within the expanded Project Area were delineated for uplands as part of the Project's 2022 upland delineation (GHD 2022). There were 0.31 acres three-parameter wetlands along Centerville Road that would be converted to upland through the road raising. In 2023 EIR, 18.60 acres of three-parameter wetlands would be created, and 18.56 acres of wetlands would be filled. With the proposed Project modifications and expanded Project Area, the new acreages of three-parameter wetland creation and fill are 18.54 and 17.57, respectively. There will be a net gain of approximately one acre of three-parameter wetlands. The modified Project would result in a no-net loss of three-parameter wetlands. Additionally, the Project would enhance existing low quality wetlands by reestablishing tidal processes, resulting in a substantial ecological lift to three-parameter wetland quality and function across the Project Area. Consistent with the findings of the 2023 EIR, the modified Project would not significantly impact three-parameter wetlands. To the contrary, the Project would result in a substantial benefit to three-parameter wetlands.

Table 3.4-3 Change in Coastal Act Wetland Areas for the entire Project Area *(Colors correspond to* ***Figure 7****)*

Upland Description	Remaining Wetland (Acres)	Wetland Creation (Acres)	Wetland Fill (Acres)	Remaining Uplands (Acres)	Total
Levee Removal Inner Marsh		3.36			3.36
Levee Removal West of New Levee		0.17			0.17
Lone Upland		0.05			0.05
Upland Pasture		14.56		22.80	37.36
1-par East of New Levee	0.15				0.15
1-par Existing Access Road	1.23				1.23
East of New Levee				1.75	1.75
Existing Access Road				1.07	1.07
Existing Centerville Rd			0.31	0.22	0.53
New Berm			16.37		16.37
Sand Berm			0.89		0.89
1-par Existing Centerville Rd			0.02		0.02
New Berm Eastern Edge		0.44			0.44
Upland Pasture Edge		0.41			0.41
Total	**1.38**	**18.99**	**17.58**	**25.84**	**63.80**

Some areas along Centerville Road were also identified as one-parameter wetlands. The 0.02 acres of one-parameter wetland is considered upland within the jurisdiction of the RWQCB but is considered wetland within the jurisdiction of the CCC. The 2023 EIR concluded that 19.01 acres of one-parameter wetlands would be created, and 19.97 acres of wetlands would be balanced via fill. With the proposed Project modifications and expanded Project Area, the new acreages of one-parameter wetland creation and fill are 18.99 and 17.58, respectively. There would thus be a net gain of approximately 1.4 acres of one-parameter wetlands. The modified Project would result in a no-net loss of one-parameter wetlands.

Additionally, the Project would enhance existing low quality wetlands by reestablishing tidal processes, resulting in a substantial ecological lift to one-parameter Coastal Act wetland quality and function across the Project Area. Consistent with the findings of the 2023 EIR, the modified Project would not significantly impact one-parameter wetlands. To the contrary, the Project would result in a substantial benefit to one-parameter wetlands.

As described in the 2023 EIR, the final design and required agency permit applications demonstrate no net loss in wetlands and a numeric accounting of wetland conversion (fill) and establishment. Overall, the Project would result in an increase in tidal wetlands and a reduction in agricultural/grazed wetlands. The change in wetland type is not deemed a significant impact since habitat value would be substantially enhanced through improved tidal prism and associated habitat quality as a result of large-scale, comprehensive restoration actions at the landscape level.

Although no net loss overall to wetland acreage/quantity or quality is expected, the proposed Project could result in short-term temporary impacts to permanent, seasonal, and transitional wetland areas. Through implementation of the existing Mitigation Measure BIO-10, short-term impacts to wetlands and waters would be less than significant.

3.5 Cultural Resources

Prehistoric and historic resources of the Project Area were assessed in multiple cultural resource investigations (Roscoe & Associates 2016, 2022, 2025), which evaluated whether structures within the

Project Area were historic resources. The Area of Potential Effect (APE) included the EREP and RR&T berm realignment areas as well as Centerville Road. The 2023 EIR did not include mitigation measures to protect historical (built) environmental resources. However, the 2023 EIR identified potentially significant impacts associated with the loss of unknown archaeological and historic resources. These impacts would be reduced to a less than significant impact with implementation of Mitigation Measure CR-1: Protocols for Inadvertent Discovery of Cultural Resources, and Mitigation Measure and Mitigation Measure CR-2: Protocols for Inadvertent Discovery of Human Remains.

The Project modifications propose to remove the above ground, visible remnants of the Moranda Garage near Centerville Road in the Angel's Camp area. No marsh contouring or channel excavation would occur in the southern expanded Project Area. The area would be hydrologically connected to the restored Centerville Slough via remnant channels that currently exist in the area. This expanded southern area was not included in past investigations. In October 2025, Roscoe & Associates (R&A) conducted a literature search, Native American outreach, and a field survey for the southern expansion of the Project Area. R&A identified no historic properties or historical resources within the addendum Project Area during their investigation. RA's field survey did identify one collapsed structure, the Moranda Garage. R&A's research indicates that the remnant shed debris to be removed are the remains of a garage constructed to the east of the old livery stable by the Moranda Family in the late 1800s or early 1900s.

Eligibility criteria as delineated by Section 106 and California Register of Historic Resources (CRHR) criteria were applied in the evaluation of the Moranda Garage feature. R&A recommends that the Moranda Garage would not meet any of the criteria to be considered an historical resource eligible for the CRHR or the National Register of Historic Places (NRHP). Additionally, the structure lacks aspects of integrity that would convey any historical significance. Therefore, although the feature would be demolished, the impact would be less than significant.

No new impacts to cultural resources would result from implementation of the proposed Project modifications, and Mitigation Measure CR-1 and Mitigation Measure CR-2 in the event of inadvertent discovery. Therefore, with the implementation of these Mitigation Measures, the modified Project would have a less than significant impact on cultural resources.

