



Geotechnical Borings for Water Storage Reservoirs Project

Categorical Exemption Report

prepared by

City of Fort Bragg Public Works Department
416 North Franklin Street
Fort Bragg, California 95437
Contact: Diane O'Connor, Assistant City Engineer

prepared with the assistance of

Rincon Consultants, Inc.
4825 J Street, Suite 200
Sacramento, California 95819

July 2025



RINCON CONSULTANTS, INC. SINCE 1994

Table of Contents

1	Introduction	1
2	Project Location and Description.....	2
2.1	Project Location	2
2.2	Project Description.....	5
3	Class 6 CE Consistency Analysis	6
3.1	Class 6 CE Applicability.....	6
3.2	Exceptions to CE Applicability	6
4	Summary.....	9
5	References	10

Figures

Figure 1	Regional Project Location.....	3
Figure 2	Project Site Location.....	4

1 Introduction

This report serves as the technical documentation of an environmental analysis performed by Rincon Consultants, Inc. for the Geotechnical Borings for Water Storage Reservoirs Project (project) in Fort Bragg, California. The intent of the analysis is to document whether the project is eligible for a Class 6 Categorical Exemption (CE). The report provides an introduction, project description, and evaluation of the project's consistency with the requirements for a Class 6 CE. The report concludes that the project is eligible for a Class 6 CE.

The City of Fort Bragg proposes to adopt a Class 6 CE for the project, which is located immediately southeast of Summers Lane Reservoir, in Fort Bragg, Mendocino County. The CEQA Guidelines Section 15306 states that a CE is allowed when a project consists of basic data collection, research, experimental management, and resource valuation activities which do not result in a serious or major disturbance to an environmental resource. These may be for strictly informational gathering purposes, or as part of a study leading to an action which a public agency has not yet approved, adopted, or funded.

Additionally, CEQA Guidelines Section 15300.2 outlines the cases in which projects that would normally be exempt from CEQA review would not be exempt. For a Class 6 CE, these exceptions are as follows:

- 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 all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
- b) **Cumulative Impact.** All 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.
- 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.
- 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 EIR.
- 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.
- 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.

Rincon Consultants, Inc. evaluated the project's consistency with the above requirements, as well as the applicability of the exceptions to use of a Class 6 CE to confirm the project's eligibility for the Class 6 CE.

