ATTACHMENT 2

CEQA Categorical Exemption Memorandum
and
Notice of Exemption filed 10/8/2022

2022 CEQA Transmittal Memorandum

County of Santa Barbara - Clerk of the Board of Supervisors

105 E. Anapamu St. Room 407 • Santa Barbara • CA • 93101

(805) 568-2240

Complete this form when filing a Negative Declaration, Mitigated Negative Declaration, Environmental Impact Report or Notice of Exemption.

You will need to submit one original for posting plus one copy for the Department of Fish & Wildlife. A scanned copy including the date/time of posting will be emailed to the Lead Agency and Project Applicant. If you would like a return copy, please submit an extra copy along with a pre-addressed, stamped envelope.

Contact Person		Phone	
Nicholas Kunstek		805-881-1990	
Lead Agency		**Lead Agency Email**	
Montecito Groundwater Sustainability Agency		nkunstek@montecitogsa.com	
Project Title			
Groundwater Monitoring Well Construction			
Project Applicant	**Email**	**Phone**	
SAME			
Project Applicant Address	**City**	**State**	**Zip**
583 SAN YSIDRO RD	SANTA BARBARA	CA	93108

DOCUMENT BEING FILED:

☐ Environmental Impact Report (EIR) .....

☐ 2022 Filing Fee $3,539.25

☐ Previously Paid **(must attach receipt)** $0.00

☐ No Effect Determination **(must be attached)** $0.00

☐ Negative Declaration or Mitigated Negative Declaration .....

☐ 2022 Filing Fee $2,548.00

☐ Previously Paid **(must attach receipt)** $0.00

☐ No Effect Determination **(must be attached)** $0.00

☒ Notice of Exemption $0.00

☒ County Administrative Handling Fee **(required for all filings, effective 7/19/18)** $50.00

Category D
Task 8

TOTAL: $ 50.00

PAYMENT METHOD: ALL APPLICABLE FEES MUST BE PAID AT THE TIME OF FILING

☐ Cash ☐ Credit Card (in person only) ☒ Check # 008432 ☐ Journal Entry # _____

Print Form

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

County Clerk
County of: Santa Barbara
105 E. Anapamu St, Room 407
Santa Barbara, CA 93101

From: (Public Agency): Montecito Groundwater Sustainability Agency
583 San Ysidro Road
Santa Barbara, CA 93108
(Address)

Project Title: Groundwater Monitoring Well Construction Project

Project Applicant: Montecito Groundwater Sustainability Agency

Project Location - Specific:
910 Channel Drive, SB, CA 93108 & Manning Park, 449 San Ysidro Road, SB, CA 93108

Project Location - City: N/A Project Location - County: Santa Barbara

Description of Nature, Purpose and Beneficiaries of Project:
The project will drill two groundwater monitoring wells and three observation wells to provide geologic and groundwater level data for the Montecito Groundwater Basin.

Name of Public Agency Approving Project: Montecito Groundwater Sustainability Agency

Name of Person or Agency Carrying Out Project: Nicholas Kunstek, Groundwater Specialist

Exempt Status: **(check one):**

- ☐ Ministerial (Sec. 21080(b)(1); 15268);
- ☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));
- ☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- ☒ Categorical Exemption. State type and section number: 15303, 15304, and 15306
- ☐ Statutory Exemptions. State code number: _____

Reasons why project is exempt:
See Attached Memorandum

Lead Agency
Contact Person: Nicholas Kunstek Area Code/Telephone/Extension: 805-969-2271

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: _____ Date: 10/8/2022 Title: Groundwater Specialist

▪ Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____

Revised 2011

8432
10/17/2022

VENDOR: 0817 COUNTY OF SANTA BARBARA

DATE	INVOICE #	DESCRIPTION	GL #	AMOUNT
10/17/2022	10.17.2022	GROUNDWATER WELL MONITOR CONSTRUCTION PJCT	02-56901-514	50.00