3.6 Energy

The 2023 EIR identified less than significant impacts for all resource categories under Energy. The Project would not inefficiently utilize energy due to incorporation of Mitigation Measure AQ-1 which limits idling time and provides measures to protect air quality. The modified Project would not require substantial revisions to the evaluation of energy as defined in the 2023 EIR. The intensity and duration of construction would be largely unchanged. The Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation. Any potential impact related to energy would remain less than significant with the incorporation of Mitigation Measure AQ-1.

3.7 Geology and Soils

The 2023 EIR concluded the Project would have a less than significant impact with mitigation involving strong seismic ground shaking, including on or off-site landslide, lateral spreading, subsidence, liquefaction, collapse, soil erosion, paleontological or geological resources, or otherwise unstable expansive soils. These impacts would be reduced to a less than significant impact with implementation of the following mitigation measures:

– GEO-1: Implement Recommendations in the Geotechnical Report
– GEO-2: Protect Paleontological Resources during Construction Activities
– HWQ-1: Manage Construction Storm Water
– HWQ-2: Implement Contractor Training for Protection of Water Quality
– HWQ-3: In-Stream Erosion and Water Quality Control Measures During Channel Excavation and Operations
– Spartina PEIR WQ-6: Designate Ingress/Egress Routes

The 2023 EIR also concluded a less than significant impact on cumulative impacts related to geology and soil resources and no impact on rupture of a known earthquake fault, septic tanks or alternative wastewater disposal.

The proposed Project modifications would not result in an increase to impacts from a rupture of a known earthquake fault and septic tanks for the same reasons as described in the 2023 EIR.

Project modifications do not require substantial revisions to the evaluation of geology and soils. The Project would adhere to existing Mitigation Measures which would ensure that potential of impacts from strong seismic ground shaking, including on or off-site landslide, lateral spreading, subsidence, liquefaction, collapse, soil erosion, paleontological or geological resources, or otherwise unstable expansive soils would be less than significant. The expanded Project elements are in the same geologic setting, and there are no changes to the risks associated with strong seismic ground shaking, including on or off-site landslide, lateral spreading, subsidence, liquefaction, collapse, soil erosion, paleontological or geological resources, or otherwise unstable expansive soils. The modified Project would have a less than significant impact on geology and soils.

3.8 Greenhouse Gases

The 2023 EIR concluded the Project would have a less than significant impact involving greenhouse gas emissions and no impact on conflict with an applicable regulation and cumulative impacts. The modified Project does not require additional evaluation of greenhouse gas emissions because the intensity and general duration of construction would be unchanged from that evaluated in the 2023 EIR. The expanded Project elements would remain consistent with the applicable plans, policies, and regulations compared to the original Project. The modified Project would not result in new significant environmental effects or a substantial increase in the severity. Any potential impact related to greenhouse gases would remain less than significant.

3.9 Hazards and Hazardous Materials

The 2023 EIR identified potentially significant impacts associated with heavy equipment and herbicide use. This impact would be reduced to a less than significant impact with implementation of Mitigation Measures:

– Spartina PEIR HHM-1: Worker Injury from Accidents Associated with Use of Manual and Mechanical Equipment
– Spartina PEIR HHM-3: Worker Health Effects from Herbicide Application
– Spartina PEIR HHM-4: Avoid Health Effects to the Public and Environment from Herbicide
– HWQ-3: In-Stream Erosion and Water Quality Control Measures During Channel Excavation and Operations

The 2023 EIR identified less than significant impacts related to emergency operation plans, wildland fires, and cumulative impacts, and no impacts related to hazardous emissions, proximity to hazardous materials sites, airport land use plans. Project modifications are consistent with analysis in the 2023 EIR and additional impacts would not result. The expanded Project Area is not located on a site which are included in the DTSC EnviroStor database, GeoTracker database, or any other list pursuant to Government Code § 65962.5. Existing mitigation measures for hazard-related impacts would remain applicable to the minor Project changes.

The modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects for hazards and hazardous materials than previously addressed in the 2023 EIR. Any potential impact related to hazards and hazardous materials would remain less than significant or no impact.

3.10 Hydrology and Water Quality

The 2023 EIR identified potentially significant impacts to water quality standards, erosion, and stormwater drainage systems. This impact would be reduced to a less than significant impact with implementation of Mitigation Measures:

- HWQ-1: Manage Construction Storm Water
- HWQ-2: Implement Contractor Training for Protection of Water Quality
- HWQ-3: In-Stream Erosion and Water Quality Control Measures During Channel Excavation and Operations
- Spartina PEIR WQ-1: Managed Herbicide Control
- Spartina PEIR WQ-2: Minimize Herbicide Spill Risks
- Spartina PEIR WQ-3: Minimize Fuel and Petroleum Spill Risks
- Spartina PEIR WQ-6: Designate Ingress/Egress Routes
- Spartina PEIR WQ-7: Removal of Wrack
- Spartina PEIR HHM-4: Avoid Health Effects to the Public and Environment from Herbicide

The 2023 EIR also identified less than significant impacts to groundwater, flooding, impervious surfaces, release of pollutants from inundation, conflict with a water quality plan, and cumulative impacts. The greatest potential Project impacts to water quality would result from sediment mobilization during channel and wetland, berm, and roadway construction and operations. No additional large-scale targeted invasive plant removal would occur within the expanded Project Area. Two minor berm realignments would occur within EREP. The northern realignment of the berm to the east would add approximately five acres, and the southern realignment moves the berm west to exclude approximately five acres to balance overall. This would be a *de minimis* change from the analyzed 2023 EIR impact related to water quality standards and erosion.

The set-back berm through RR&T and Linda S Russ Revocable Trust properties would shift east, allowing 13 additional acres of tidal wetland habitat to be restored. In the 2023 EIR, the 13 acres include both muted tidal wetlands and brackish pasture. No additional channel grading would occur within the 13 acres, and this area would convert to full tidal wetlands after Project implementation. Additionally, the overall length of set-back berm would be slightly less than described in the 2023 EIR. This would be a *de minimis* change from the analyzed 2023 EIR impact related to water quality standards and erosion.