2 Project Location and Description

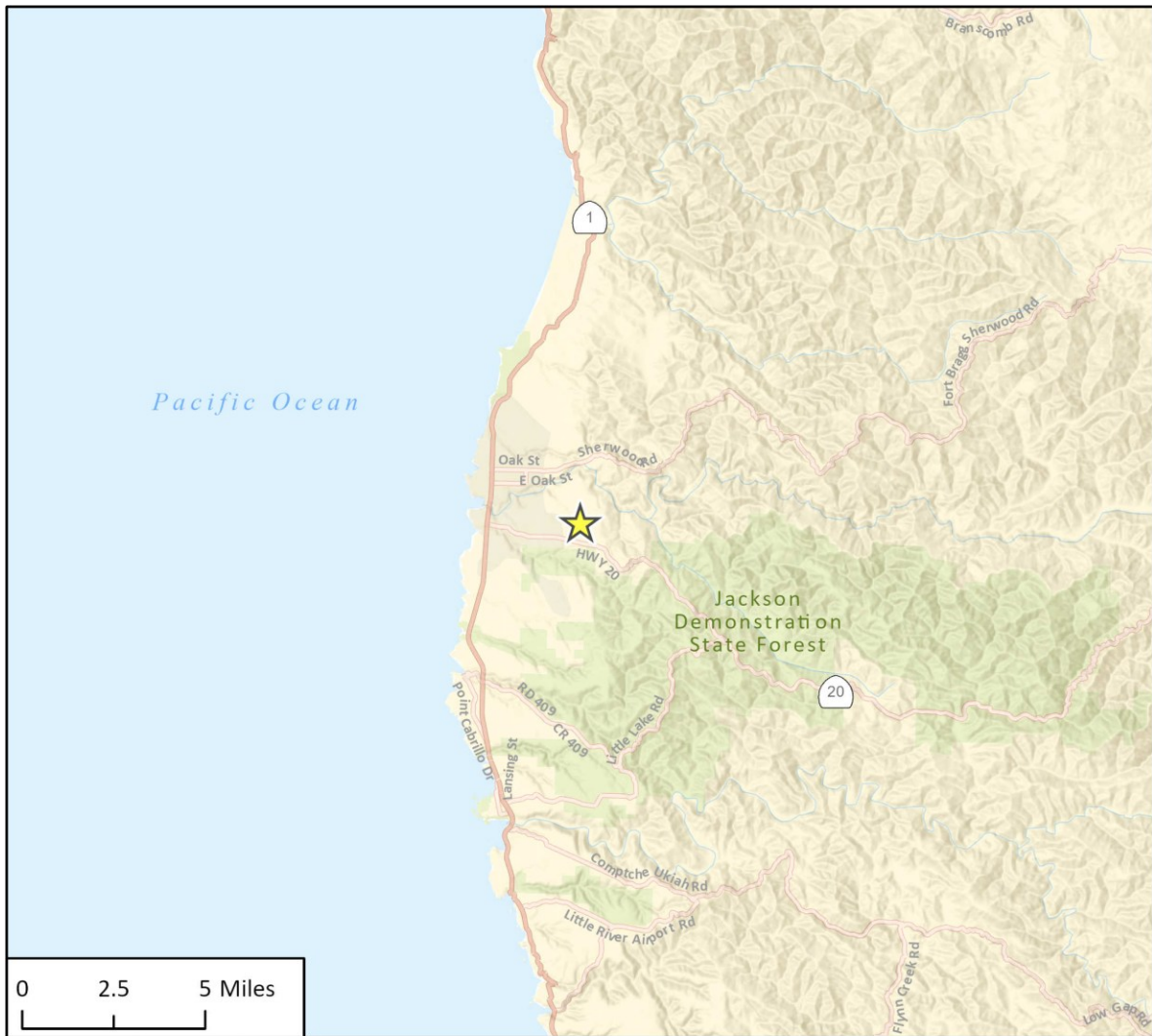
2.1 Project Location

The project site is located southeast of the City of Fort Bragg and north of Highway 20 in Mendocino County, California. See Figure 1 and Figure 2 for the project's regional location and local context of the project site. The project site includes a small portion of four parcels identified by Assessor's Parcel Numbers (APNs) 019-070-10, 019-070-11, 019-080-16, and 019-080-23. The project site is located approximately 2.0 miles east of South Main Street/Highway 1 (a two- to four-lane conventional highway managed by the California Department of Transportation) and is located outside of the Coastal Zone. The project site is immediately southeast of the City's Summers Lane Reservoir. A Pacific Gas and Electric (PG&E) utility easement is located northeast of site, crossing two of the parcels on which the project is located.

The project site is largely undeveloped and contains forest land and dirt roads and trails. Trees present on the project site include Mendocino cypress, bishop pine, redwood, Bolander's beach pine, and pygmy manzanita. The project site has a County General Plan land use designation of Forestland (F-L) and a zoning of Timberland Production (TP) and Forestland (FL). Surrounding areas have residential and forestland land use designations. The project site does not contain creeks, streams, or riparian areas, although there are small unmapped drainages that follow the varied topography of the site. Portions of the site are located adjacent to Freshwater Forested/Shrub Wetland (United States Fish and Wildlife Service 2025a). The project site is located in Zone "X," an area of minimal flood hazard, as shown on Federal Emergency Management Agency's National Flood Hazard Layer FIRMette map number 06045C1017F effective June 2, 2011 (Federal Emergency Management Agency 2025). The project site has variable topography with elevations ranging from approximately 300 feet to 350 feet above mean sea level (United States Geological Survey 2025).

Figure 1 shows the project site in a regional context and Figure 2 shows the project site at a local scale, including the existing dirt access route and the proposed geotechnical boring locations.

Figure 1 Regional Project Location



Imagery provided by Esri and its licensors © 2024.

24-16366 EPS
Fig 1 Regional Location

 Project Location



Figure 2 Project Site Location



Imagery provided by Microsoft Bing and its licensors © 2025.