CHECK TOTAL 50.00

PLEASE DETACH AND RETAIN FOR YOUR RECORDS

MONTECITO WATER DISTRICT
583 SAN YSIDRO ROAD
SANTA BARBARA, CA 93108-2124
TELEPHONE (805) 969-2271

AMERICAN RIVIERA BANK
1033 Anacapa Street
Santa Barbara, CA 93101
90-4433/1222

PAY ---Fifty Dollars and 00/100 Cents---

No. 008432

DATE	CHECK NUMBER	NET AMOUNT
10/17/2022	8432	$50.00

VOID AFTER ONE YEAR

TO THE ORDER OF
COUNTY OF SANTA BARBARA
CLERK OF THE BOARD OF SUPERVISORS
105 E ANAPAMU ST, ROOM 407
SANTA BARBARA, CA 93101

AUTHORIZED SIGNATURES

⑈008432⑈ ⑆122244333⑆ 02000173⑧⑈

Print Form

Notice of Exemption

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Lead Agency
Contact Person: Nicholas Kunstek Area Code/Telephone/Extension: 805-969-2271

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1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: _____ Date: _____ Title: _____

- Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____

Rincon Consultants, Inc.

209 East Victoria Street
Santa Barbara, California 93101

805 319 4092

info@rinconconsultants.com
www.rinconconsultants.com

September 21, 2022
Project No: 21-12232

Adam Kanold, P.E.
Asst. General Manager/Engineering Manager
Montecito Water District
583 San Ysidro Road
Santa Barbara, California 93108

Subject: CEQA Categorical Exemption Memorandum for the Montecito Groundwater Sustainability Agency Monitoring and Observation Wells Project

This memorandum provides an analysis to support the determination by the Montecito Groundwater Sustainability Agency that the proposed Groundwater Monitoring Well Development Project is exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15303, 15304, and 15306 of Title 14 of the California Code of Regulations.

Project Location

The project would be located on three separate sites: the coastal monitoring well would be located on a 6.29-acre parcel at the Montecito Sanitary District property located at 910 Channel Drive in Montecito (Assessor's Parcel Number [APN] 009-282-001); the inland monitoring well and two observation wells would be located on a 4.76-acre parcel at lower Manning Park off of Santa Rosa Lane in Montecito (APN 007-220-001); and one additional observation well would be located on a 0.78-acre parcel at upper Manning Park located at 449 San Ysidro Road, Montecito (APN 009-060-050).

The Sanitary District site is zoned PU (Public Utilities) and is developed with a mix of administrative buildings and wastewater processing infrastructure. The well location on this site is proposed for the southwest corner of the property, which is undeveloped and previously disturbed by cut and fill operations during prior site development (Figure 1).

The lower Manning Park site is a County-owned public park. The monitoring and observation well sites would be located in an existing paved parking lot approximately 50 feet east of Oak Creek, which flows between San Ysidro Road and the parcel's western parcel boundary. The upper Manning Park site is also a County-owned public park. The observation well site on this parcel would also be located in an existing paved parking lot in the extreme northeast corner of the parcel (Figure 2).