The existing east-west berm at Angel's Camp would be lowered, with the area of the former berm recontoured to tidal marsh elevations. No marsh plain grading or channel excavation would occur south of

the berm as remnant channels already exist. This would result in a potentially significant impact related to water quality standards and erosion. With the implementation of the existing Mitigation Measures HWQ-1, HWQ-2, and HWQ-3, impacts would be reduced to less than significant.

The addition of an auxiliary door in the Cutoff Slough tide gate, which would be manually actuated would allow the tide gate to be adaptively managed to mimic existing leakage and would result in no additional impacts compared to those analyzed in the 2023 EIR.

Drainage patterns would be altered within the Angel's Camp area through reconnection of existing remnant channels to tidal influence. As described in the 2023 EIR, this portion of the Project Area currently experiences regular wave overwash and prolonged periods of inundation due to impaired drainage. With the implementation of the existing Mitigation Measures HWQ-1, HWQ-2, and HWQ-3, impacts would be reduced to less than significant.

The lowering of the Angel's Camp berm would subject lower sections of Centerville Road to flooding during high tides, high river stage (Eel River), or dune overwash. However, as part of the modified Project, the lower section of Centerville Road with the highest potential of flooding (approximately 700 feet in length) would be raised approximately six feet, which would tie into the existing road elevations to the east and west of the roadway. Elevating the otherwise vulnerable segment of the roadway would reduce the impacts related to flooding to a less than significant threshold.

The Project would not create substantial additional impervious surfaces within the Project Area. The type of grading is consistent with construction techniques described and analyzed in the 2023 EIR. Berm modifications and tidegate replacements would not interact with groundwater resources. Project modifications have been designed to be compatible with hydraulic conditions in the Project Area. Armoring the top of the levee and enhancing drainage would continue to prevent erosion during flood events. A less than significant impact would result.

Following construction, long-term maintenance would be required to ensure the Project functions as designed. Maintenance needs would be primarily limited to the set-back berm and drainage infrastructure (channels, ditches, and tide gates). Operational activities could result in short-term erosion related to ground disturbance (e.g., grading, excavation). Following construction, implementation of the operational Monitoring and Maintenance Plan as described in the 2023 EIR would support annual review of the Project Area for signs of erosion, obstructed channels and ditches, damaged or failed set-back levees and internal access routes, and other unplanned sources of fine sediments that could route to the Eel River and contribute to off-site turbidity. Minor revision to the Monitoring and Maintenance Plan would occur to satisfy CCC requirements. Monitoring would also occur following significant storm events. Operational ground disturbance could result in erosion that could impair the Eel River, north of the Project Area, resulting in a potentially significant off-site impact. With the implementation of the existing Mitigation Measures HWQ-1, HWQ-2, and HWQ-3, operational impacts would be reduced to less than significant.

3.11 Land Use and Planning

The 2023 EIR concluded the Project would have a less than significant impact on conflicting with land use plans or policies and cumulative impacts, and no impact on physically dividing a community. The modified Project would not affect environmental resources related to land use and planning.

As analyzed in the 2023 EIR, the modified Project would convert agricultural land in the expanded Project Area to non-agricultural uses (marsh, wetlands). However, the Project would improve the quality of surrounding agricultural lands by improving drainage and reducing dune overwash and saltwater damage to pasture lands, flooding, and related erosion. Therefore, the Project is consistent with policies relating to

agricultural land preservation. These impacts of the Project on agricultural productivity are addressed in more detail in Section 3.2– Agricultural and Forestry Resources.

Centerville Road would be subject to controlled one-way traffic during the roadway raising. Ingress and egress would be given for emergency first responder access. The lane closures would be temporary and would not physically divide an established community.

The modified Project would not result in new significant environmental effects or a substantial increase in the severity of effects for land use and planning previously addressed in the 2023 EIR. The Project would continue to have a less than or no impact on land use and planning.

3.12 Noise

The 2023 EIR identified less than significant impact on noise levels in excess of standards established in the local general plan or noise ordinance, excessive vibrations, and cumulative impact, and no impact related to airport noise levels.

Because of the distance of sensitive receptors from the expanded Project Area in this sparsely populated, rural area, the construction of the berm modifications would have an inconsequential increase in construction noise compared to what was analyzed in the 2023 EIR. Construction and operation of proposed Project modifications would not result in the exposure of persons off-site or result in generation of noise levels in excess of applicable standards. Any noise or vibration produced by construction equipment associated with the proposed Project modifications would be minor, of short duration, intermittent, and consistent with the 2023 EIR conclusions. The proposed Project modifications would not result in new or more severe noise impacts. Potential impacts related to noise would remain less than significant.

3.13 Public Services

The 2023 EIR identified less than significant impacts for fire and police service, as well as cumulative impacts, and no impacts on schools, parks, or other public facilities. Proposed Project modifications would not increase demand for public services beyond what was analyzed in the 2023 EIR.

The modified Project would not block public service vehicles from accessing the site or result in disruption of response times or other public service standards because fire protection/first response and law enforcement staff would still have access to the site. Site improvements include two vehicle turnaround locations designed to accommodate emergency vehicles. Changes to the proposed Project since the time of prior environmental review would not result in new or more severe impacts to public services.

As discussed in Section 3.13 of the Final EIR, the approved Project would not include any wastewater or water facilities and would not create additional wastewater or water need with the exception of small amounts of water to be trucked to the site for use during construction. The approved Project would generate only a minimal amount of solid waste during construction. Solid waste from construction would be sent to an approved landfill in the disposal area and would not exceed the capacity of local landfills. The proposed Project modifications would not affect utilities or service systems. The Project's impact on public services and utilities would be less than significant.

3.14 Recreation

The 2023 EIR concluded that the Project would have a less than significant impact on parks or other recreational facilities. The Project, as modified, would continue to provide a new recreational features through kayak launches, minor access improvements, and signage. The modified Project would not result in

new significant environmental effects or a substantial increase in the severity of effects for recreation previously addressed in the 2023 EIR. Access to Centerville Beach would continue to remain both during construction and operation as the potential of roadway flooding would be reduced as part of the modified Project. Any potential impact related to recreation would remain less than significant.

