



CARLSBAD
CLOVIS
EMERYVILLE
IRVINE
LOS ANGELES
PALM SPRINGS
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

MEMORANDUM

DATE: September 21, 2026

TO: Bryan Kallenbaugh, PE, 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 2 Categorical Exemption for the Proposed Groundwater Recovery Facility Brine Line Improvement Project in Dana Point, California

LSA is pleased to submit this memorandum in consideration of a Class 2 Categorical Exemption for the proposed Groundwater Recovery Facility Brine Line Improvement Project in Dana Point, California.

PROJECT DESCRIPTION

The South Coast Water District (District) is proposing the Groundwater Recovery Facility Brine Line Improvement Project (proposed project), which would include the installation of a bypass pipeline for the reverse osmosis concentrate discharge at the District's Groundwater Recovery Facility (GRF) in the City of Dana Point. Refer to Figure 1, Project Location, provided in Attachment A.

The GRF treats one million gallons per day of brackish ground water that is pumped from the San Juan Basin, using reverse osmosis (RO) and an iron and manganese treatment system. An existing 18-inch brine line at the GRF conveys various residuals generated from the treatment process to an ocean outfall. The existing brine line is fed by five flow lines, including the iron/manganese backwash, RO concentrate, well flush, product water bypass, and RO trench sump drain line. These lines converge at an air gap structure, which extends 10 feet above grade and 9 feet below grade, before being conveyed to the ocean outfall pipeline via the existing brine line. The discharge of concentrate through the air gap structure has resulted in a buildup of precipitates within the existing brine line which has resulted in critical blockages within the pipe.

The proposed project includes installation of a 6-inch RO concentrate bypass pipeline within the GRF that would discharge to the existing 42-inch ocean outfall pipeline via connection to an existing standpipe on the outfall pipeline. The proposed pipeline would allow the RO concentrate to bypass the air gap structure, thereby decreasing the build-up of precipitates. The existing 18-inch brine line would remain in service and continue to transport the other waste streams such as the treatment

building waste sump, finished product water bypass, raw water well flush, and iron and manganese backwash to the ocean outfall. The proposed project would not introduce any new waste flows but would eliminate build-up in the lines by modifying how the waste streams reach the ocean outfall pipeline. The proposed project involves the following construction-related activities (see Figure 2, Project Site):

- Installation of approximately 270 linear feet of buried 6-inch HDPE RO concentrate bypass pipeline within the GRF and into Paseo Costa Sur;
- Installation of a 6-inch back flow device and bollards;
- Removal and replacement of aboveground sections of existing concrete air gap structure;
- Removal and replacement of aboveground piping connected to the air gap structure;
- Scaling and cleaning of remaining below grade air gap structure;
- Scaling and cleaning of existing 18-inch brine waste line; and
- Removal and replacement of existing outfall standpipe connection and vault in Paseo Costa Sur.

The proposed RO concentrate bypass pipeline would be installed at a depth of 3 to 4 feet below ground surface (bgs) and would require a maximum depth of 4 to 5 feet of excavation bgs. Construction activities associated with the proposed project would result in a total disturbed area of approximately 900 square feet. The proposed improvements would be limited to the District's GRF property with a small portion extending into the roadway, which is also a District property. All land disturbance activities would occur within land that has been previously disturbed to construct the existing GRF and associated utility lines and roadway.

The project site is located east of San Juan Creek, and south of Stonehill Drive. Land uses in the vicinity of the project site include industrial, residential, and commercial. The project site is zoned as Industrial/Business (I/B) in the City's Zoning Code and is designated as Industrial/Business Park (I/BP) in the City's General Plan. Surrounding areas are zoned as Industrial/Business (I/B) and Open Space (OS) in the City of Dana Point Zoning Code and Commercial Manufacturing (CM), Mobile Home Park, Senior Overlay (MHP - SO), and Specific Plan (SP) in the City of San Juan Capistrano Zoning Code. Surrounding areas are designated as Industrial/Business Park (I/BP) and Recreation/Open Space (R/OS) in the City of Dana Point General Plan and Quasi Industrial (QI) and General Open Space (GOS) in the City of San Juan Capistrano General Plan. The project site is not located within 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 15302(c) of the CEQA Guidelines (Class 2, Replacement or Reconstruction), consistent with the provisions of *State CEQA Guidelines* Sections 15302 and 15300.2. Specifically, the information provided herein shows the following:

- a. The project qualifies for an exemption under *State CEQA Guidelines* Sections 15302 (i.e., Class 2) 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 15302, a Class 2 exemption is applicable to projects that consist of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced. The proposed project would closely align with *State CEQA Guidelines* Section 15302(c):

(c) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.