Figure 1 Sanitary District Site Location

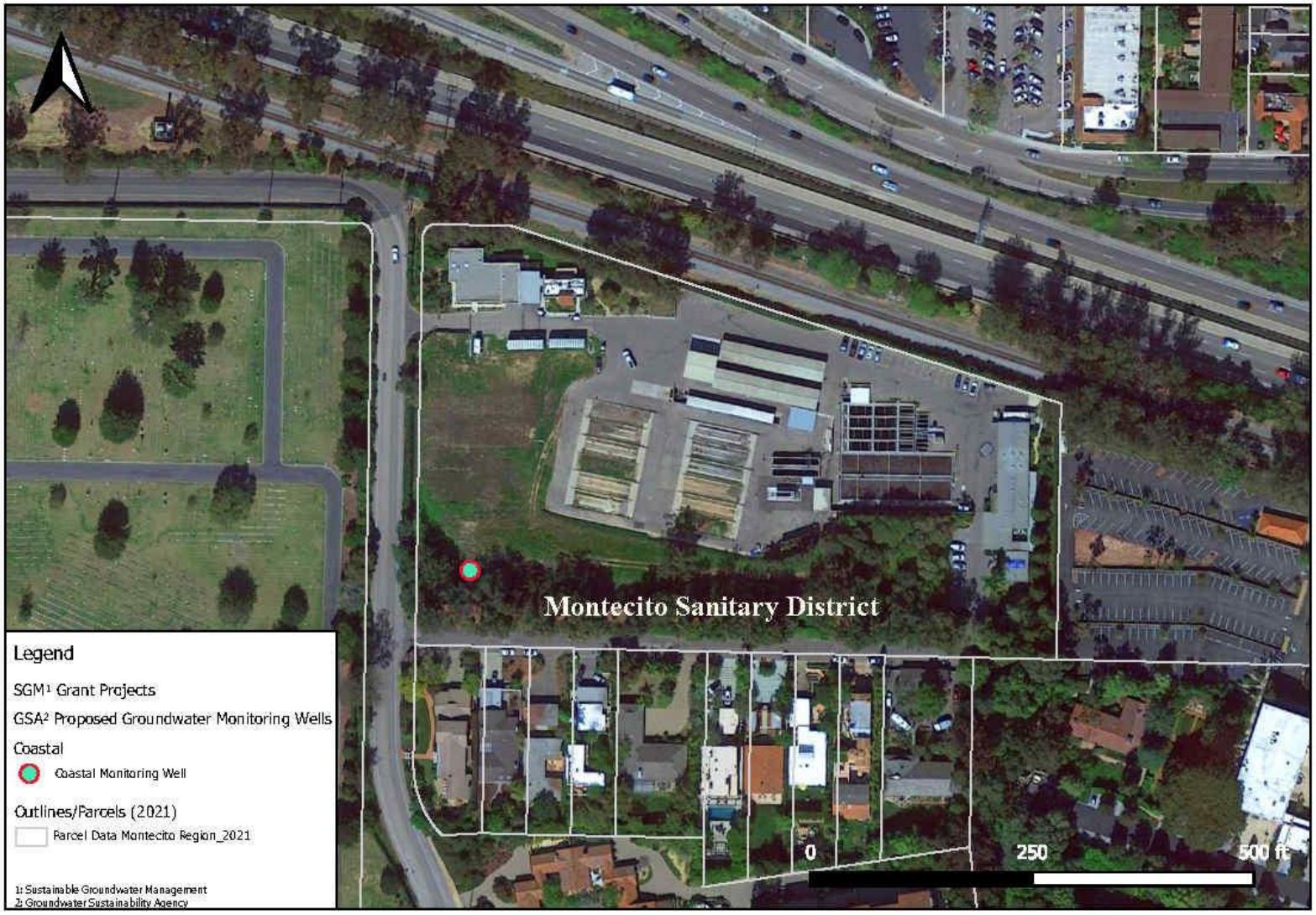