3.15 Transportation

The 2023 EIR concluded that the Project would have a less than significant impact on conflicting with a plan or regulation, geometric design hazards, inadequate emergency access, and cumulative impacts related to transportation. Proposed Project modifications would include raising approximately 700 feet of Centerville Road by six feet in elevation. This raised segment would tie into the existing road elevations to the east and west of the roadway with a similar land and shoulder width as the existing alignment. This Project modification would not include elements that constitute an extension of the roadway network.

Temporary controlled one-way traffic of Centerville Road to vehicular traffic would be required for construction for approximately 45 days. Emergency access ingress and egress would not be restricted. The modified Project would not permanently block or impact usage of public roadways, and HCRCD would follow applicable requirements for temporary roadway closures including signage and public noticing.

No operational impact on emergency access would result. The modified Project would not result in new significant environmental effects or a substantial increase in the severity of effects for transportation as previously addressed in the 2023 EIR. Any potential impact related to transportation would remain less than significant impact.

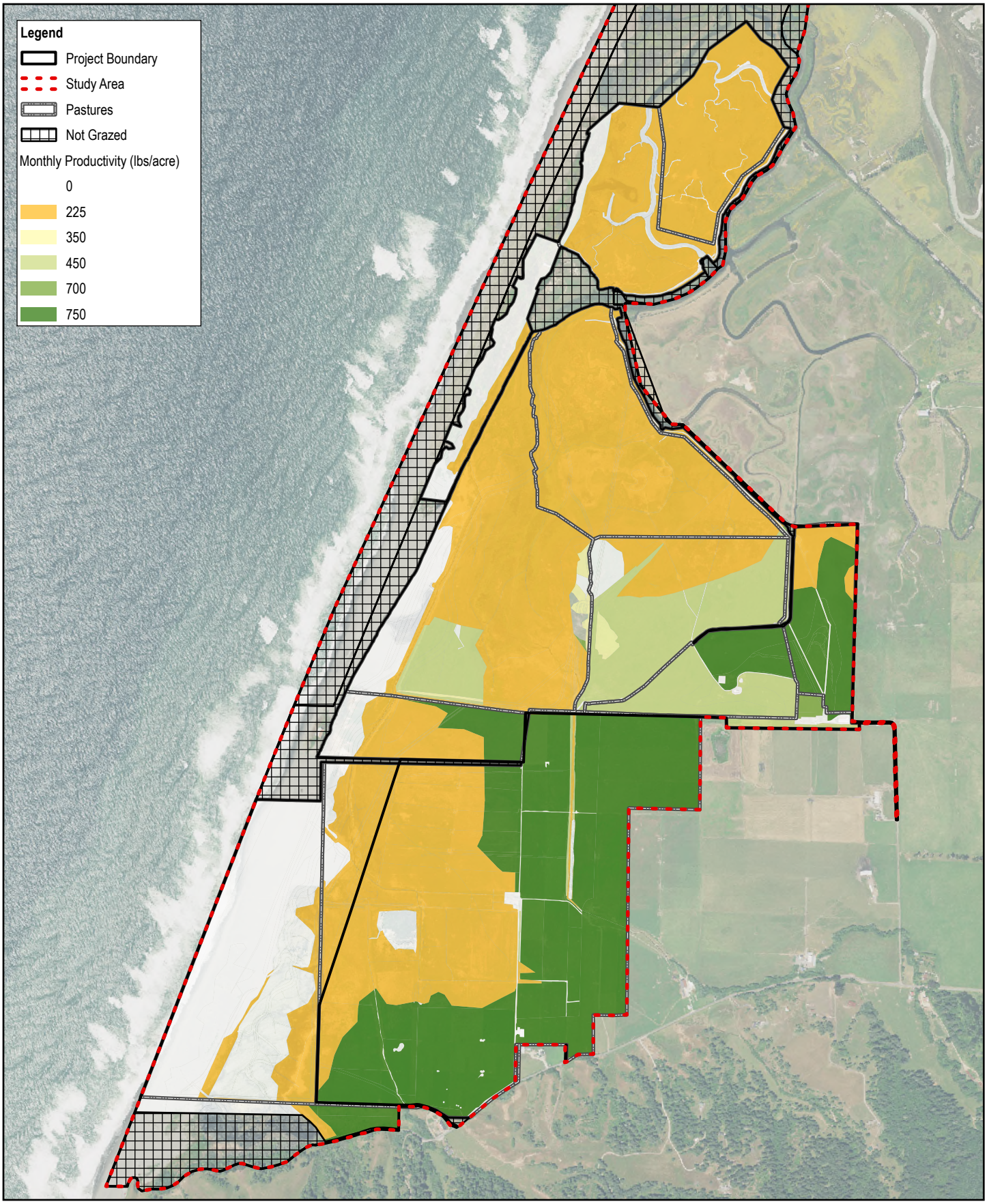
3.16 Tribal Cultural Resources

Prehistoric and historic resources of the Project Area were assessed in a 2016 and 2022 Cultural Resources Investigation, and the expanded Project Area was assessed in 2025, all by R&A. These investigations included a California Historical Resources Information System (CHRIS) Records Search and results from Native American consultation. Tribal consultation under AB52 is not required for this Addendum. No Tribal cultural resources were found in the area of the Project modifications (R&A 2025). Therefore, Project modifications remain consistent with the findings of the 2023 EIR specific to Tribal cultural resources and continue to be less than significant with the incorporation of Mitigation Measure CR-1 and Mitigation Measure CR-2 in the event of inadvertent discovery.

3.17 Wildfire

The 2023 EIR identified less than significant impacts to exacerbate wildfire risks, cumulative impacts, and exposing people or structures to wildfire risks. The 2023 EIR also identified no impact from impacting an emergency response plan and requiring wildfire infrastructure. The modified Project does not include new elements that would increase hazards related to wildfire as defined in the 2023 EIR. The expanded Project Area is similar to the previously analyzed Project Area in terms of wildfire hazard. Thus, there would be no change in wildfire risk related to the overall Project. Any potential impact related to wildfire would remain less than significant or no impact.

