



MEMORANDUM

DATE: February 10, 2025

To: Dylan LaFrance, PE, JD, Senior Engineer, South Coast Water District

FROM: Pam Reading, Principal Environmental Planner, LSA
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SUBJECT: Class 3 Categorical Exemption for the Proposed Coastal Recycled Water Expansion Project in Dana Point, California

LSA is pleased to submit this memorandum in consideration of a Class 3 Categorical Exemption for the proposed Coastal Recycled Water Expansion Project in Dana Point, California.

PROJECT DESCRIPTION

The South Coast Water District (District) is proposing the Coastal Recycled Water Expansion Project (proposed project), which would include the installation of new recycled water lines and associated infrastructure along segments of Ritz Carlton Drive, Dana Strand Road, and Selva Road in the City of Dana Point. Refer to Figure 1, Project Site, provided as Attachment A.

The proposed project includes the installation of approximately 0.75 mile of 8-inch polyvinyl chloride (PVC) recycled water pipeline that would connect to the existing 8-inch recycled water pipeline in the project vicinity. The proposed project would also include the installation of associated infrastructure including a pressure relief valve (PRV), vault, and a meter pedestal. Specifically, the proposed project includes the installation of 584.06 feet of new recycled water pipeline along Ritz Carlton Drive, 800 feet of new recycled water pipeline along Dana Strand Road, and 2,608.87 feet of new recycled water pipeline along Selva Road. The majority of construction activities would be performed within in the public right-of-way within developed streets, with the exception of the PRV vault, which would be installed within a landscaped area directly outside of the public right-of-way along Selva Road. The proposed pipelines would be installed at a depth of 4 to 6 feet below the ground surface (bgs) and would require a maximum depth of 6 to 8 feet of excavation bgs. Installation of the proposed PRV and vault would require a maximum depth of 10 feet of excavation bgs. Construction activities associated with the proposed project would result in a total disturbed area of 14,800 square feet. All excavation and land disturbance activities would occur within land that has been previously disturbed to construct existing underground utility lines, roadways, and landscaped area. Following completion of project construction, the affected roadway segments would be repaved and restriped.

Land uses in the vicinity of the project site include residential uses, transportation corridors, recreational uses, and commercial uses. The project site primarily consists of public right-of-way and does not have an assigned zoning or land use designation. Surrounding areas are zoned as

Residential Single Family 4, 7, and 12 (RSF 4, RSF 7, and RSF 12), Residential Multiple Family 22 (RMF 22), Professional/Administrative (P/A), Community Facilities (CF), Visitor/Recreation Commercial (V/RC), Recreation District (REC), and Specific Plan: Headlands Conservation & Development Plan in the City of Dana Point Zoning Code. Surrounding areas are designated as Residential 0-3.5 DU/ac (RES 0-3.5), Residential 3.5-7 DU/ac (RES 3.5-7), Residential 7-14 DU/ac (RES 7-14), Residential 14-22 DU/ac (RES 14-22), Residential 22-30 DU/ac (RES 22-30), Community Facility (CF), Recreation/Open Space (R/OS), and Visitor/Recreation Commercial (V/RC) in the City of Dana Point General Plan. The entire project site is located within the Coastal Zone Boundary. Additionally, the majority of the project site, including the proposed segments of recycled water line along Ritz Carlton Drive, Dana Strand Road, and Selva Road west of State Route 1 (SR-1), are located within the Appeal Jurisdiction of the California Coastal Zone.

CALIFORNIA ENVIRONMENTAL QUALITY ACT, SECTION 15303, CLASS 3 EXISTING FACILITIES EXEMPTION

Article 19 of the *State California Environmental Quality Act (CEQA) Guidelines* includes, as required by Public Resources Code (PRC) Section 21084, a list of classes of projects that have been determined not to have a significant effect on the environment and, as a result, are exempt from review under CEQA. This document has been prepared to serve as the basis for compliance with CEQA as it pertains to the proposed project, and to demonstrate that the project would be exempt from environmental review pursuant to Section 15303(d) of the CEQA Guidelines (Class 3, New Construction or Conversion of Small Structures), consistent with the provisions of *State CEQA Guidelines* Sections 15303 and 15300.2. Specifically, the information provided herein shows the following:

- a. The project qualifies for an exemption under *State CEQA Guidelines* Sections 15303 (i.e., Class 3) and, as a result, would not have a significant effect on the environment.
- b. The analysis shows there are no exceptions to qualifying for the exemption, as identified in *State CEQA Guidelines* Section 15300.2.

