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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: San Luis Obispo

1055 Monterey St, San Luis Obispo, CA 93408

From: (Public Agency): County of San Luis Obispo

~~1087 Santa Rosa Street San Luis Obispo, CA 93408~~

1055 Monterey Street, Suite D430 San Luis Obispo, CA 93408

(Address)

Project Title: Paso Robles Groundwater Basin Alluvial Monitoring Wells Network Expansion Project

Project Applicant: County of San Luis Obispo

Project Location - Specific:

Northern San Luis Obispo County (8 locations, see attached document)

Project Location - City: N/A

Project Location - County: San Luis Obispo

Description of Nature, Purpose and Beneficiaries of Project:

The County of San Luis Obispo is proposing the construction and operation of nine new groundwater monitoring wells in the alluvial formations within the Paso Robles Groundwater Basin. See attached for full project description.

Name of Public Agency Approving Project: County of San Luis Obispo

Name of Person or Agency Carrying Out Project: County of San Luis Obispo

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: Class 3, Class 6. Section 15306

Statutory Exemptions. State code number:

Reasons why project is exempt:

The proposed project would meet the criteria to qualify for a Categorical Exemption under the California Environmental Quality Act under both the Class 3 exemption (New Construction or Conversion of Small Structures) and the Class 6 exemption (Information Collection). See attached for supporting evidence.

Lead Agency

Contact Person: Blaine T. Reely (breely@co.slo.ca.us)

Area Code/Telephone/Extension: (805) 781-4206

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: [Handwritten Signature]

Date: 12/26/2024

Title: Environmental Coordinator

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:

**PROJECT OVERVIEW AND EXEMPTION JUSTIFICATION  
FOR THE  
PASO ROBLES GROUNDWATER BASIN ALLUVIAL  
MONITORING WELLS NETWORK EXPANSION PROJECT  
SAN LUIS OBISPO COUNTY, CALIFORNIA**

Prepared for

**County of San Luis Obispo**  
Central Services Purchasing  
1087 Santa Rosa Street  
San Luis Obispo, CA 93408  
Attn: Blaine Reely

Prepared by

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SWCA Project No. 87102

December 2024

# PROJECT OVERVIEW AND EXEMPTION JUSTIFICATION

## Introduction

The County of San Luis Obispo is proposing the construction and operation of nine new groundwater monitoring wells in the alluvial formations within the Paso Robles Groundwater Basin (herein referred to as the project). The primary purpose of these wells is to help the four Basin Groundwater Sustainability Agencies (GSAs) to identify and address potential groundwater level impacts on domestic users, develop an enhanced understanding of areas where interconnected surface water and ground water may occur, refine the hydrogeologic conceptual model, improve the Groundwater Sustainability Plan (GSP) groundwater model to allow the GSAs to make informed decisions regarding Basin management strategies, and to improve tracking progress towards achieving Basin sustainability.

## Project Location

The Paso Robles Area Subbasin of the Salinas Valley Groundwater Basin (referred to herein as the Paso Robles Groundwater Basin, or the Basin) is located in northern San Luis Obispo County, California. The Basin is bounded by the Santa Lucia Range to the west, the La Panza Range to the South, and the Temblor and Diablo Ranges to the east. The Basin overlies approximately 436,000 acres (681 square miles) of land (County of San Luis Obispo 2024).

The nine proposed monitoring wells would be located throughout the Basin within alluvial formations of existing surface water features, including the Salinas River, Estrella River, Huerhuero Creek, Gruenhagen Flats-Indian Creek, Cholame Creek, San Juan Creek, and Sand Creek (see Figure 1). Each of the proposed well sites are described in Table 1 below.

