



# Bonita Elementary School Drinking Water Improvements Project

## Responses to Comments on the Draft Initial Study-Mitigated Negative Declaration

*prepared by*

**Santa Maria-Bonita School District**

708 South Miller Street

Santa Maria, California 93454

Contact: Javier Cavazos, Coordinator of Maintenance,  
Operations, Facilities, Transportation

*prepared with the assistance of*

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April 2024



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# Responses to Comments on the Draft IS-MND

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This section includes comments received during the circulation of the Draft Initial Study-Mitigated Negative Declaration prepared for the Bonita Elementary School Drinking Water Improvements Project (project).

The Draft IS-MND was circulated for a 30-day public review period that began on January 26, 2024, and ended on February 26, 2024. The Santa Maria-Bonita School District (District) received two comment letters on the Draft IS-MND. The commenters and the page number on which each commenter’s letter appear are listed below.

Letter No. and Commenter	Page No.
1 Lori Schmitz, Environmental Scientist, State Water Resources Control Board	2
2 Shelby Fredrick, Development Review Coordinator, California Department of Transportation District 5	9

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1). Any changes made to the text of the IS-MND in response to comments are shown in ~~strikeout~~/underline format.



Letter 1



State Water Resources Control Board

Mr. Javier Cavazos
San Maria-Bonita School District
708 South Miller Street
Santa Maria, California 93454

Dear Mr. Cavazos:

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION (IS/MND) FOR SANTA MARIA-BONITA SCHOOL DISTRICT (DISTRICT); BONITA SCHOOL DRINKING WATER IMPROVEMENTS PROJECT (PROJECT); COUNTY; STATE CLEARINGHOUSE NO. 2024010761

We understand that the District is pursuing Drinking Water State Revolving Fund (DWSRF) financing for this Project. As a funding agency and a state agency with jurisdiction by law to preserve, enhance, and restore the quality of California's water resources, the State Water Resources Control Board (State Water Board) is providing the following water quality comments on the IS/MND circulating for the Project.

The State Water Board, Division of Financial Assistance, is responsible for administering the DWSRF Program (Program). The primary purpose for the Program is to implement the Safe Drinking Water Act and various state laws by providing financial assistance for drinking facilities improvements to provide clean potable drinking water, and thereby protect and promote health, safety and welfare of the inhabitants of the state.

All applicants seeking funding must comply with the California Environmental Quality Act (CEQA) and provide appropriate documents to the State Water Board so that it can fulfill its CEQA responsibilities, see CEQA Requirements. For additional Program information, the complete environmental application package and instructions, please visit: Drinking Water State Revolving Fund Forms and Instructions.

Following are specific comments on the District's draft IS/MND:

- 1. The District will receive water from the City's water system through a metered connection. The Project cannot repurpose the District's existing wells for drinking water, if the water source is regulated under the City's water system (PDF page 8). Please remove mention of the wells being repurposed or explain how they will be repurposed as part of a non-potable water system.
2. Please indicate if a temporary source of water will be needed between the time when the District's private system will be disconnected from the District wells (and the new hydropneumatic tank is installed) and the time when the District's

E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

- system will be connected to the City’s water source. If an interim source of water needed, please discuss how it will be provided. | 3 (cont.)
- 3. Please discuss discharges regarding the preparation of the infrastructure for use. How will flushing of the new hydropneumatic tank and new water lines be handled? (Please note that if the discharge is a discharge to land with a low threat to water quality the discharge may fall under the State Water Resources Control Board Water Quality Order No 2003-0003-DWQ.) | 4
- 4. The IS/MND indicates that because the project disturbance area would be less than one acre in size the Project would not be subject to the requirements of the NPDES Construction General Permit (PDF page 41), however the submitted technical specifications of the Project included template language requirements for the contractor to obtain the NPDES Construction General permit. Please clarify in the IS/MND if a permit will be obtained and a Stormwater Pollution Prevention Plan will be developed for this Project or if the technical specifications language will not be needed. | 5
- 5. The IS/MND indicates periodic maintenance to the system will occur like exercising isolation valves and blowoffs, recoating of tanks to prevent corrosion, and monitoring of water quality, and flushing of the pipelines (PDF page 9). The IS/MND indicated no new city or school employees would be required to operate the project (PDF Page 9). Please discuss if employees who currently maintain the Bonita School public water system will continue to maintain and monitor the private system or clarify the position that will cover such maintenance. | 6
- 6. Please discuss how the lead-based piping in the school’s Building K will be disposed of to protect water quality. | 7

