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MEMORANDUM

DATE: September 16, 2026

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

FROM: Pam Reading, Principal Environmental Planner, LSA
Laurel Huntzinger, Associate Environmental Planner, LSA
Ashley Honer, Environmental Planner, LSA

SUBJECT: Class 1 Categorical Exemption for the Proposed Reservoir 5A1 Rehabilitation Project in Dana Point, California

LSA is pleased to submit this memorandum in consideration of a Class 1 Categorical Exemption for the proposed Reservoir 5A1 Rehabilitation Project in the City of Dana Point, California

PROJECT DESCRIPTION

The South Coast Water District (District) is proposing the Reservoir 5A1 Rehabilitation Project (proposed project), which consists of various modifications and improvements to rehabilitate a potable water storage tank (Reservoir 5A1) in the City of Dana Point (City). As shown on Figure 1, Project Location (provided in Attachment A), the project site (Reservoir 5A1) is located in the northwestern portion of the city, west of Sea Canyon Park, north of Monarch Beach Park, and south and east of single-family residential neighborhoods. The project site is accessed via Saint Kitts Road in the gated Monarch Beach community.

Land uses in the vicinity of the project site primarily include residential and recreational uses. The project site is zoned as Community Facilities (CF) in the City's Zoning Code and is designated as Community Facility (CF) in the City's General Plan. Surrounding areas are designated as Recreation/Open Space (R/OS), Residential 3.5-7 DU/AC (RES 3.5-7) and Residential 7-14 DU/AC (RES 7-14) in the City's General Plan and are zoned Recreation (REC), Open Space (OS), Residential Single Family 12 DU/AC (RSF 12), and Residential Single Family 7 DU/AC (RSF 7) in the City's Zoning Code. The project site is not located within the California Coastal Zone.

The proposed project includes various modifications and improvements to rehabilitate Reservoir 5A1. Project activities would include recoating the tank, completion of interior and exterior piping modifications on the tank, and minor site work around the tank. Specifically, the proposed project would include the following modifications and improvements to existing infrastructure on Reservoir 5A1:

- Removal of the existing exterior coating and interior lining of the reservoir and application of a new coating on the interior and exterior of the reservoir including above grade piping, valves, exterior ladder and cage, roof access hatch, valves and piping in the valve pit, and appurtenances;
- Removal and modification of the existing inlet and outlet pipes and overflow pipe;
- Removal and replacement of the existing shell manway, guard railings, altitude valve, roof hatch, interior ladder, roof vent, cathodic protection handhole access, water level indicator, and sample tap;
- Construction of a self-closing gate and fall protection system on the existing ladder;
- Abandoning in place the existing tank drain and removal and disposal of the existing valve;
- Furnish and installation of a new drain pipe and sealing gaskets for the tank hatches and manways; and
- Installation of caulking at the base of reservoir to ring wall joint around the entire reservoir.

The proposed project would require minor excavation that would not exceed 5 feet in depth for the proposed piping improvements adjacent to the reservoir. Excavation and land disturbance activities would occur within land that was previously disturbed to construct the existing reservoir and associated infrastructure. The proposed project would not disturb or modify any roadways. The purpose of the proposed project is to resolve existing safety and reliability issues. Implementation of the proposed project would not necessitate future construction of additional utility infrastructure. Therefore, the proposed project would not expand the use of the District's utility infrastructure.

CALIFORNIA ENVIRONMENTAL QUALITY ACT, SECTION 15301, CLASS 1 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 15301(b) of the CEQA Guidelines (Class 1, Existing Facilities), consistent with the provisions of *State CEQA Guidelines* Sections 15301 and 15300.2. Specifically, the information provided herein shows the following:

- a. The project qualifies for an exemption under *State CEQA Guidelines* Sections 15301 (i.e., Class 1) 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 15301, a Class 1 exemption is applicable to projects that consist of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing structures and/or facilities, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination. The proposed project would closely align with *State CEQA Guidelines* Section 15301(b) and (d):

(b) Existing facilities of both investor and publicly-owned utilities used to provide electric power, natural gas, sewerage, or other public utility services.

(d) Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety, unless it is determined that the damage was substantial and resulted from an environmental hazard such as earthquake, landslide, or flood.

The proposed project includes rehabilitation work on an existing water storage reservoir to resolve existing safety and reliability issues. The proposed construction would constitute a minor alteration of existing facilities with no expansion of use beyond the existing condition. The proposed project would be consistent with the existing use of the project site. The proposed project would be supported by existing infrastructure and utility systems at the project site. No new or expanded infrastructure or utility systems are required. The proposed project would repair and replace existing components of the reservoir and therefore, would not change the purpose or function of the reservoir, or result in the addition or expansion of uses associated with the reservoir. Excavation and land disturbance activities would not exceed 5 feet in depth and would occur within land that was previously disturbed to construct the existing reservoir and associated infrastructure. Construction vehicles would access the project site via existing roads, and construction staging areas would be located on currently developed areas. Therefore, the proposed project would not involve any expansion of use beyond the District's existing utility infrastructure.