**Table 1. Proposed Monitoring Well Site Locations**

Well Site	Adjacent Surface Water Feature	Coordinates	Access
1	Huerhuero Creek	35.59633, -120.56381	Within County Linne Road Right-of-Way (ROW)
2	Estrella River	35.68469, -120.53395	Unpaved agricultural road off of Estrella Road
3	Estrella River	35.65338, -120.50738	Within County ROW along River Grove Road
4	Gruenhagen Flats-Indian Creek	35.65335, -120.46987	Unpaved agricultural road off of Highway 46
5	Estrella River	35.65714, -120.44167	Unpaved agricultural road
6	Cholame Creek	35.65982, -120.36762	Unpaved private road
7	San Juan Creek	-120.31464, 35.59116	Adjacent to vineyard road
9 <sup>1</sup>	Salinas River	35.753588 -120.69042	On a County-owned parcel

<sup>1</sup> While initial plans included a Well Site 8, this site was ultimately not pursued due to the lack of an access agreement and was removed from this document’s scope of review. Well Site numbering has been maintained for consistency with project documents.

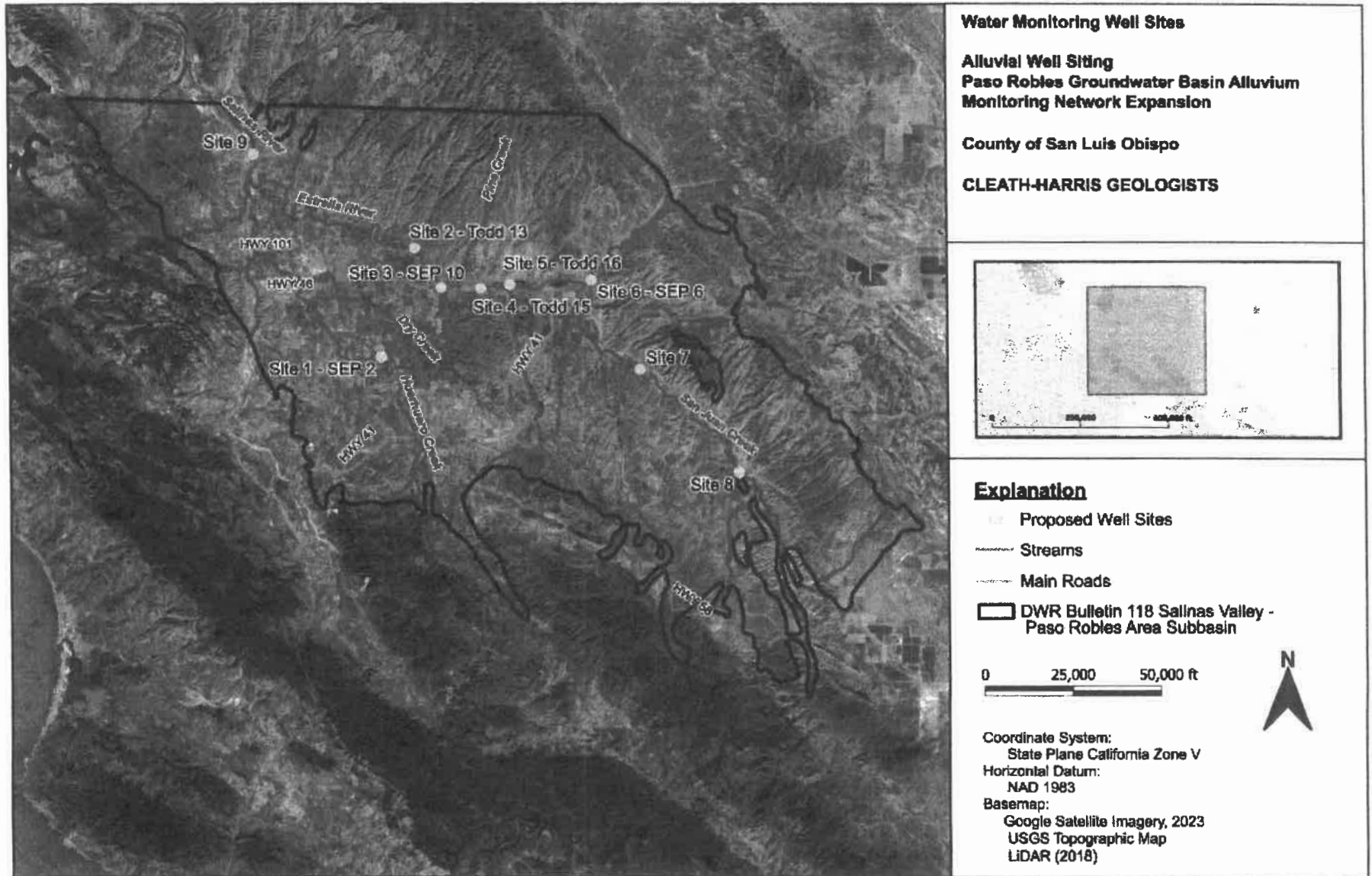


Figure 1. Project Vicinity Map.