3.18 Section 3 Figures



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Humboldt County Resource Conservation District
Russ Creek and Centerville Slough Restoration Project

Project No. **11187323**
Revision No. **-**
Date **Oct 2025**

Existing Productivity of Agricultural Lands

FIGURE 3

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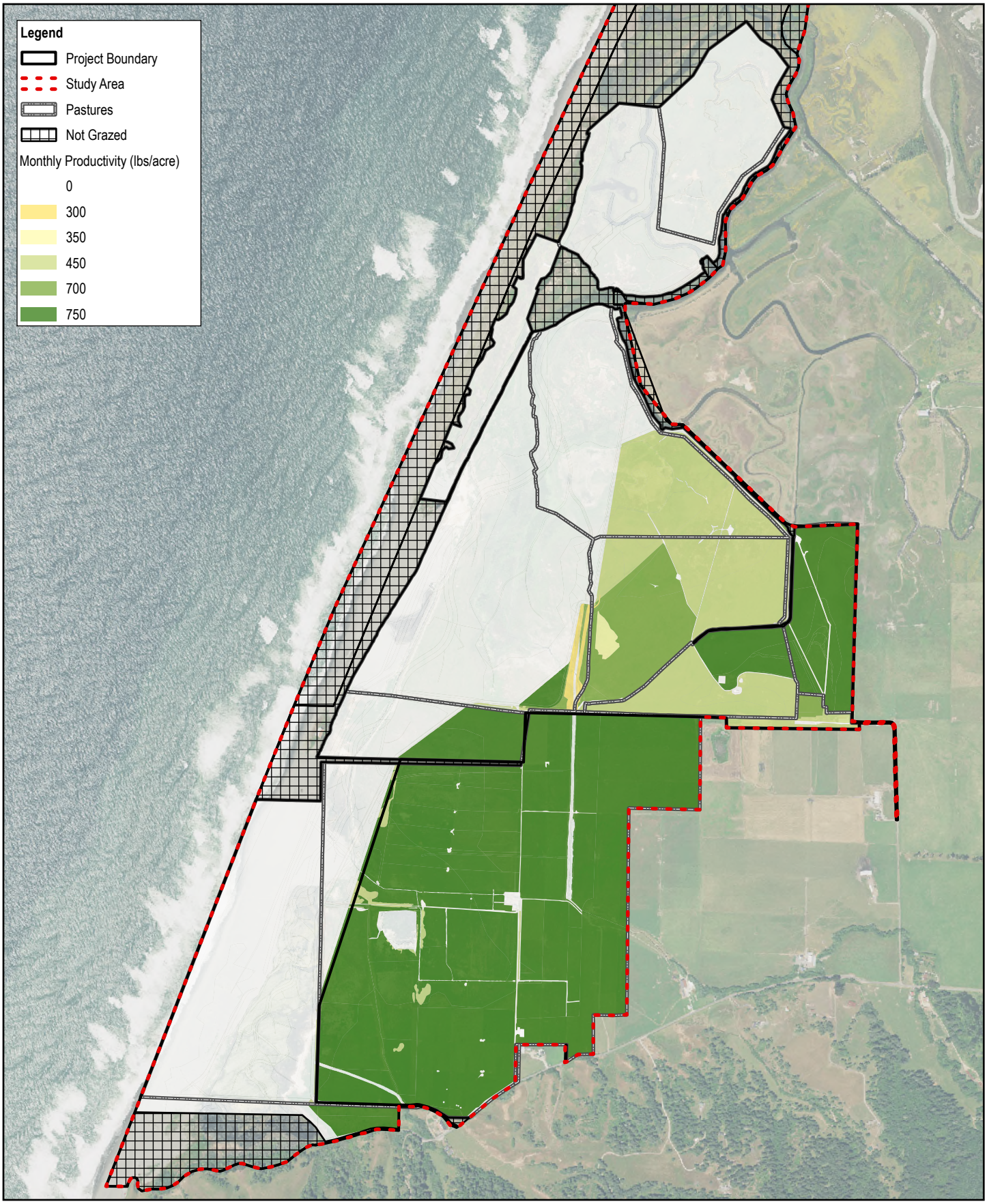

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Humboldt County Resource Conservation District
Russ Creek and Centerville Slough Restoration Project