24-16396 EPS
Fig 3 Soil Bore Locations

2.2 Project Description

The proposed project includes exploratory geotechnical borings throughout the project site intended to inform the engineering design of the City's Water Storage Reservoir Project, including two borings in the proposed trailhead parking area (5 feet in depth), nine borings in the proposed water storage reservoirs area (25 to 50 feet in depth), four borings along the proposed pipeline route (10 to 15 feet in depth), and two borings at the caretaker's unit and storage building (25 feet in depth), as shown in Figure 2. Borings would be up to 4.25 inches in diameter and would be backfilled with grout in order to seal penetration through the oligotrophic soils present at the proposed boring sites. Bore hole destruction methods would follow the Department of Water Resources Bulletin 74 (California Well Standards). Typically, a neat cement grout consisting of about 5 to 6 gallons of water per 94-pound sack of Portland cement is used, which seals the hole and prevents vertical water migration. The upper 1 to 2 feet of the bore holes would be backfilled with soils so revegetation can take place. This method and materials would be stated within the conditions of the drilling permit required from the Mendocino County Environmental Health Department. The County would also inspect the drill hole destruction. The grout mixture is mixed within a barrel on site, with no need for a cement truck. A total of two to six bore holes would be completed per work day, depending on the depth, for a maximum of eight work days. Workers would park in existing disturbed areas within or adjacent to the project site parcels.

The project would use a low ground pressure track-mounted drill rig that is 7.5 feet wide and approximately 15 feet in length to perform the sampling.. Site access would be provided by existing dirt access routes located throughout the project site, as shown in dotted black line in Figure 2. Minimal trimming of vegetation such as removal of overhanging branches may be necessary to bring the rig to the exploration locations, but no site grading will be needed. The actual sampling is the only anticipated ground-disturbing activity, and the borehole sites are all located in already-disturbed areas.

On January 29, 2025, the geotechnical consultant (Bajada Geosciences, Inc.) marked the proposed boring locations. Rhiannon Korhummel, a plant biologist with WRA Environmental Consultants, attended the site visit and ensured that sensitive natural resources were avoided to the maximum extent feasible for the proposed bore hole locations by identifying special-status plants at proposed boring locations, and identifying alternative locations or routes to avoid sensitive species. Some boring locations may require minimal trimming of tree limbs along existing access routes to allow for equipment access.

Prior to the geotechnical boring work, a nesting bird survey would be conducted by a qualified biologist, and sensitive plant individuals would be flagged for avoidance. Trimming activities would avoid flagged plant individuals.

3 Class 6 CE Consistency Analysis

3.1 Class 6 CE Applicability

Section 15306 of the CEQA Guidelines states a Class 6 CE is allowable for projects that involve “basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource. These may be strictly for information gathering purposes, or as part of a study leading to an action which a public agency has not yet approved, adopted, or funded.”

The proposed project involves investigating the reservoirs and community forest through exploratory geotechnical borings and utility-locating potholes to assess site conditions of the pipeline alignment within the project site in Fort Bragg, Mendocino County, between the existing Summers Lane Reservoir and Highway 20. The proposed project has a limited footprint. As described in the following sections, the project would not result in a serious or major disturbance to an environmental resource. Therefore, the proposed project would meet the applicability requirements for a Class 6 CE pursuant to Section 15306 of the CEQA Guidelines.

3.2 Exceptions to CE Applicability

The following sections evaluate whether any of the exceptions to the use of a Class 6 CE pursuant to CEQA Guidelines Section 15300.2 are applicable to the proposed project.

- 15300.2(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.

According to the United States Fish and Wildlife Service and National Marine Fisheries Service Map Viewer, there are no federally designated critical habitats located within the project boundary (United States Fish and Wildlife Service 2025b; National Marine Fisheries Service 2025). The project site is not located within the coastal zone, a Habitat Conservation Plan boundary, or other state or locally designated protected area. The National Wetlands Inventory identifies Freshwater Forested/Shrub Wetlands within the project site; however, bore holes would be located outside of this area.