## **Environmental Setting**

The Basin is identified by the California Department of Water Resources (DWR) in Bulletin 118 as Subbasin No. 3-004.06 and is classified as a high-priority groundwater basin with critically over-drafted conditions. The Sustainable Groundwater Management Act (SGMA) requires sustainable groundwater management in all high- and medium-priority basins throughout the state of California. SGMA authorizes any local agency, or combination of local agencies (e.g., counties, cities, certain special districts), overlying a groundwater basin to decide to become a Groundwater Sustainability Agency (GSA). There are currently four GSAs that collectively have responsibility for implementing the Groundwater Sustainability Plan (GSP) for the Basin and bringing the Basin into a sustainable condition by 2040: The City of Paso Robles GSA, the Shandon-San Juan GSA, the San Miguel Community Services District GSA, and the County of San Luis Obispo GSA – Paso Robles Area.

The County of San Luis Obispo and the associated San Luis Obispo County Flood Control and Water Conservation District (SLOFCWCD) have jurisdiction over the entire Basin. Routine monitoring of groundwater levels is currently conducted in the Basin by County staff through the SLOFCWCD program. The Basin monitoring network provides publicly available groundwater level data from locations that are designated as public and the locations of monitoring wells reported to the state's California Statewide Groundwater Elevation Monitoring system. The monitoring network also includes a number of other wells in the Basin from which data is collected under confidentiality agreements between the monitoring network participants and SLOFCWCD. Groundwater quality is monitored under several different programs and by different agencies throughout the Basin area (Paso Robles Subbasin Groundwater Sustainability Agencies 2020).

All hydrologic conceptual models contain a certain amount of uncertainty and can be improved with additional data and analysis. The GSP identifies deficiencies in the existing Basin monitoring network as a critical data gap. It is understood that the ability to monitor groundwater levels in the Basin is crucial to the implementation of the GSP.

## **Project Background**

The Sustainable Groundwater Management Act (SGMA) includes specific requirements to identify and consider impacts to groundwater dependent ecosystems (GDEs). The DWR has previously identified a need in the Paso Robles Subbasin GSP to better monitor and protect GDEs. An Interconnected Surface Water Assessment Memorandum was prepared by Todd Groundwater in January 2022 to identify locations of GDEs within the Basin, evaluate ecological characteristics and trends over time within these areas, and identify critical sites for additional groundwater level and water quality monitoring based on these biological factors (Todd Groundwater 2022). The proposed locations for construction and operation of groundwater monitoring wells associated with this project correlate to GDEs identified in the 2022 Interconnected Surface Water Assessment Memorandum. The data collected from these sites could improve GSA's understanding of these systems and enhance basin managers' understanding of the impacts of Basin management decisions on these ecosystems.

Eight potential monitoring well sites were identified to help improve the overall monitoring and data collection of the shallow alluvial groundwater on which the GDEs depend. These potential sites were selected based on a number of criteria including: proximity to surface water/groundwater interconnection environmental features identified by the Interconnected Surface Water Assessment, location within Older Alluvium (Qoa) above the active channel of surface water features, locations with existing access via roads or ranch roads, nearly level topography, areas within County/State Right of Way (if possible),

absence of overhead powerlines and cut banks, minimal overhead vegetation, and locations where the Older Alluvium would be deepest.