Thank you for the opportunity to review the District’s draft IS/MND. If you have any questions or concerns, please feel free to contact me at (916) 449-5285, or by email at [Lori.Schmitz@waterboards.ca.gov](mailto:Lori.Schmitz@waterboards.ca.gov) or contact Mrs. Bridget Binning at (916) 449-5641, or by email at [Bridget.Binning@waterboards.ca.gov](mailto:Bridget.Binning@waterboards.ca.gov). | 8

Sincerely,

 Digitally signed by Lori Schmitz  
Date: 2024.02.22 10:43:52  
Water Boards

Lori Schmitz  
Environmental Scientist  
Division of Financial Assistance  
Special Project Review Unit  
1001 I Street, 16<sup>th</sup> floor  
Sacramento, CA 95814

cc: State Clearinghouse

Bridget Binning, Division of Financial Assistance

Joel Greathouse, Division of Financial Assistance

## Letter 1

**COMMENTER:** Lori Schmitz, Environmental Scientist, Division of Financial Assistance, Special Project Review Unit, State Water Resources Control Board (SWRCB)

**DATE:** February 22, 2024

### **Response 1.1**

The commenter acknowledges the District's pursuit of Drinking Water State Revolving Fund (DWSRF) financing for the project and outlines SWRCB's regulatory role and relationship to the project. The commenter provides an overview of the CEQA requirements of the DWSRF program and indicates they reviewed the Draft IS-MND.

This comment is noted.

### **Response 1.2**

The commenter requests clarification on how the District's existing wells will be repurposed.

The existing on-site 10,000-gallon storage tank and wells would be repurposed solely for non-potable use, specifically fire suppression and irrigation purposes, and they will not be part of the potable water system at Bonita Elementary School. This clarification would extend to the existing non-pressurized tank. Any mention of repurposing the wells for drinking water should be understood within the context of their dedicated use for non-potable purposes, ensuring transparency and alignment with the project's intended functions.

In response to this comment, the following text under *Description of Project* on page 4 of the Draft IS-MND has been clarified:

#### **Project Description**

The proposed project consists of the connection of the City's water system to Bonita Elementary School via approximately 8,100 linear feet of a two-inch diameter service line from the planned terminus of the City's water system near the northeast corner of the WWTP to Bonita Elementary School. (The City is currently in the design phase of extending City water service to the WWTP separately from the proposed project.) To meet peak demand, fire flow requirements, and irrigation demand, the project would also include repurposing the existing on-site 10,000-gallon storage tank and wells for non-potable use (i.e., irrigation and fire suppression) and potentially adding a hydropneumatic tank (up to approximately 1,000 gallons in capacity) with appurtenances such as an air compressor and additional above-grade piping and isolation valves.

### **Response 1.3**

The commenter requests additional information on whether a temporary source of water will be needed between the time when the school's water system is disconnected from the existing wells and the time when the school's water system is connected to the City of Santa Maria's water system.

Due to water quality concerns, the District does not currently use its existing wells at Bonita Elementary School to supply potable water. Instead, the District provides bottled water to the school's students and faculty. The District would continue to provide bottled water as a temporary water source until the school's water system is connected to the City of Santa Maria's water system.

### **Response 1.4**

The comment requests additional information on how the discharge generated by flushing the new water lines and the potential new hydropneumatic water tank would be handled.