The project site is located within Mendocino cypress forest (also known as pygmy cypress forest), a sensitive natural community tracked by the California Department of Fish and Wildlife (CDFW) and can be found in both the California Natural Diversity Database (CNDDDB) and in the Biogeographic Information and Observation System (BIOS) (CDFW 2025a and 2025b). CDFW considers plant communities sensitive biological resources if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance. Vegetation rarity ranking is based on a rank calculator developed by NatureServe. Mendocino cypress is ranked G1/S1 and is considered critically imperiled. The site is located outside the Mendocino Local Coastal Program (LCP) area protecting pygmy vegetation. Project impacts would be limited to minor ground

disturbance within previously disturbed areas along existing access roads and therefore would not result in a serious or major disturbance to Mendocino cypress forest.

According to a search of the State Water Resources Control Board GeoTracker database and the Department of Toxic Substances Control EnviroStor database conducted in 2025, there are no active or inactive hazardous waste sites on the project site (California State Water Resources Control Board 2025; California Department of Toxic Substances Control 2025).

Therefore, there are no environmental resources of hazardous or critical concern designated, precisely mapped, and/or officially adopted pursuant to law by federal, state, or local agencies on the project site that would be impacted by the exploratory geotechnical borings.

The proposed project would involve the excavation of up to 17 bore holes within the project site. The drill rig would utilize existing access routes. Overhanging vegetation would be limbed in some locations to allow access of the drill rig to some of the bore hole locations. The project would have a very limited footprint, and all bore holes would be backfilled with grout and native soil, as described in Section 2.2, *Project Description*. Based on the limited disturbance boundary and restoration to pre-project conditions, the exploratory geotechnical borings would not impact any environmental resources of hazardous or critical concern. This exception to a CE does not apply to the proposed project.

15300.2(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 would not result in significant environmental impacts and there are no other successive projects of the same type or scale planned in the immediate vicinity of the proposed project as the site is surrounded by undeveloped forestland. Therefore, no significant cumulative impact would result from successive projects of the same type in the same place over time. This exception to a CE does not apply to the proposed project.

15300.2(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.

The circumstances of the proposed project, which would result in exploratory geotechnical borings, are not considered unusual because: the project site is an undeveloped forest area and project activities would not preclude existing uses of the site; and exploratory geotechnical borings are common practice when utility infrastructure is proposed in a location in order to gather information to inform the engineering design of the project. In addition, the proposed bore hole locations are sited along a previously disturbed, existing dirt access road. Therefore, the project would not result in a serious or major substantial or permanent disturbance due to any unusual circumstances. The circumstances of the project would not result in the possibility of a significant effect on the environment, and this exception to a CE does not apply to the proposed project.

- 15300.2(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 EIR.

There are no officially designated State scenic highways within the vicinity of the project site; however, State Route (SR) 20 is listed as an eligible State scenic highway (California Department of Transportation 2025). SR 20 provides access to the project site from the south; however, the dense vegetation of the project site would block views of work to be conducted within the project site from travelers along SR 20. In addition, project work would be temporary and the project would not introduce permanent infrastructure at the site. Therefore, the proposed project would not damage scenic resources within a highway officially designated as a state scenic highway. Consequently, this exception to a CE does not apply to the proposed project.

- 15300.2(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.

Based on the review of the State Water Resources Control Board GeoTracker Database, California Department of Toxic Substances Control Envirostor Database, the List of Solid Waste Disposal Sites, the List of “active” Cease and Desist Orders and Cleanup Abatement Orders, and the List of Hazardous Waste Facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, the project site is not included on existing lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (State Water Resources Control Board 2025; California Department of Toxic Substances Control 2025; California Environmental Protection Agency 2025a, 2025b, 2025c). The project site is not included on a list compiled pursuant to Section 65962.5 of the Government Code and this exception to the applicability and use of a CE does not apply to the project.

- 15300.2(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.

There are no structures on the project site in areas where work is proposed to occur. The proposed investigation activities would not alter any existing structures. The project site is surrounded by undeveloped land and the project would not remove or alter permanent buildings or structures. Therefore, this exception is not applicable to the proposed project.