Under *State CEQA Guidelines* Section 15303, a Class 3 exemption is applicable to projects that consist of construction of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The proposed project would closely align with *State CEQA Guidelines* Section 15303(d):

(d) Water main, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction.

The proposed project includes the installation of approximately 0.75 mile of 8-inch PVC recycled water pipeline that would connect to the existing 8-inch recycled water pipeline in the project vicinity. The proposed project would also include the installation of associated infrastructure including a PRV, vault, and a meter pedestal. Following completion of project construction, the affected roadways would be repaved and restriped. All excavation and land disturbance activities

would occur within land that has been previously disturbed to construct the existing underground utility lines, roadways, and landscaped area. The proposed project would have the same purpose and function typically characterized by the District's existing utility infrastructure.

As the proposed project properly qualifies for an exemption under *State CEQA Guidelines* Section 15303 (i.e., Class 3), the proposed project would not have a significant effect on the environment. Additionally, the following analysis shows there are no exceptions to qualifying for the CE, as identified in *State CEQA Guidelines* Section 15300.2.

CALIFORNIA ENVIRONMENTAL QUALITY ACT CATEGORICAL EXEMPTIONS – EXCEPTIONS

In addition to investigating the applicability of *State CEQA Guidelines* Section 15303 (Class 3) for the proposed project, this memorandum assesses whether any of the exceptions to qualifying for the CE are present. The following analysis compares the criteria of *State CEQA Guidelines* Section 15300.2 (Exceptions) to the proposed project. As described in the analysis below, LSA has determined that none of the exceptions are applicable to the proposed project.

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

As shown in Figure 1, the project site is located within and immediately adjacent to the public right-of-way which consists of segments of developed streets including Ritz Carlton Drive, Dana Strand Road, and Selva Road. All three roadways are located in an urbanized area within the City of Dana Point. There are no structures present in any portion of the project site. The proposed PRV and vault would be installed immediately adjacent to the public right-of-way along Selva Road and would require the removal of minimal ornamental vegetation that is maintained by the adjacent Homeowner's Association (HOA). However, special-status species are not expected to occur on the project site because no suitable habitat is present within the project site. Construction of the proposed project would not require the removal of any trees, and therefore, would not result in impacts to nesting birds. In addition, the proposed project would not result in any impacts to an environmental resource of hazardous or critical concern. Therefore, the exception under *State CEQA Guidelines* Section 15300.2(a) does not apply to the proposed project.

- (b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place over time is significant.**

The proposed project includes the installation of approximately 0.75 mile of 8-inch PVC recycled water pipeline that would connect to the existing 8-inch recycled water pipeline in the project vicinity. The proposed project would also include the installation of associated infrastructure including a PRV and vault and a meter pedestal. Following completion of project construction,

the affected roadway segments would be repaved and restriped. All excavation and land disturbance activities would occur within land that has been previously disturbed by construction of the existing roadways or adjacent development.

The proposed project would not, in and of itself, result in significant impacts. Additionally, no permanent or long-term effects, such as loss of wetlands or other sensitive natural communities, take of special-status species, increased vehicle trips, or creation of stationary sources of air and noise emissions, would occur as part of the proposed project. The proposed project would also not result in any long-term or growth-inducing impacts. Furthermore, there are no current or reasonably foreseeable projects similar in nature that are proposed in the project area; therefore, there are no project impacts that would be cumulatively considerable in connection with the effects of past projects, the effects of other current projects, or the effects of probable future projects.

Therefore, the proposed project's contributions to potential cumulative impacts would not be cumulatively considerable, and the exception under *State CEQA Guidelines* Section 15300.2(b) does not apply to the proposed project.