The proposed project includes the installation of an RO concentrate bypass pipeline and associated improvements including a back flow device, outfall connection and vault, and air gap structure improvements for the reverse osmosis brine line at the District's GRF. The proposed project also includes the scaling and cleaning of the existing air gap structure and 18-inch brine waste line. All excavation and land disturbance activities would occur within land that has been previously disturbed to construct the existing GRF and associated utility lines and roadway. 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 15302 (i.e., Class 2), 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 15302 (Class 2) 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 2 exemption, the proposed project would still not qualify as an exception to the exemption.

As shown on Figure 1, the project site is located within a developed area within Dana Point, which itself is in an urbanized area of Orange County. There is no 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 the installation of an RO concentrate bypass pipeline and associated improvements including a back flow device, outfall connection and vault, and air gap structure improvements for the reverse osmosis brine line at the District's GRF. The proposed project also includes the scaling and cleaning of the existing air gap structure and 18-inch brine

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

waste line. All excavation and land disturbance activities would occur within land that has been previously disturbed by construction of the existing GRF and associated utility lines and roadway.

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 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 an RO concentrate bypass pipeline and associated improvements including a back flow device, outfall connection and vault, and air gap structure improvements for the reverse osmosis brine line at the District's GRF. The proposed project also includes the scaling and cleaning of the existing air gap structure and 18-inch brine waste line. The proposed project would not require any road closures, and all excavation and land disturbance activities would occur within land that has been previously disturbed by construction of the existing GRF and associated utility lines and roadway. No work would occur outside of the project limits and roadway. 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 an RO concentrate bypass pipeline and associated improvements including a back flow device, outfall connection and vault, and air gap structure improvements for the reverse osmosis brine line at the District's GRF. The proposed project also includes the scaling and cleaning of the existing air gap structure and 18-inch brine waste line. The proposed project is approximately 0.2 mile west of a portion of Interstate 5 that

is designated as an eligible State scenic highway.⁶ Due to intervening development and vegetation, the project site would not be visible to travelers on Pacific Coast Highway. Although the proposed project includes replacement of the aboveground air gap structure, the replacement would be in-kind, is directly adjacent to an existing taller building, and is not visible from the highway. Furthermore, there are no trees, historic buildings, rock outcroppings, or other scenic resources on the project site. Therefore, the proposed project would not result in damage to existing scenic resources within a highway officially designated as a State scenic highway. 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.

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. 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 an RO concentrate bypass pipeline and associated improvements including a back flow device, outfall connection and vault, and air gap structure improvements for the reverse osmosis brine line at the District's GRF. The proposed project also includes the scaling and cleaning of the existing air gap structure and 18-inch brine waste line. The project site is fully developed and has previously undergone substantial surficial

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 September 1, 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 September 1, 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 September 1, 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 September 1, 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 September 1, 2026).

and subsurface disturbance. The areas immediately surrounding the project site are also primarily developed. All excavation and land disturbance activities would occur within sediments that have been previously disturbed during construction of the existing GRF and associated utility lines and roadway. 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. Prior excavations to construct the GRF and associated utility lines and roadway did not result in the identification of subsurface archaeological deposits. Therefore, there are no known historical resources as defined by CEQA that would be impacted by the proposed project. Should an archaeological artifact or feature be unexpectedly discovered during project construction, implementation of **Regulatory Compliance Measure (RCM) CUL-1** would ensure that the proposed project would not cause a substantial adverse change in the significance of a historical resource should any resources be inadvertently discovered during project implementation.

RCM CUL-1

Unanticipated Discovery. Should an archaeological artifact or feature be discovered on site during project construction, all activities within a 50-foot radius of the find would be halted until the findings can be fully investigated by a qualified archaeologist to evaluate the find and assess the significance of the find according to the CEQA definition of a historical or unique archaeological resource. If the deposit is determined to be significant, the project sponsor and the qualified archaeologist shall meet to determine the appropriate avoidance measures or other appropriate measure, subject to approval by the City of Dana Point, which shall assure implementation of appropriate measures recommended by the archaeologist. Should archaeologically significant materials be recovered, the qualified archaeologist shall recommend appropriate analysis and treatment and shall prepare a report on the findings for submittal to the South Central Coastal Information Center.

