



*Civil, Water, Wastewater, Drainage, Transportation and
Electrical/Controls Engineering • Construction Management • Surveying
California • Arizona*

MEMORANDUM

October 16, 2025

From: Shem Hawes

To: Jim Prior

Subj: Request for review and approval of Categorical Exemption as compliance with CEQA for the San Gabriel County Water District (Well 12 Arsenic Treatment System Project)

The San Gabriel County Water District (SGCWD or District) provides potable water service to residential and commercial customers in the City of Rosemead and surrounding unincorporated areas of Los Angeles County. The well 12 Arsenic Treatment System Project involves the comprehensive design and construction of upgrades to the existing Well 12 facilities, located at 8366 Grand Avenue, Rosemead, California 91770, on City of Rosemead property at the northwest corner of Delta Avenue and East Grand Avenue.

The existing well 12 currently provides groundwater production and disinfection via chlorination and post-blending with well 11 but does not include any onsite treatment for arsenic removal. Since 2023, water quality data have indicated that arsenic concentrations exceeding the state's maximum contaminant level (MCL), triggering an operational alarm with the Division of Drinking Water (DDW). To achieve compliance and maintain safe drinking water delivery, the District proposes to construct a new Media-Based Pressurized-Vessel Treatment System designed for arsenic removal, in conjunction with the blending of treated well 12 water and well 11 waters prior to distribution.

The project will incorporate pre-purchased treatment system equipment from Clear Creek Systems, Inc., including treatment vessels, pumps, valves, and control components, which are currently under detailed engineering and submittal review. Site improvements will include a reinforced concrete foundation pad for the treatment vessels, a new Southern California Edison (SCE) transformer and yard piping. All proposed work will occur entirely within the existing developed well 12 site, representing minor modifications to existing facilities with no expansion of use or capacity.

Categorical exemptions are identified in Section 15300 of the State CEQA Guidelines as “a list of classes of projects which have been determined not to have a significant effect on the environment and which shall, therefore, be exempt from the provision of CEQA.” To determine whether a project is categorically exempt from CEQA, certain findings must be made for a project to verify that it qualifies for a specific exemption class and that it can appropriately be exempted from the requirement for the preparation of a higher-level environmental document.

The first step in this exemption process is to determine whether a specific project conforms with the criteria outlined in one or more of the exemption classes. After careful review of the various exemption classes, I have concluded and recommend to the district that the proposed SGCWD well 12 Arsenic Treatment System Project meets the criteria for both Class 1 and Class 2 Exemptions. Class 1 consists of “Existing Facilities,” and Class 2 consists of “Replacement or Reconstruction” outlined under Section 15301 and 15302 of the State CEQA guidelines.

Class 1 exemptions consist of *“the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use.”* Class 2 exemptions consist of *“the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use.”*

Proceeding with this analysis under the assumption that the San Gabriel County Water District Well 12 Arsenic Treatment System Project qualifies for both Class 1 and Class 2 exemptions, the next, and final, set of criteria to be evaluated for the applicability of this exemption consists of a series of exception issues, which must be considered for certain exemptions. The exception issues are described in Section 15300.2 of the State CEQA Guidelines and consist of the following issues of concern: location, cumulative impact, significant effect, scenic highway, hazardous waste sites and historical resource limitations on the use of categorical exemptions. These issues are addressed below in the order presented in the preceding list.

- A. Location: The project is located within an existing engineered facility site in the City of Rosemead. The property is owned and operated by SGCWD. The site is previously disturbed and developed with utility infrastructure and hardscape improvement. No native soil, vegetation, or biological habitat are present. Therefore, there is no potential for significant impacts related to biological, cultural, or archaeological resources.
- B. Cumulative Impact: The project will not expand the district’s water supply capacity or change overall operations. Its purpose is solely to improve arsenic removal efficiency and maintain regulatory compliance. No cumulative impacts are anticipated.
- C. Significant Effect: Construction and operation of the proposed improvements will not cause significant environmental effects. All work will be continued to the existing site and limited in scope to equipment and foundation installations.
- D. Scenic Highway: The site is not located along or visible from any state or county-designated scenic highway. The proposed project will not affect scenic resources.
- E. Hazardous Waste Sites: No hazardous waste sites are listed within or adjacent to the project site. The installation of new treatment and electrical systems will not create or expose the public or workers to hazardous conditions.
- F. Historical Resources: The well 12 site has been previously disturbed and improved. No historical or archaeological resource of significance are present or expected to occur within the project area.

Based on the evaluation presented above, the proposed San Gabriel County Water District Well 12 Arsenic Treatment System Project qualifies under Class 1 (Existing Facilities) and Class 2 (Replacement or Reconstruction) categorical exemptions of the California Environmental Quality Act (CEQA) guidelines (section 15301 and 15302). It is recommended that the District approve the project as Categorically Exempt from CEQA and authorize filing of the Notice of Exemption (NOE) with the Los Angeles County Clerk and State Clearinghouse. This filing will initiate the 35-day status of limitations period for any potential legal challenge.

If you have any questions, please do not hesitate to contact us.

Shem Hawes, P.E.

Attachments: Draft Notice of Exemption