Water produced by flushing of the proposed pipeline and potential hydropneumatic tank would be placed in the on-site storage tank and re-used for non-potable irrigation and fire suppression purposes. The District would comply with the applicable requirements of Order R3-2019-0089 (General Waiver for Specific Types of Discharges), issued by the Central Coast Regional Water Quality Control Board. Order R3-2019-0089 provides a general waiver of waste discharge requirements for specific types of discharges, including "water supply discharges from pipelines, storage tanks, pump tests, and well development." Specific standards to which the District would be required to adhere are outlined in Section A4 in Attachment A to Order R3-2019-0089. These standards include implementing appropriate management practices to dissipate energy, prevent erosion, and preclude discharge to surface waters or conveyances that are subject to federal Clean Water Act requirements as well as assuring chlorine and bromine concentrations in the water would not impact groundwater quality.

In response to this comment, the following text has been added under "Construction" in *Description of Project* in the IS-MND:

#### **Construction**

[...]

Water produced by flushing of the proposed pipeline and potential hydropneumatic tank would be placed in the on-site storage tank and re-used for non-potable irrigation and fire suppression purposes. With regard to this discharge, the District would comply with the applicable requirements of Order R3-2019-0089 (General Waiver for Specific Types of Discharges), issued by the Central Coast Regional Water Quality Control Board.

In addition, the following text has been added under threshold (a) in Section 10, *Hydrology and Water Quality*, of the IS-MND:

#### **Construction**

[...]

Water produced by flushing of the proposed pipeline and potential hydropneumatic tank would be placed in the on-site storage tank and re-used for non-potable irrigation and fire suppression purposes. The District would comply with the applicable requirements of Order R3-2019-0089 (General Waiver for Specific Types of Discharges), issued by the Central Coast Regional Water Quality Control Board. Order R3-2019-0089 provides a general waiver of waste discharge requirements for specific types of discharges, including "water supply discharges from pipelines, storage tanks, pump tests, and well development." Specific standards to which the District would be required to adhere are outlined in Section A4 in

Attachment A to Order R3-2019-0089. These standards include implementing appropriate management practices to dissipate energy, prevent erosion, and preclude discharge to surface waters or conveyances that are subject to federal Clean Water Act requirements as well as assuring chlorine and bromine concentrations in the water would not impact groundwater quality. With adherence to these regulatory requirements, the discharge of water produced by pipeline and tank flushing during construction would not result in substantial degradation of surface water or groundwater quality.

### **Response 1.5**

The commenter requests clarification on whether the proposed project would be subject to the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit due to a potential discrepancy between the Draft IS-MND and the technical specifications submitted to SWRCB for the project.

Section 7, *Geology and Soils*, of the Draft IS-MND correctly characterizes that the project would not be subject to compliance with the NPDES Construction General Permit requirements because the project disturbance area would be less than one acre in size. Prior to its next submittal to SWRCB, the project design team will update the project's technical specifications to remove mention of the NPDES Construction General Permit.

### **Response 1.6**

The commenter requests clarification regarding the employees who will be responsible for conducting operation and maintenance activities for the proposed project.

Qualified staff employed by the City and District will be responsible for conducting operation and maintenance activities for the proposed project. As noted under *Description of Project* on page 5 of the Draft IS-MND, "The Bonita Elementary School's meter would be periodically inspected and calibrated as part of the City's meter maintenance program." In addition, the District has qualified staff who operate the existing on-site system and will continue to provide qualified staff to operate and maintain the new on-site water system facilities. The Draft IS-MND incorporates the assumption that there will be no net increase in City and District staff to operate and maintain the proposed facilities, stating under *Description of Project* on page 5 that "no new City or school employees would be required to operate the project." Therefore, no revisions to the Draft IS-MND are necessary.

### **Response 1.7**

The commenter requests clarification of how the lead-based piping in Building K will be disposed of to protect water quality.

As noted under *Description of Project* on page 5 of the Draft IS-MND, "the project would involve replacing lead service lines in the school's Building K." The project contractor would be responsible for handling the lead service lines from Building K in accordance with all applicable federal, state, and local regulations for lead-based materials and disposing of the pipelines at a licensed hazardous waste disposal facility. In particular, the project contractor would be required to comply with California Occupational Safety and Health Administration (CalOSHA) regulations, specifically California Code of Regulations Section 1532.1, which requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed CalOSHA standards.