4 Summary

Based on this analysis, the proposed Geotechnical Borings for Water Storage Reservoirs Project meets all criteria for a Class 6 Categorical Exemption pursuant to Section 15306 of the State CEQA Guidelines and is exempt from CEQA pursuant to CEQA Guidelines Article 19.

5 References

- California Department of Fish and Wildlife Services (CDFW). 2025a. California Natural Diversity Database (CNDDDB) <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data> (accessed March 2025).
- _____. 2025b. BIOS database. <https://apps.wildlife.ca.gov/bios6/> (accessed March 2025).
- California Department of Toxic Substances and Control. 2025. Envirostor. <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=Search> (accessed February 2025).
- California Department of Transportation. 2025. California State Scenic Highway System Map. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca> (accessed February 2025).
- California Environmental Protection Agency. 2025a. Sites Identified With Waste Constituents Above Hazardous Waste Levels Outside The Waste Management Unit. <https://calepa.ca.gov/SiteCleanup/CorteseList/> (accessed March 2025).
- _____. 2025b. List of “active” CDO and CAO from Water Board. <https://calepa.ca.gov/SiteCleanup/CorteseList/> (accessed March 2025).
- _____. 2025c. List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC. <https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/> (accessed March 2025).
- California State Water Resources Control Board. 2025. Geotracker. <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Search+GeoTracker#> (accessed February 2025).
- Federal Emergency Management Agency. 2025. FEMA’s National Flood Hazard Layer Viewer. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-121.94529102661183,36.5159779735144,-121.90374897338809,36.53322138877889> (accessed February 2025).
- Keeler-Wolf, T., D. Hickson, R. Yacoub and M.J. Colletti. 2019. Classification and Mapping of Mendocino Cypress (*Hesperocyparis pygmaea*) Woodland and Related Vegetation on Oligotrophic Soils, Mendocino and Sonoma Counties, California. Vegetation Classification and Mapping Program, California Department of Fish and Wildlife, Sacramento, CA.
- United States Fish and Wildlife Service. 2025a. National Wetlands Inventory. <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/> (accessed February 2025).
- _____. 2025b. USFWS Critical Habitat. https://www.arcgis.com/apps/mapviewer/index.html?url=https://services.arcgis.com/QVENGdaPbd4LUkLV/ArcGIS/rest/services/USFWS_Critical_Habitat/FeatureServer&source=sd (accessed February 2025).

_____. 2025c. IPAC database.
<https://ipac.ecosphere.fws.gov/location/RH2E6W4KHZASBI5HN3BO2KIHGE/resources>
(accessed March 2025).

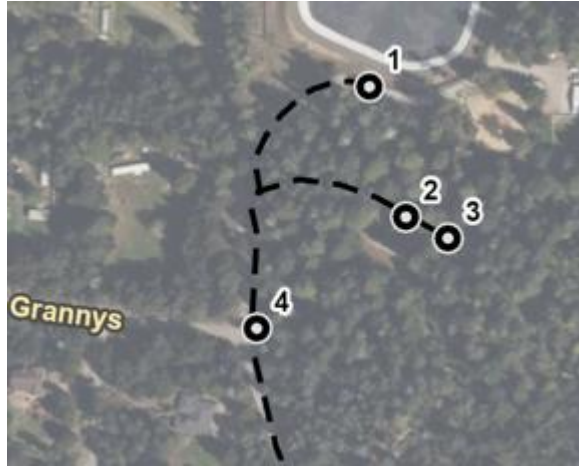
United States Geological Survey. 2025. 7.5-minute Topo Quadrangle, Custom Extent. 2025.

Exhibit A

Photographs of Proposed Borehole Locations and Access in Areas
Where Satellite Imagery May Not Indicate Existing Disturbed Area