- (c) **Significant Effect**. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

No unusual circumstances have been identified in or around the project site that would result in significant environmental impacts. The proposed project includes the installation of approximately 0.75 mile of 8-inch PVC recycled water pipeline that would connect to the existing 8-inch recycled water pipeline in the project vicinity. The proposed project would also include the installation of associated infrastructure including a PRV and vault and a meter pedestal. The proposed project may require temporary lane closures during construction; however, detours and appropriate signage would be provided to avoid any potential environmental effects. Following completion of project construction, the affected roadway segments would be repaved and restriped. All excavation and land disturbance activities would occur within land that has been previously disturbed by construction of the existing roadways or adjacent development. No work would occur outside of the project limits. No amendments to an adopted planning document would be required for implementation of the proposed project. Given that the project site has been previously disturbed, and the surrounding areas can be characterized as urban and developed, the proposed project would not have a significant effect on the environment due to unusual circumstances. Therefore, the exception under *State CEQA Guidelines* Section 15300.2(c) does not apply to the proposed project.

- (d) **Scenic Highways**. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified Environmental Impact Report.

The proposed project includes the installation of approximately 0.75 mile of 8-inch PVC recycled water pipeline that would connect to the existing 8-inch recycled water pipeline in the project vicinity. The proposed project would also include the installation of associated infrastructure including a PRV and vault and a meter pedestal. Following completion of project construction, the affected roadway segments would be repaved and restriped. Some portions of the project site are located within and immediately adjacent to State Route 1 (SR-1), which is an eligible State Scenic Highway,¹ and are visible from motorists traveling along the highway. However, there are no scenic resources such as trees, historic buildings, rock outcroppings, or similar resources within the project footprint that would be damaged as a result of the proposed project. Additionally, the proposed project would not include any improvements that extend above the road surface that would be visible to the public traveling along SR-1.

Construction activities would include site preparation, equipment use and storage, and other general construction activity, which would be visible from some portions of SR-1. Construction activities and the presence of construction vehicles and equipment could temporarily degrade the visual quality of the project site. However, the change of visual character at the project site during construction activities would be temporary in nature and would be returned to pre-construction conditions after completion of the proposed project. Therefore, the proposed project would not result in damage to existing scenic resources. Accordingly, the exception under State CEQA Guidelines Section 15300.2(d) does not apply to the proposed project.

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

The project site is not included on the California Department of Toxic Substances Control's Hazardous Waste and Substances Site List or any lists compiled pursuant to Section 65962.5 of the Government Code.² Therefore, no impacts associated with locating a project on a site included on a list of hazardous materials would occur, and the exception under *State CEQA Guidelines* Section 15300.2(e) does not apply to the proposed project.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

The proposed project includes the installation of approximately 0.75 mile of 8-inch PVC recycled water pipeline that would connect to the existing 8-inch recycled water pipeline in the project vicinity. The proposed project would also include the installation of associated infrastructure including a PRV and vault and a meter pedestal. Following completion of project construction, the affected roadway segments would be repaved and restriped. The project site is fully developed and has previously undergone substantial surficial and subsurface disturbance. The

¹ California Department of Transportation (Caltrans). 2018. *California State Scenic Highway System Map*. Website: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca> (accessed January 28, 2025).

² California Environmental Protection Agency. 2025. *Cortese List Data Resources*. Website: <https://calepa.ca.gov/sitecleanup/corteselist/> (accessed January 28, 2025).

areas immediately surrounding the project site are also primarily fully developed. All excavation and land disturbance activities would occur within sediments that have been previously disturbed during construction the existing utility lines, roadways, and landscaped area. Because of this previous disturbance, there is limited potential for project-related ground disturbance to encounter pre-contact or historic-period archaeological deposits or artifacts in their original context. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource. As such, *State CEQA Guidelines* Section 15300.2(f) does not apply to the proposed project.

CONCLUSION

In summary, the proposed project would not result in any specific or general exceptions to the use of a Categorical Exemption as detailed under *State CEQA Guidelines* Section 15303. No potential cumulative impacts or unusual circumstances would occur that may reasonably create an environmental impact. The project site does not have value as habitat for endangered, rare, or threatened species. The proposed project would not result in damage to a scenic resource within a highway designated as a State Scenic Highway. Further, the project site is not on any list compiled pursuant to Section 65962.5 of the Government Code. Additionally, the proposed project would not cause a substantial adverse change in the significance of a historical resource. Therefore, the proposed project is exempt from the provisions of CEQA as specified by the *State CEQA Guidelines* identified above.

Attachments: A: Figure 1

ATTACHMENT A

FIGURE 1



 Project Site

FIGURE 1

LSA



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FEET

SOURCE: Google Streets (2024); Google Imagery (2024)

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Coastal Recycled Water Expansion Project
Project Location