Project No. **11187323**
Revision No. **-**
Date **Oct 2025**

Proposed Productivity of Agricultural Lands

FIGURE 4

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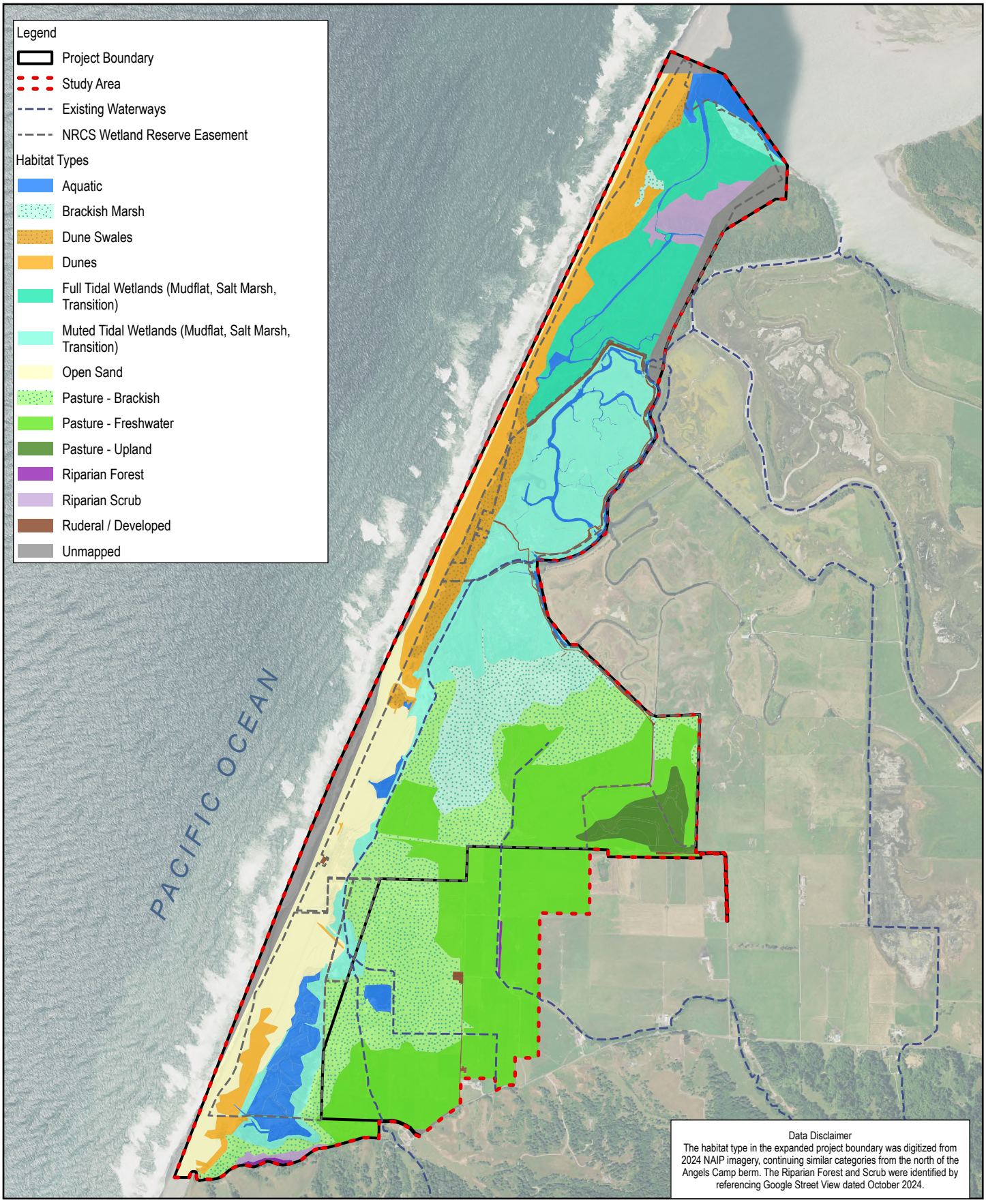

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GHD

Humboldt County Resource Conservation District
Russ Creek and Centerville Slough Restoration Project

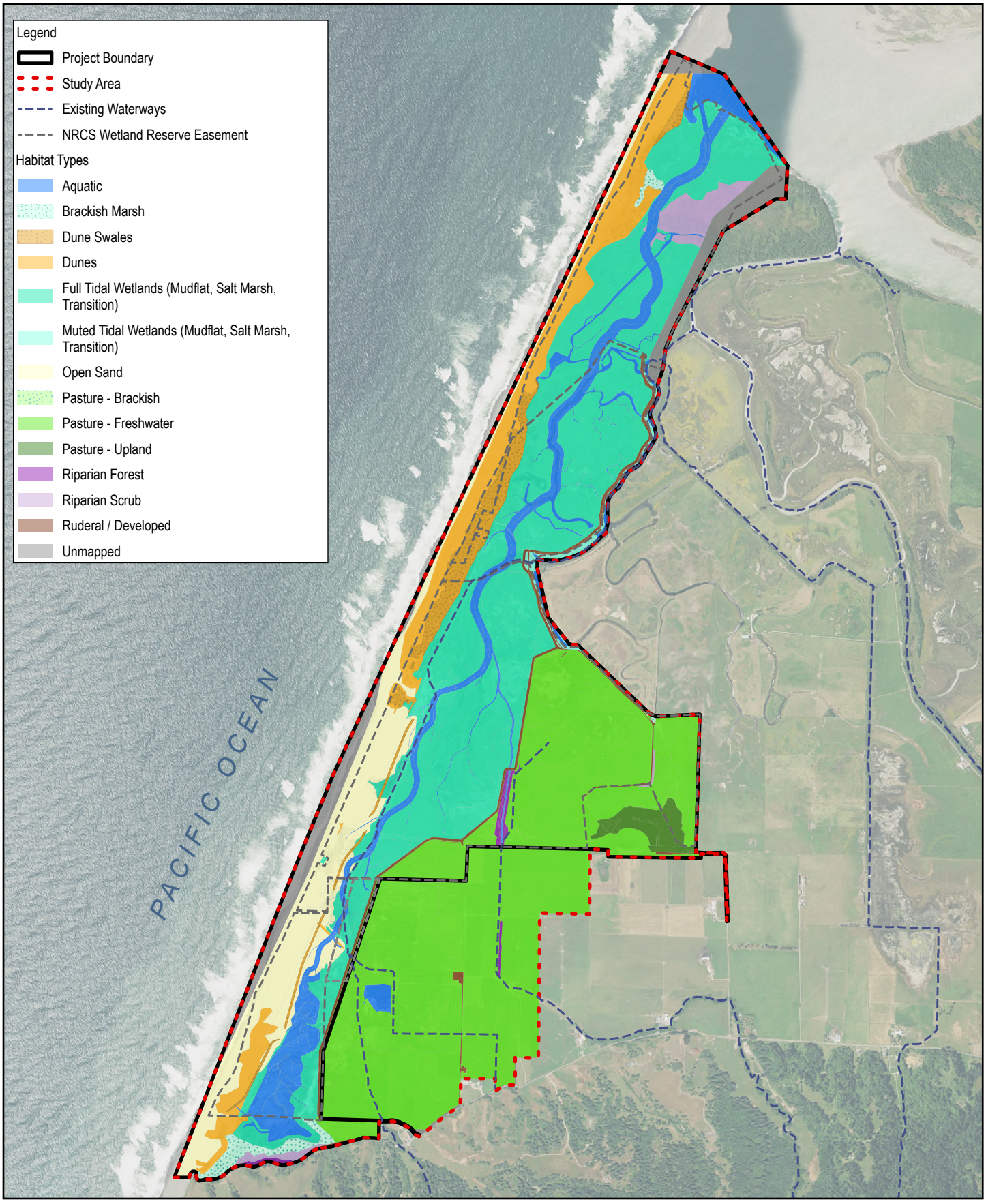
Project No. **11187323**
Revision No. **-**
Date **October 2025**