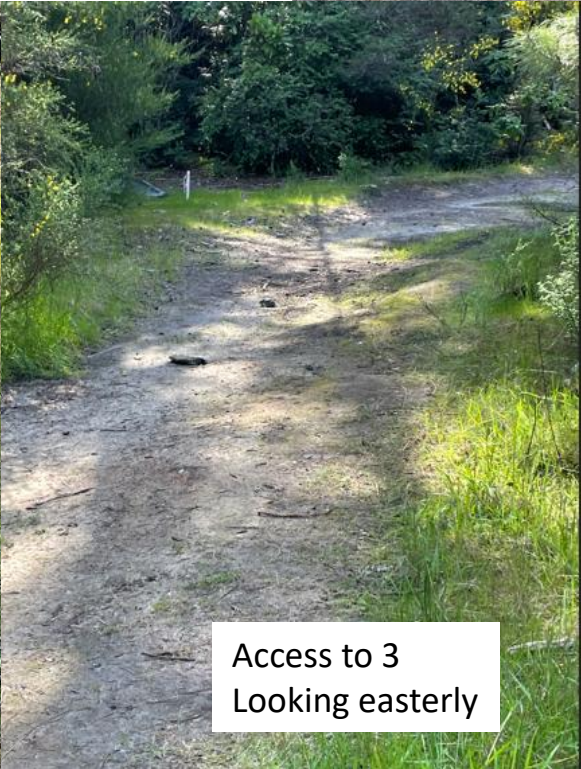
Point 2



Point 3

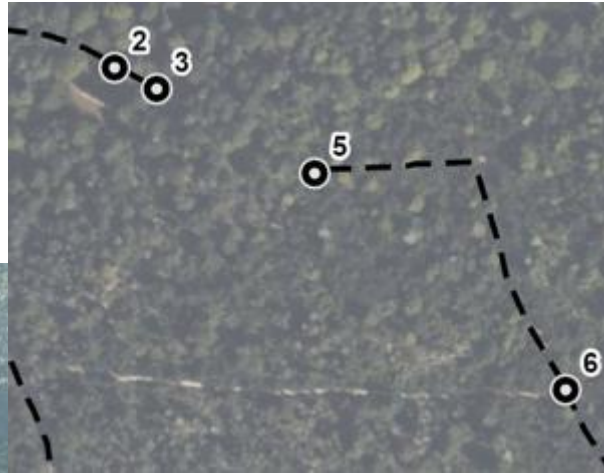


Access to 2
Looking easterly

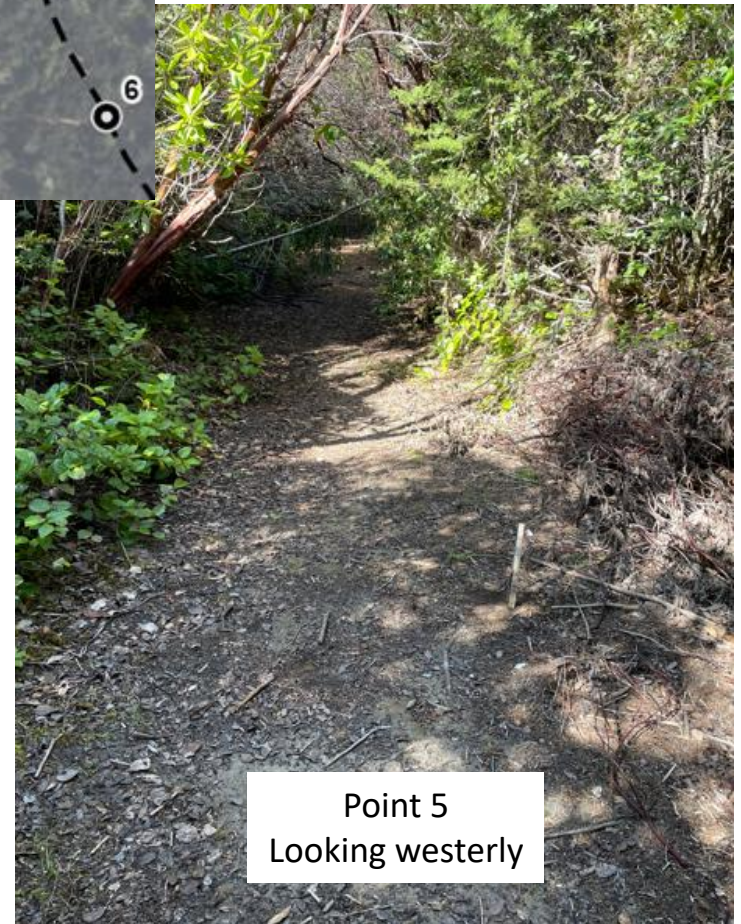


Access to 3
Looking easterly

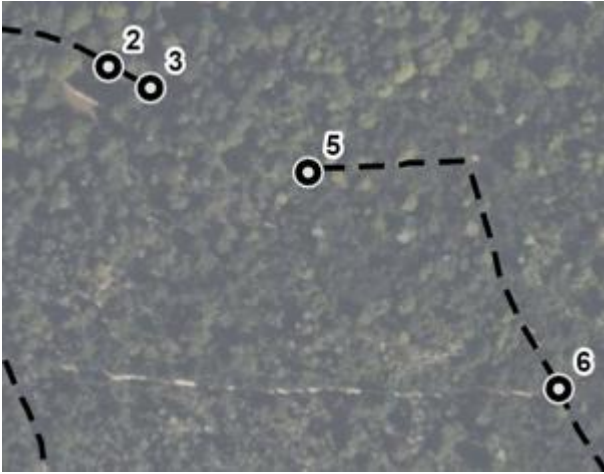
Note: Point 5 is located along an existing trail even though it may not appear so in the satellite imagery