In response to this comment, the following text has been added under threshold (a) in Section 9, *Hazards and Hazardous Materials*, of the IS-MND:

Project construction would involve the use of potentially hazardous materials such as vehicle fuels and fluids. These materials would be contained within vessels specifically engineered for safe storage and would not be transported, stored, or used in quantities that would pose a significant hazard to the public or construction workers themselves. In addition, any use of potentially hazardous materials during construction of the proposed project would be required to comply with all local, state, and federal regulations regarding the handling of hazardous materials, which would minimize the potential for the project to create a significant hazard to the public or the environment. In addition, lead-based materials exposure is regulated by California Occupational Safety and Health Administration (CalOSHA) regulations. In particular, during removal of existing lead service lines from Building K, the District's contractor would be required to comply with California Code of Regulations, Section 1532.1, which requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed CalOSHA standards.

In addition, the following text has been added under thresholds (d) and (e) in Section 19, *Utilities and Service Systems*, of the IS-MND:

Construction of the project would result in a temporary increase in solid waste because approximately 4,500 cubic yards of soil would be exported from the site. The soil would be disposed of in accordance with all applicable federal, state, and local statutes and regulations. All on-site existing infrastructure would be repurposed, so demolition activities and resultant waste material would be minor. The soil and waste would be disposed of at a nearby landfill, such as the Santa Maria Regional Landfill. This landfill has a remaining capacity of 1,477,580 cubic yards as of 2023 (California Department of Resources Recycling and Recovery 2023). Due to the temporary nature of construction and minimal amount of construction waste anticipated to require disposal, the project would not generate quantities of solid waste that would account for a substantial percentage of the remaining total daily regional permitted capacity available at the Santa Maria Regional Landfill. In addition, the existing lead service lines removed from Building K would be disposed of at a licensed hazardous waste disposal facility. Following construction activities, project operation would not generate long-term waste. Therefore, the project would not generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals and would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

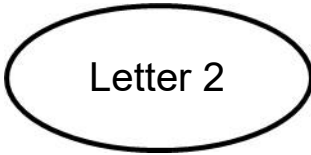
## **Response 1.8**

The commenter provides contact information.

This comment is noted.

# California Department of Transportation

CALTRANS DISTRICT 5  
50 HIGUERA STREET | SAN LUIS OBISPO, CA 93401-5415  
(805) 549-3101 | FAX (805) 549-3329 TTY 711  
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February 28, 2024

SCH# 2024010761  
SB SR166 PM3.68

Javier Cavazos  
Santa Maria-Bonita Unified School District  
Coordinator of Maintenance, Operations, Facilities, Transportation  
708 South Miller Street  
Santa Maria, CA 93454

## COMMENTS TO THE MITIGATED NEGATIVE DECLARATION (MND) FOR THE BONITA ELEMENTARY SCHOOL DRINKING WATER IMPROVEMENT PROJECT

Dear Javier Cavazos:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the IS/MND for the Bonita Elementary School Water Improvement Project in the City of Santa Maria. The project proposes to connect the City's water system to Bonita Elementary School via an approximately 8,100 linear foot and two-inch diameter service line running along State Route (SR) 166. Additionally, the project includes some infrastructure improvements to a classroom building on the site. Access to the project site during construction would be provided by SR166 and Black Rd. Increases in VMT from construction would be short-term, minimal, and temporary and would not increase after project build out. At this time, we offer the following comments in response to the IS/MND:

1

1. Caltrans supports development that is consistent with State and Federal planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local agencies to achieve a shared vision of how the transportation system can and should accommodate interregional and local travel and development. Caltrans believes that continued coordination with your agency is imperative to achieve overall network connectivity.

2

2. *Drainage and Hydraulics*  
Existing drainage structures need to be located and avoided. There are several longitudinal driveway culverts along Hwy 166, a double 42" RCP cross culvert at postmile 3.72 and a double 24" RCP crossing Black Road at Hwy 166. All culverts are at shallow depths. All existing drainage patterns need to be maintained.