As the proposed project properly qualifies for an exemption under *State CEQA Guidelines* Section 15301 (i.e., Class 1), 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 Categorical Exemption (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 15301 (Class 1) 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.

The proposed project does not rely on the specific classes of exemptions 3, 4, 5, 6, and 11 called out at the beginning of exception 15300.2(a). Nonetheless, if this exception were applicable to a Class 1 exemption, the proposed project would still not qualify as an exception to the exemption.

As shown in Figure 1, the entire project site is located within a developed area within Dana Point, which itself is in an urbanized area of Orange County. There are no habitable structures or vegetation present on the project site. No special-status species are expected to occur on the project site in its existing condition because there is no suitable habitat. The proposed project would not involve the removal of any trees or vegetation on the project site or in the nearby vicinity and, therefore, would not impact nesting birds. The project site is not included on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5,¹ including the Department of Toxic Substances Control (DTSC) EnviroStor,² the State Water Resources Control Board (SWRCB) GeoTracker,³ the list of solid waste disposal sites identified by the Water Board with waste constituents above hazardous waste levels outside the waste management unit,⁴ and the list of site cleanup program sites on the Cortese List from the Water Boards.⁵ Therefore, 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 rehabilitation work on an existing water storage reservoir to resolve existing safety and reliability issues. Temporary work would be limited to the existing reservoir and its immediately adjacent disturbed areas. Future construction of additional utility infrastructure would not be necessary as a result of implementation of the proposed project.

¹ California Environmental Protection Agency (CalEPA). 2026. Cortese List Data Resources. Website: <https://calepa.ca.gov/sitecleanup/corteselist/> (accessed August 20, 2026).

² Department of Toxic Substances Control (DTSC). 2026. Envirostor. Website: https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29 (accessed August 20, 2026).

³ State Water Resources Control Board (SWRCB). 2026a. *Geotracker*. Website: https://geotracker.waterboards.ca.gov/search?CMD=search&case_number=&business_name=&main_street_name=&city=&zip=&county=&SITE_TYPE=LUFT&oilfield=&STATUS=&BRANCH=&MASTER_BASE=&Search=Search (accessed August 20, 2026).

⁴ SWRCB. 2026b. *Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit*. Website: https://calepa.ca.gov/wp-content/uploads/2026/02/CorteseList-Solid-Waste-Facilities_2026.pdf (accessed August 20, 2026).

⁵ SWRCB. 2026c. *2026 Cortese List – Site Cleanup Program*. Website: https://calepa.ca.gov/wp-content/uploads/2026/03/2026_scp_cortese.list_lat.long_.pdf (accessed August 20, 2026).

The proposed project would be supported by existing infrastructure and utility systems at the project site. No new or expanded infrastructure or utility systems are required.

The proposed project does 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 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.

The proposed project includes rehabilitation work on an existing water storage reservoir to resolve existing safety and reliability issues. The scope of work would be limited to the boundaries of the project site. The proposed project is consistent with the ordinary maintenance and repair activities covered by Class 1. Furthermore, no unusual circumstances have been identified in or around the project site that would result in significant environmental impacts. Excavation and land disturbance activities would not exceed 5 feet in depth and would occur within land that was previously disturbed to construct the existing reservoir and associated infrastructure. No amendments to an adopted planning document would be required for implementation of the proposed project. Given the urban and developed nature of the project site and the surrounding area, there is no evidence to indicate that the proposed project would 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 rehabilitation work on an existing water storage reservoir to resolve existing safety and reliability issues. The proposed site is not located on or along an officially designated State scenic highway. The proposed project is approximately 1.75 miles southeast and northwest of portions of the Pacific Coast Highway that are listed as eligible as a State scenic highway. Additionally, the project site is approximately 1.85 miles west of a portion

of Interstate 5 that is listed as eligible as a State scenic highway.⁶ The project site would not be visible to travelers on Pacific Coast Highway or Interstate 5. Therefore, the proposed project would not result in damage to existing scenic resources within an officially designated State scenic highway. Therefore, 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.

As discussed above, the project site is not included on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5,⁷ including the DTSC EnviroStor,⁸ the SWRCB GeoTracker,⁹ the list of solid waste disposal sites identified by the Water Board with waste constituents above hazardous waste levels outside the waste management unit,¹⁰ and the list of site cleanup program sites on the Cortese List from the Water Boards.¹¹ 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 rehabilitation work on an existing water storage reservoir to resolve existing safety and reliability issues. The project site is fully developed and has undergone substantial surficial and subsurface disturbance. The areas immediately surrounding the project site are also primarily developed. Excavation and land disturbance activities would not exceed 5 feet in depth and would occur within land that was previously disturbed to construct the existing reservoir and associated infrastructure. Therefore, the proposed project

⁶ 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 September 1, 2026).

⁷ California Environmental Protection Agency (CalEPA). 2026. Cortese List Data Resources. Website: <https://calepa.ca.gov/sitecleanup/corteselist/> (accessed August 20, 2026).

⁸ DTSC. 2026. Envirostor. Website: https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29 (accessed August 20, 2026).