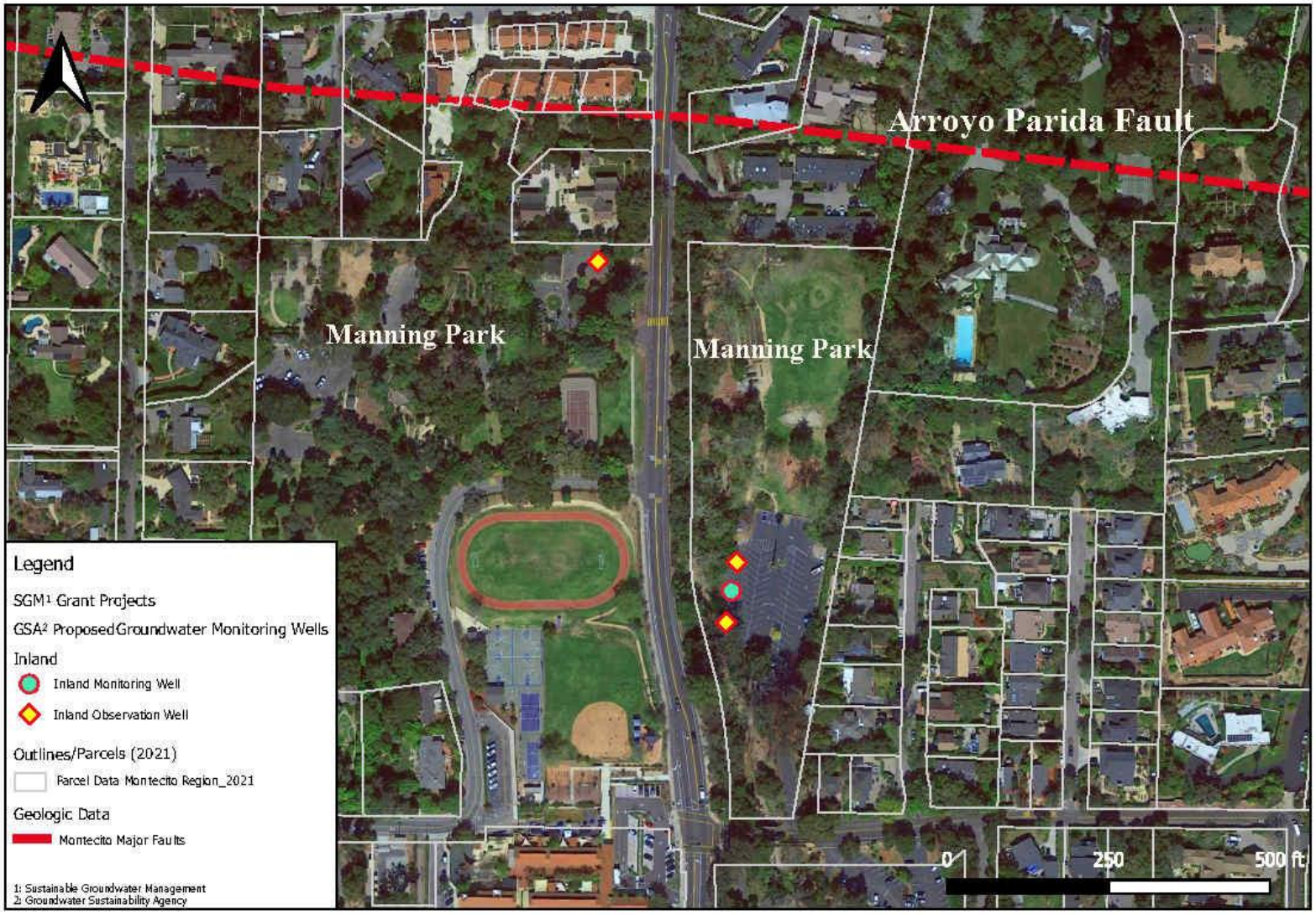