Existing Habitat Classification Overview

FIGURE 5

N:\US\Azure\EastUS\11187323\08-GIS\Maps\Deliverables\11187323_CEQAAddenda.aprx - 11187323_003_HabitatOverview_Fig5_RevB
Print date: 24 Oct 2025 - 13:32

Data source: GHD Habitat, October 15, 2025; Project boundary, 10/15/2025; Study Area, 10/15/2025; NAIP 2020, . Created by: jclark2



Paper Size ANSI A

0 500 1,000 1,500 2,000 2,500

Feet

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

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GHD

Humboldt County Resource Conservation District
Russ Creek and Centerville Slough Restoration Project

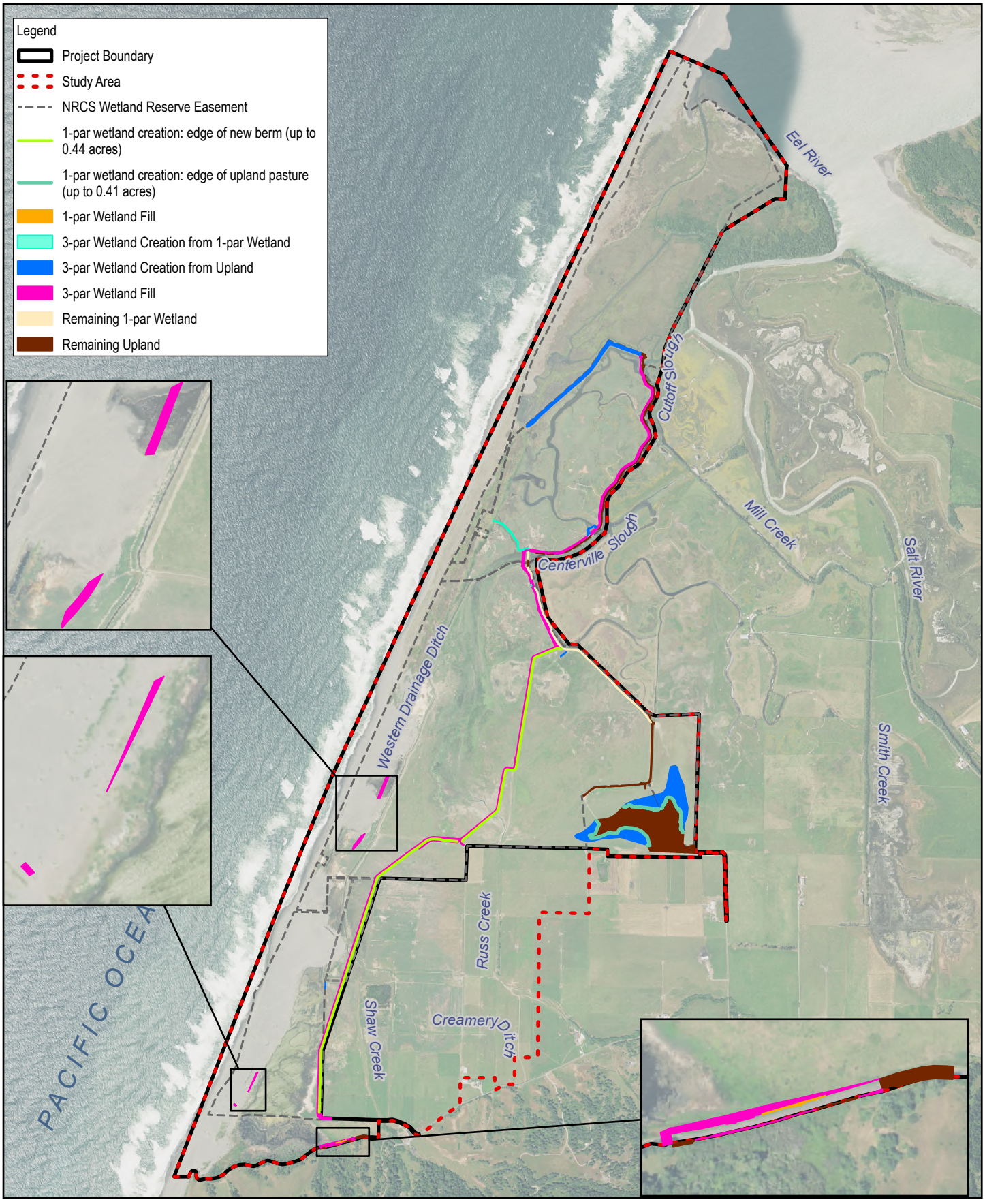
Habitat Classification Under Project Conditions

Project No. **11187323**
Revision No. **-**
Date **October 2025**

FIGURE 6

N:\US\Azure\EastUS\11187323\08-GIS\Maps\Deliverables\11187323_CEQAAddenda.aprx - 11187323_006_ProposedHabitat_Fig6_RevC
Print date: 24 Oct 2025 - 13:35

Data source: GHD Proposed Habitat, Oct 16, 2025; Project boundary, 10/; study area, 10/15/2025; NAIP 2020; . Created by: jclark2



Paper Size ANSI A

0 500 1,000 1,500 2,000 2,500

Feet

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

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GHD

Humboldt County Resource Conservation District
Russ Creek and Centerville Slough Restoration Project