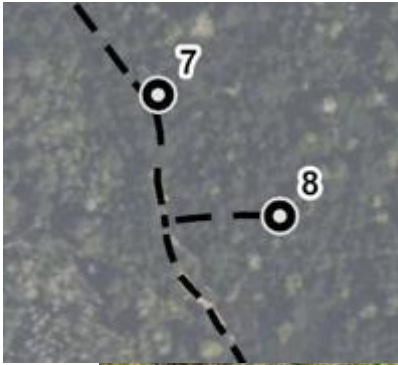


Point 5
Looking easterly

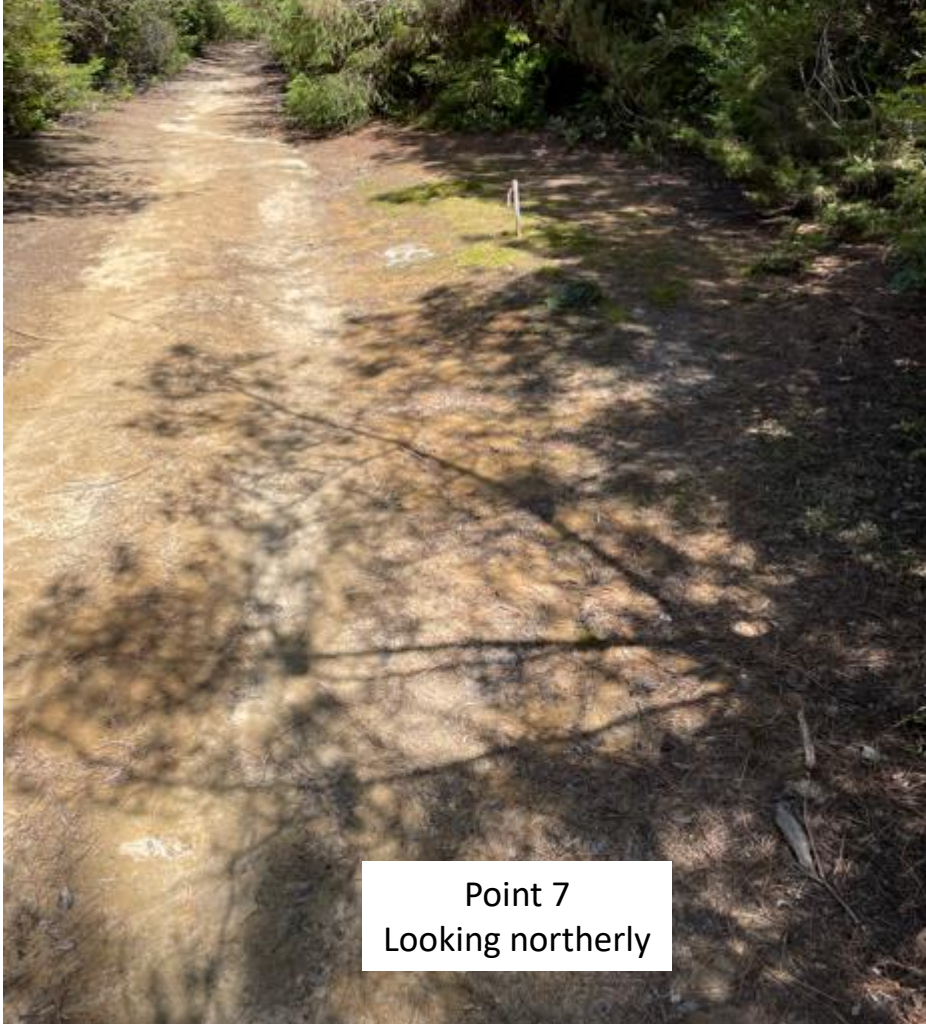


Point 5
Looking westerly





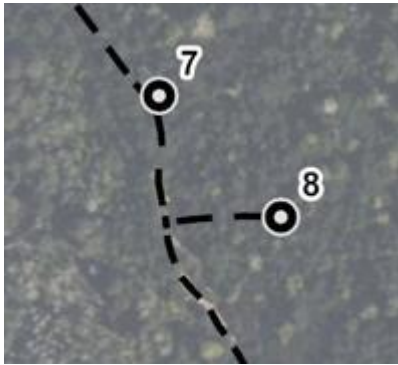
Note: Point 8 is located along an existing trail even though it may not appear so in the satellite imagery



Point 7
Looking northerly



Point 8
See next slide for access



Note: Point 8 is located along an existing trail even though it may not appear so in the satellite imagery



Point 8
Looking easterly along trail



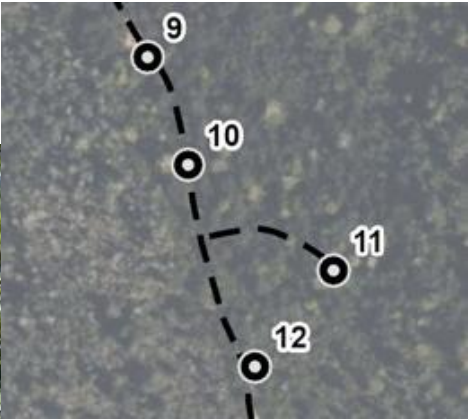
Point 8 access
Looking westerly to main trail



Point 8 access