Figure 2 Manning Park Site Location



Project Background

The Montecito Groundwater Sustainability Agency (MGSA) was formed in 2018 for the purpose of managing the Montecito Groundwater Basin (Basin) as defined by the Sustainable Groundwater Management Act (SGMA).

In May of 2020, the MGSA was awarded funds from the California Department of Water Resources through the Sustainable Groundwater Management Grant to conduct several projects to assist with the development of the MGSA's Groundwater Sustainability Plan. As a coastal basin with historically unregulated groundwater extraction, there is the potential for the Basin to experience several undesirable results, as defined by SGMA, including chronic lowering of groundwater levels, degradation of water quality, and seawater intrusion.

One of the grant-funded projects is the development of a groundwater monitoring well network. The purpose of the monitoring network is to provide data for incorporation into existing and future numerical models of the Basin. The purpose of the monitoring wells is to provide data to access groundwater conditions over time and also inform numerical model simulations for management support. In coastal groundwater monitoring wells, an additional purpose is to monitor for seawater intrusion. Coastal wells in the network will be used to assess existing and potential seawater intrusion risk. The MGSA has a network of pre-existing groundwater wells throughout the Basin and seeks to construct additional purpose-built coastal and inland monitoring wells to fill data gaps and augment the existing monitoring well network.

Project Description

The proposed project involves the drilling of two groundwater monitoring wells and three observation wells by the MGSA. The wells will be designed to comply with California Department of Water Resources Bulletin 74-90 Combined Water Well Standards. The monitoring wells consist of approximately 16-inch diameter boreholes; the coastal well borehole will be advanced up to a maximum depth of 1,000 feet below ground surface (bgs) and the inland Manning Park monitoring well will be completed to a maximum depth of approximately 300 feet bgs. Observation wells at Manning Park will be completed in smaller diameter boreholes advanced up to 300 feet bgs. Installation of the monitoring and observation wells would not result in water extraction and will be completed at ground level (only minor amounts of groundwater would be produced during drilling and data sampling). Total associated grading for each bore will be a maximum of 30 to 40 cubic yards depending on the final depth of the wells. No native trees or vegetation will be removed at any of the well locations.

The project includes the following specific details:

- **Site Preparation.** Well pads located on unimproved surfaces would be scraped to produce a flat work area. At paved locations, existing asphalt would be cut and temporarily removed. Material may be stockpiled or formed into berms to route stormwater runoff and contain drilling fluid and cuttings. At the deeper coastal monitoring well, an auger rig drills and installs a large-diameter conductor casing to 50 or more feet below ground surface (bgs) and a cement seal would be installed to provide borehole stability and to prevent downward migration of surface water into the underlying aquifer. Cement sanitary seals would be installed upon completion of the inland Manning Park wells.

- **Mobilization**. A drill rig and supporting equipment would be mobilized to the site. The drill rig would be positioned over the well location and supported on hydraulic jacks. Supporting equipment would be positioned near the drill rig and a receiving area for cuttings would be prepared. Temporary crew shade and sanitary facilities would be positioned on site, as necessary.
- **Observation and Monitoring Wells.** Exploratory boreholes would be drilled for each well to bedrock or a depth of up to 1,000 feet bgs (coastal well) or 300 feet bgs (Manning Park wells) if bedrock is not encountered.
  The coastal well borehole would be backfilled to approximately 500 feet bgs and completed with up to three 2-inch casings. The borehole would be advanced via mud rotary methods. The inland wells boreholes will be advanced via sonic methods.
  A temporary work area of approximately 20,000 square feet would be required at each location. The wells will be completed with an at-grade vehicle-rated sealed vault, resulting in no permanent above ground footprint.
- **Testing and Data Acquisition.** During construction, short-term zonal pumping tests would be conducted at the coastal well via installation of a temporary casing within the borehole using tooling on the drill rig to assess water quality at depth. After construction, sampling from the 2-inch-casings would be conducted periodically with small temporary submersible pumps deployed manually from a standard work truck and powered by battery or small portable generator. The minor amounts of test water produced during drilling and data sampling would be either trucked off site for disposal, disposed of at the site, or, if desirable, may be utilized to irrigate landscaping on the site.
- **Demobilization and Test Pump Installation.** The drill rig and supporting equipment would be demobilized from the well pad and the wellhead is finished with an at-grade vault. At the Manning Park monitoring well, an appropriately-sized temporary submersible test pump would be installed and utilized to perform a pumping test of up to 72-hours duration to estimate aquifer parameters.