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 15302. 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
Figure 2: Project Site

ATTACHMENT A

FIGURE 1

FIGURE 2

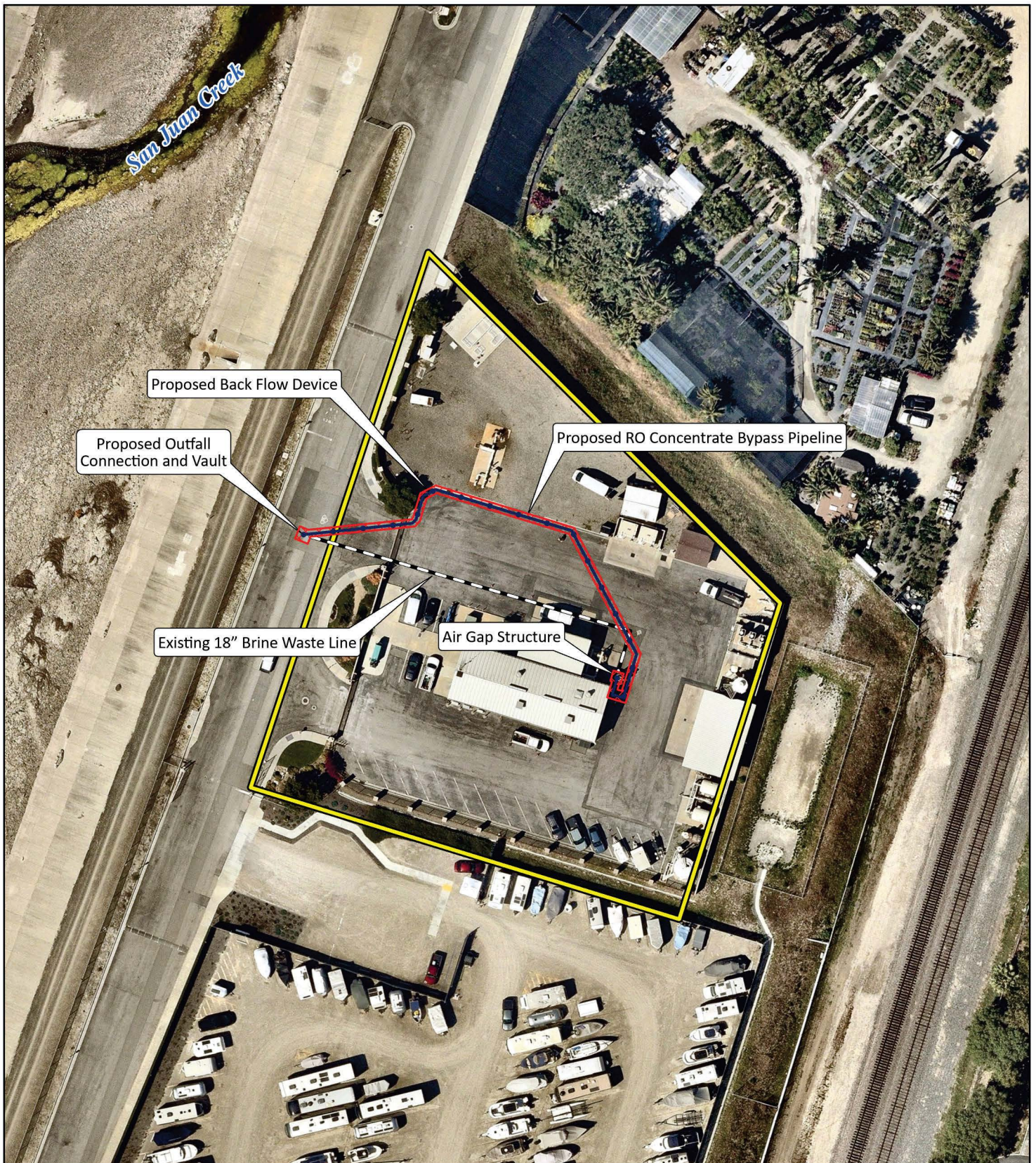


FIGURE 2

LSA



0 37.5 75
FEET

- Project Site
- Excavation Area for Proposed RO Concentrate Bypass Pipeline
- Proposed RO Concentrate Bypass Pipeline
- Existing 18" Brine Waste Line

Groundwater Recovery Facility Brine Line Improvement Project
Project Site

SOURCE: Nearmap (4/8/2026)

I:\2023\20230929.09\GIS\Pro\Groundwater Recovery Facility Brine Line Improvement Project\Groundwater Recovery Facility Brine Line Improvement Project.aprx (Fig 2 - Project Site)
9/9/2026 9:12 AM