Project No. **11187323**
Revision No. **-**
Date **24 Oct 2025**

Wetland Conversion

FIGURE 7

N:\US\Azure\EastUS\11187323\08-GIS\Maps\Deliverables\11187323_CEQAAddenda.aprx - 11187323_007_WetlandConversion_Fig7_RevB
Print date: 24 Oct 2025 - 15:34

Data source: GHD Uplands, June 13, 2022; Project boundary, 10/15/2025; Study Area, 10/15/2025 NAIP 2020, . Created by: jclark2

4. Alternatives

Project modifications include raising Centerville Road, which was an included feature in Alternative 2 in the 2023 EIR. When the 2023 EIR was prepared and considered for certification, Alternative 2 was not feasible because it would increase fluvial flooding and inundation on a property outside the Project Area. All other resource categories were equivalent to the proposed Project. Since the certification of the 2023 EIR and following CCC review, negotiations have occurred with the landowner and acquisition is now feasible. Project modifications include purposely expanding wetland restoration into the southern parcel at Angel's Camp. Therefore Alternative 2 hydrology impacts are now equivalent to the proposed Project. Alternative 2 and the proposed Project have equivalent environmental impacts. The proposed changes do not require the consideration of new or revised alternatives, because the environmental impacts are not substantially greater than previously reported, and there are no new significant effects.

Otherwise, the remining analyzed alternatives and comparative analysis to evaluate and select an environmentally superior alternative remain unchanged. The modified Project remains the environmentally superior alternative.

5. CEQA Topical Analysis

5.1 Environmental Issues Determined Not to Be Significant

This Section briefly describes the resource categories included in the "Environmental Issues Determined Not to Be Significant" Section of the 2023 EIR. As analyzed in 2023, the Project would have negligible or no impact on Population and Housing, Mineral Resources, and Utilities and Service Systems.

5.1.1 Mineral Resources

As discussed in the 2023 EIR, the proposed Project would not result in the loss of availability of any known mineral resources, including locally identified mineral resource recovery sites. The Project modifications would require relatively small quantities of gravel for raising Centerville Road. Gravel would be imported but would not cause a significant impact to mineral resources. Therefore, the proposed Project modifications are not anticipated to alter the availability of any known mineral resources. As discussed in the 2023 EIR, the Project would have a less than significant impact on mineral resources and the Project modifications do not alter this conclusion.

5.1.2 Population and Housing

As discussed in the 2023 EIR, no elements of the Project would alter population growth. The Project modifications would not extend urban infrastructure into an unserved area; therefore, it would not induce population growth. The proposed Project modifications would not necessitate the construction of replacement housing and would result in no impact related to population and housing.

5.1.3 Utilities and Service Systems

There are no public water, wastewater, natural gas pipeline, or municipal sewer system utilities on site or within the expanded Project Area. A described in the 2023 EIR, solid waste from construction would be legally recycled or disposed of by the contractor at a local waste collection facility, would not increase the usage of existing facilities or require utility facility relocation in or from the Project Area, and would not induce population growth or result in land uses that would increase the demand for upgraded or additional facilities. Therefore, no impact to utilities and service systems would result.

5.2 Growth Inducement

The proposed Project modifications would not have any effect on growth, as the Project would not provide any new housing, infrastructure, or economic activity. Although it would improve drainage on nearby agricultural lands, the Project would not remove any obstacles to growth, expand infrastructure, or develop housing or economic activity. Growth-inducing impacts were found to be less than significant in the 2023 Certified EIR and would remain so for the modifications to the Project being evaluated in this EIR Addendum.

5.3 Significant and Unavoidable Impacts of the Proposed Project

With implementation of mitigation measures, the original 2023 EIR did not identify any unavoidable adverse impacts. Similarly, all potentially significant impacts from the proposed Project modifications are mitigable to a less than significant level with the implementation of mitigation measures identified in the 2023 EIR.

5.4 Significant Irreversible Environmental Changes

The activities proposed with the Project modifications do not significantly differ from the types of activities proposed in the 2023 EIR and would result in fewer, yet similar, irretrievable and irreversible commitment of natural resources through the use of construction materials. This would include the commitment of energy resources to fuel and maintain construction equipment (such as gasoline, diesel and oil) and construction material used during the construction period. Proposed modifications would contribute no additional operational energy consumption or resource use. Therefore, operation of the Project would not result in a significant increase in dependence on non-renewable energy resources or in increases in peak or base-period energy use.

5.5 Cumulative Impacts

No new projects have been identified in addition to the projects listed in the 2023 EIR Table 3-1 (Projects Considered for Cumulative Impacts). The Project modifications would not add to cumulative impacts above or beyond those described in the 2023 EIR.

6. Findings

The proposed Project modifications would not alter any of the conclusions of the 2023 EIR. No new significant environmental effects or a substantial increase in the severity of previously identified significant effects would result. The modifications would not affect any of the mitigation measures, including their feasibility or implementation. As mentioned above, none of the conditions listed in Section 15162 of the CEQA Guidelines exist for the Project modifications described herein. Therefore, pursuant to Section 15164 of the CEQA Guidelines, the differences between the approved Project described in the 2023 EIR and the modifications of the Project as currently proposed and described in this Addendum are minor and this Addendum provides sufficient environmental documentation.

7. References

GHD. 2022. Russ Creek & Centerville Slough Enhancement Project - Sensitive Natural Communities, Rare Plants and Upland Delineation. Prepared for Humboldt County Resource Conservation District.

GHD. 2024. Extended Project Area Rare Plant and Sensitive Natural Communities Assessment. Prepared for Humboldt County Resource Conservation District.

Roscoe & Associates. 2016. A Cultural Resources Investigation for the Connick and Russ Ranches, Eel River Estuary and Centerville Slough Enhancement Project. Humboldt County, California. Prepared for California Trout, June.

Roscoe & Associates. 2022. An addendum to the Cultural Resources Investigation Report for the Connick and Russ Ranches Eel River Estuary and Centerville Slough Enhancement Project. Located in Ferndale, Humboldt County, California. Prepared for GHD, June.

Roscoe & Associates. 2025. Personal communications, Addendum Report in progress.