Project Design Features

The following project design features would be incorporated into the project.

a. Prior to project mobilization, all limits of construction work adjacent to Oak Creek will be clearly delineated with orange construction fencing or similar highly visible material and maintained throughout the duration of construction.
b. Off-site tracking of loose construction and landscape materials will be prevented by implementing street sweeping, vacuuming, and rumble plates, as appropriate.
c. Site washout areas will be at least 100 feet from a storm drain, open ditch, or surface water and prevent runoff flows from such activities from entering receiving water bodies.
d. All vehicles and equipment will be in good working condition and free of leaks. The contractor will prevent oil, petroleum products, or any other pollutants from contaminating the soil or entering a watercourse (dry or otherwise). When vehicles or equipment are stationary, mats or drip pans will be placed below vehicles to contain fluid leaks.
e. Fugitive dust from ground disturbance activities will be minimized using water trucks and covering of soil stockpiles.
f. A speed limit of 15 mph for construction vehicles will be implemented on unpaved non-public roads.
g. All food related trash will be disposed of in closed containers and removed from the project site each day during the construction period. Construction personnel will not feed or otherwise attract

wildlife to the construction area. At project completion, all project-generated debris, vehicles, building materials, and rubbish will be removed from the project site.

Exemption Analysis

Suitability of Use of Categorical Exemption

The project qualifies for a Categorical Exemption (CE) under CEQA. Public Resources Code Section 21084 requires the *CEQA Guidelines* to include a list of classes of projects determined not to have a significant effect on the environment and which are, therefore, exempt from CEQA (see Chapter 19 Sections 15301 through 15333 of the *CEQA Guidelines*). Categorically Exempt projects under CEQA fall into several distinct categories; Classes 3, 4 and 6 apply to the proposed project.

Section 15303 – New Construction or Conversion of Small Structures: Class 3 projects consist of construction and location of a 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 include the construction and operation of two monitoring wells and three observation wells. Once completed, no above ground structures would be associated with the wells and would be consistent with existing features at the project sites. Therefore, the Class 3 exemption is applicable.

Section 15304 – Minor Alterations to Land: Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes.

The installation of the monitoring and observation wells would involve drilling 10- to 12-inch boreholes which would be located either in existing paved parking lots or in a previously graded and disturbed area adjacent to a wastewater treatment facility. None of the wells would require removal of any trees or vegetation. Once completed, no above ground structures will be associated with any of the wells. Therefore, the Class 4 exemption is applicable.

Section 15306 – Information Collection: Class 6 consists of 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 project consists of the installation of monitoring and observation wells to observe changes in the level and quality of groundwater within the Basin pursuant to grant funding to implement the MGSA Groundwater Sustainability Plan. The project will not result in a serious or major disturbance to an environmental resource. Therefore, the Class 6 exemption is applicable.

Discussion of CEQA Guidelines 15300.2 Exceptions

The applicability of all CEs is qualified by the exceptions listed in *CEQA Guidelines* Section 15300.2(a) through (f). In the discussion below, each exception (in *italics*) is followed by an explanation of why the exception would not apply to the 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.*

Manning Park Sites

No critical habitat for federally or state listed species is located within the project site. No special status species have been documented within the project site per the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB). Suitable habitat for California red-legged frog (*Rana draytonii*) is not present within the well sites. Suitable breeding habitat (11 to 20 weeks of continuous ponding for larval development) is not likely present in Oak Creek, which is categorized as R4SBCx (Riverine Intermittent, Stream Bed, Seasonally Flooded, Excavated) according to the National Wetland Inventory. Suitable upland habitat (dense shrubby riparian vegetation) is also not present in the creek. The nearest CNDDB occurrence was recorded 0.8-mile northwest of the Manning Park site, is historical (2005) and is separated from the site by dense urban development. The species has a low potential to occur in Oak Creek. The project involves short term, low impact construction activities in a developed parking lot, would result in a small diameter capped well hole, and would adhere to the project design features incorporated into the project.