3

3. *Encroachment Permits*

4

As discussed in the pre-application meeting on 12/12/2023 the proposed waterline should be installed outside the pavement of Route 166. It may be installed outside the paved area on either the eastbound or westbound side (or a combination of the two). Section 602.5B of the Encroachment Permit Manual (EPM) states that proposed longitudinal utilities must be installed as close to the State right of way line as possible. Section 603.3C states that all proposed underground utilities must be encased under any paved areas (if horizontal directional drilling is used, the HDPE may be used as encasement).

Any work within the State Right of Way will require an encroachment permit. Plans and profiles of the proposed work stamped and signed (including expiration date) by a CA registered civil engineer will be required. If Caltrans Standard Plans cannot be used for traffic control a stamped and signed Traffic Control Plan (TCP) will be required.

The encroachment permit application form, directions to complete the form, and plan requirements can be found at the following web address:  
<https://dot.ca.gov/programs/traffic-operations/ep/applications>. Electronic encroachment permit application packages submissions should be sent to [D5.Permits@dot.ca.gov](mailto:D5.Permits@dot.ca.gov). No permit fees are due during submission; Caltrans Accounting will invoice the responsible party for the permit fees (however, this proposed work would be fee exempt).

We look forward to continued coordination with the School District on this project. If you have any questions, or need further clarification on items discussed above, please contact me at [shelby.fredrick@dot.ca.gov](mailto:shelby.fredrick@dot.ca.gov) or 805-903-3395.

Sincerely,



Shelby Fredrick  
Development Review Coordinator  
Caltrans District 5, LDR South Branch

Cc: State Clearinghouse

4 (cont.)

5

## Letter 2

**COMMENTER:** Shelby Fredrick, Development Review Coordinator, Local Development Review South Branch, California Department of Transportation (Caltrans) District 5

**DATE:** February 28, 2024

### **Response 2.1**

The commenter provides an overview of the proposed project.

This comment is noted.

### **Response 2.2**

The comment states support for development that is consistent with state and federal planning priorities related to equity, the economy, the environment, and public health and safety. The commenter expresses an interest in continued coordination with the District to achieve overall network connectivity.

This comment is noted.

### **Response 2.3**

The commenter requests existing drainage structures in the project area are located and avoided and that existing drainage patterns are maintained.

In its next submittal to Caltrans as part of the encroachment permitting process, the project's design team will provide an updated plan set that notates existing drainage structures and indicates how such structures will be avoided and how existing drainage patterns will be maintained. These updates to the plan set will not affect the analysis or conclusions of the Draft IS-MND because they will not change the fundamental design of the proposed project as evaluated in the Draft IS-MND. Therefore, no revisions to the Draft IS-MND are warranted.

### **Response 2.4**

The commenter requests the segment of the proposed pipeline along State Route 166 be positioned outside the pavement and as close to the State right-of-way as possible. The commenter provides an overview of Caltrans' encroachment permitting requirements.

In its next submittal to Caltrans as part of the encroachment permitting process, the project's design team will provide an updated plan set that incorporates the commenter's requests. As noted under *Description of Project* on page 5 of the Draft IS-MND:

Construction of the pipeline would occur within the existing disturbed roadways and road shoulders, and no construction activities would occur within or below the stormwater and agricultural ditches along Bonita School Road, SR 166, and Black Road. The pipeline would be installed primarily via horizontal directional drilling (HDD) pursuant to California Department of Transportation's (Caltrans) requirements. The HDD pits would be placed approximately 500 feet apart from each other and/or be placed at a horizontal end or deflection in the pipe. All pits would be located within the pavement limits or adjacent to the shoulders of SR 166 and Black Road.

Therefore, the analysis in the Draft IS-MND incorporates the assumption that the proposed pipeline may be installed adjacent to the shoulder of State Route 166, as requested by the commenter. As such, these updates to the plan set will not affect the analysis or conclusions of the Draft IS-MND, and no revisions to the Draft IS-MND are warranted.

In addition, the Draft IS-MND notes an encroachment permit will be required from Caltrans for the proposed project on page 6 under *Other Public Agencies Whose Approval is Required*.

### **Response 2.5**

The commenter provides contact information for further inquiries.

This comment is noted.