⁹ SWRCB. 2026a. *Geotracker*. Website: https://geotracker.waterboards.ca.gov/search?CMD=search&case_number=&business_name=&main_street_name=&city=&zip=&county=&SITE_TYPE=LUFT&oilfield=&STATUS=&BRANCH=&MASTER_BASE=&Search=Search (accessed August 20, 2026).

¹⁰ SWRCB. 2026b. *Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit*. Website: https://calepa.ca.gov/wp-content/uploads/2026/02/CorteseList-Solid-Waste-Facilities_2026.pdf (accessed August 20, 2026).

¹¹ SWRCB. 2026c. *2026 Cortese List – Site Cleanup Program*. Website: https://calepa.ca.gov/wp-content/uploads/2026/03/2026_scp_cortese.list_lat.long_.pdf (accessed August 20, 2026).

would not cause a substantial adverse change in the significance of a historical resource and *State CEQA Guidelines* Section 15300.2(f) does not apply to the proposed project.

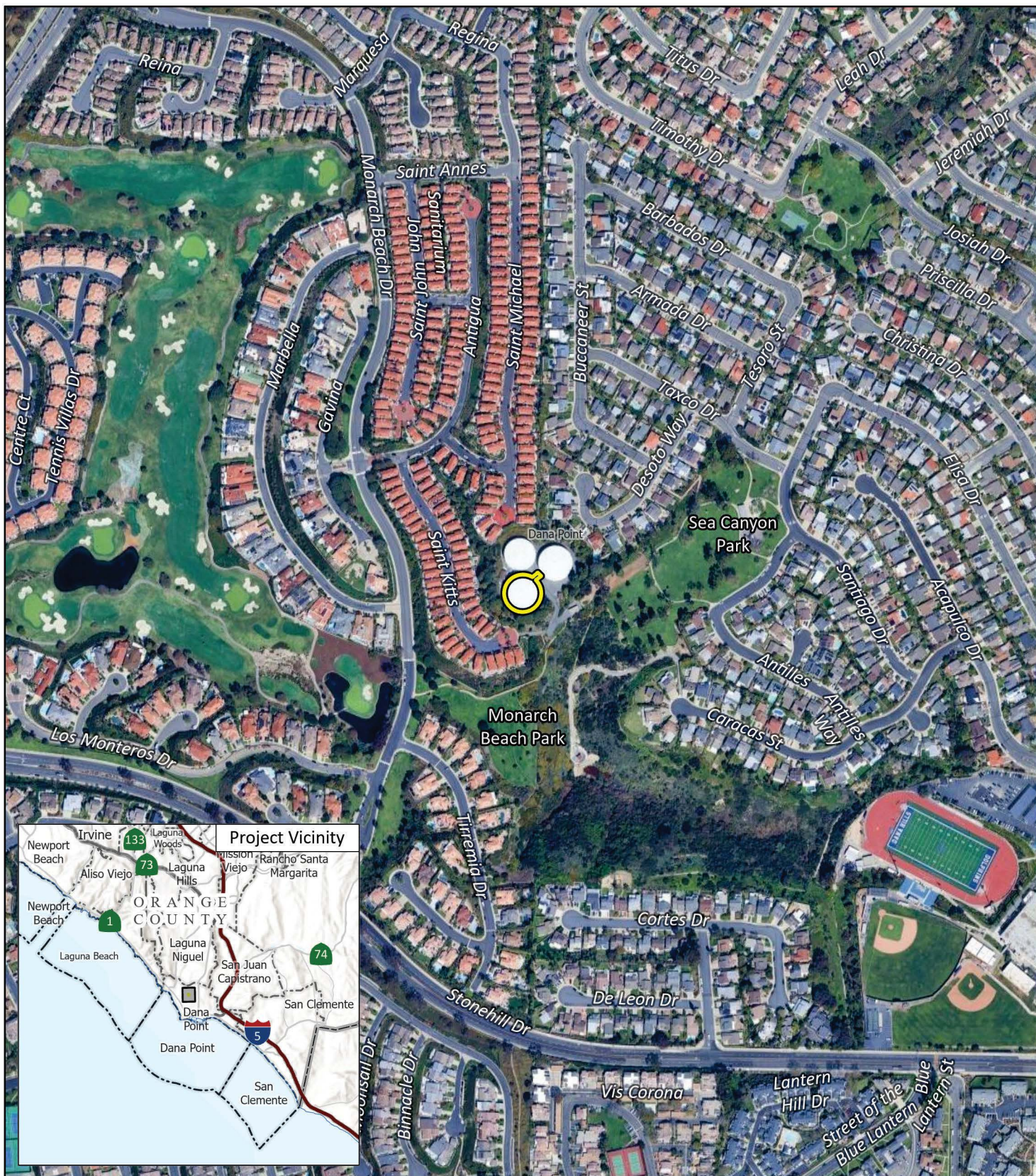
CONCLUSION

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 15301. 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: Project Location

ATTACHMENT A

FIGURE 1



LSA

 Project Location

 California Municipalities



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SOURCE: U.S. Census Bureau (2026), Google Maps (2026)

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FIGURE 1

Reservoir 5A1 Rehabilitation Project
Project Location