Looking easterly from main trail



Note: Points 11, 13 and 15 are located along an existing trail even though it may not appear so in the satellite imagery



Access to 11
Looking northerly

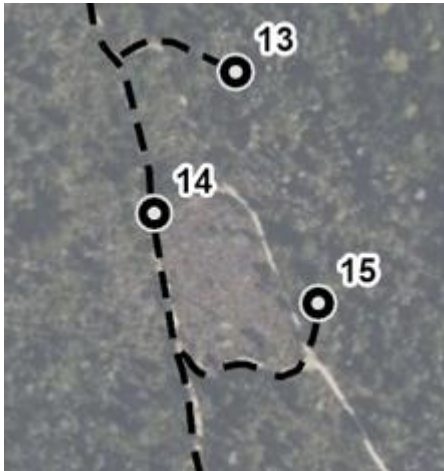


Point 11



Point 12

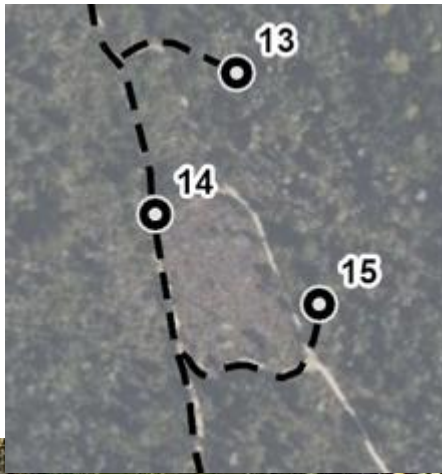
Note: Points 11, 13 and 15 are located along existing trails even though it may not appear so in the satellite imagery



Point 13
Looking northerly
Access to west and north-south



Point 14
Looking easterly off main trail



Note: Points 11, 13 and 15 are located along existing trails even though it may not appear so in the satellite imagery