A CDFW California Essential Habitat Connectivity small natural area is mapped directly west of the Manning Park parking lot, likely associated with Oak Creek and surrounding native woodlands. This area would not be directly or indirectly affected by the project, as the project involves short term, low impact construction activities in a developed parking lot. Implementation of project design features would avoid impacts to Oak Creek.

Sanitary District Site

No critical habitat for federally or listed species is located within the project site. No potentially jurisdictional waters are located on or adjacent to the project site. No special status species are documented within the project site per the CNDDB. The project site comprises disturbed (sparse, ruderal non-native herbaceous plant species and grasses) land cover The site is not suitable for special status plant or animal species.

Consequently, the project is not located in an area where there is an environmental resource of hazardous or critical concern which is designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies and this exception to a CE does not apply.

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 project would not result in significant environmental impacts, and there are no other successive projects of the same type or scale planned by MGSA. There are no major reasonably foreseeable future projects in the area that would result in significant cumulative impacts in combination with the proposed project. Therefore, no significant cumulative impacts would result from successive projects 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 the construction and operation of groundwater monitoring and observation wells is not considered unusual because: (1) the project sites are either paved or previously disturbed and the wells, once completed, would not include any above ground structures and therefore would be consistent with the existing use of each site; and (2) the proposed project would not result in the production of any groundwater and would enable MGSA to monitor groundwater quality within the Basin. Therefore, no unusual circumstances exist.

Since it has been established the proposed project and sites are not unusual, an assessment of environmental effects is not strictly required. Nevertheless, each of the wells is located in areas previously disturbed due to construction of parking lots and site grading. Project ground disturbance associated with the wells would occur primarily within previously disturbed sediments (i.e., artificial fill). Implementation of the identified Project Design Features would further reduce the project's already minimal effects on the environment. Therefore, this exception to a CE does not apply.

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.*

The nearest officially designated scenic highway to the project sites is SR 154, located approximately 8 miles to the west.[1] Due to distance and intervening structures and natural features, the project sites are not visible from State Route 154. 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.*

According to a search of the Department of Toxic Substances Control EnviroStor database and the California State Water Resources Control Board GeoTracker database, the project site is not on or within 0.25 mile of a hazardous waste site. [2,3] Therefore, this exception to a CE does not apply to the proposed 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.*

[1] California Department of Transportation. 2018. California State Scenic Highway System Map. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed April 2022).
[2] California Department of Toxic Substances Control. 2022. EnviroStor database. https://www.envirostor.dtsc.ca.gov/public/map/?global_id=60002757 (accessed April 2022).
[3] State Water Resources Control Board. 2021. GeoTracker database. https://geotracker.waterboards.ca.gov/map/?global_id=SL0605324229 (accessed May 2022).

Sanitary District Site

A prior records search from 2016 for a nearby project indicates there are no sites at the proposed well location. However, there is a large site approximately 250 feet to the west, located within the Santa Barbara Cemetery. The proposed well location has been previously disturbed during grading associated with construction of the existing sanitation facility and during routine vegetation maintenance. Due to the limited ground disturbances associated with the project, including minor grading to prepare the site for well construction and drilling of one well, combined with the previous ground disturbances at the proposed well location, the potential for the project to cause a substantial adverse change in the significance of a historical resource is low.

Manning Park Sites

The wells would be located in an existing paved parking lot which has been previously disturbed by grading and site development. Based on the limited ground disturbances associated with grading to prepare site for drilling and the drilling four, 10-inch diameter wells, the potential for the project to cause a substantial adverse change in the significance of a historical resource is low.

Consequently, the project would not cause a substantial adverse change in the significance of a historical resource and this exception to a CE does not apply.

Determination

Based on this analysis, the proposed project meets the qualifications of the Classes 3, 4 and 6 CEs in Chapter 19 Sections 15301 through 15333 of the *CEQA Guidelines* and is exempt from CEQA pursuant to the *CEQA Guidelines* Section 15300.

Sincerely,
Rincon Consultants, Inc.

Chris Price
Senior Supervising Planner