## **Project Description**

The project includes installation and operation of 8 groundwater monitoring wells throughout the Basin. Each groundwater monitoring well would be 4 to 5 inches in diameter and 60 feet deep, with an automatic transducer that would send well data to County staff for monitoring purposes. Installation of each well would require a well permit, and encroachment permits would be required for Well Sites 1 and 3 based on their location within existing County road ROW. In addition, Well Site 3 would also have the potential to require a grading permit to accommodate minor leveling and grading on the site to ensure that the well drill site is nearly level. Project details are provided below.

### *Construction*

Installation of each monitoring well would require establishment of temporary, 20-foot-wide access easements for well sites located on private property (Well Sites 2, 4, 5, and 7). Vegetation clearance would be conducted within these temporary access easements as needed to reduce fire ignition hazard for construction-related vehicles, consisting primarily of mowing. All vegetation cuttings would be hauled away on the same day as clearance activities via truck to be disposed of at the nearest solid waste facility, and less than one truck load of vegetation cuttings is expected to result from the vegetation clearance activities at each well site. Hand tools would be used for minor leveling at each proposed well site, with the exception of Well Site 4, which may require grading. Construction equipment to be used at each well installation site is summarized below:

- 1 drilling rig
- 1 pipe rig
- 2 Support vehicles (Pickup/SUV)

Wells would be drilled using two rigs, a drilling rig and a pipe rig. Excavation for each well would be 12 inches in diameter and have a maximum depth of 65 feet, resulting in approximately 51 cubic feet of tailings, to be contained by the driller and hauled to an off-site disposal site. Drilling at each site would last up to 12 hours and would occur in one day, with hours of construction occurring between 6:00 a.m. and 6:00 p.m., for a total of 8 days of construction activities. All drilling is expected to occur during daylight hours and nighttime lighting would not be necessary. The drilling area for each well site where equipment would be staged would include approximately a 50-foot by 150-foot area. Construction activities are anticipated to be conducted in March 2025. Portable restrooms and handwashing stations would be provided for construction crew workers at each site.

Upon completion of drilling and equipment installation, all roadside well sites except for Sites 1 and 3 would also include installation of four, 4-foot bullocks around the well sites for protection (i.e., from agricultural equipment). Well Sites 1 and 3, because they are located adjacent to public roadways, would have a flush mounted well box (no bullocks) to allow for cars to drive over them if needed. Permanent easements would be required for each well site permanent area of disturbance, including a 10-foot by 10-foot area around each well.

### *Operation*

County staff would conduct regular monitoring visits to each well twice a year (approximately during April and October) to verify water level data. Water sampling would also occur periodically (less than

twice a year), and maintenance visits would occur to each well site as needed. The proposed automatic transducer batteries to be installed at each well site would be replaced at the end of each cycle of their operational lifetime (every 3 years).

## **Exemption Justification**

The proposed project would meet the criteria to qualify for a Categorical Exemption under the California Environmental Quality Act under both the Class 3 exemption (New Construction or Conversion of Small Structures) and the Class 6 exemption (Information Collection).

The Class 3 exemption applies to construction and location of limited numbers of new, small facilities and installation of small new equipment. While this exemption does not include specific limitations on square footage, it includes a list of example projects that would qualify for this exemption including “water main, sewage, electrical, gas, and other utility extensions, including street improvements of reasonable length”. Based on the limited number of proposed monitoring wells, limited total area of permanent disturbance associated with each well site, and nature of the proposed project being similar to utility infrastructure, the project meets the criteria established in this exemption.

The Class 6 exemption applies to basic data collection, research, experimental management, and resource evaluation activities that do not result in a serious or major disturbance to an environmental resource. These may be strictly for information gathering purposes. Based on the limited number of proposed monitoring wells, limited total area of permanent disturbance associated with each well site, and purpose of the proposed project being for data collection, the project meets the criteria established in this exemption.

Based on Section 15300.2 of the State CEQA Guidelines, the project must not trigger any of the exceptions identified as having the potential to disqualify a project from being exempt. These exceptions include projects that are located in a particularly sensitive environment, projects with significant cumulative impacts, projects with significant impacts due to unusual circumstances, projects which may result in damage to scenic highways, projects located on a site which is included on any hazardous waste site list, and projects which may cause a substantial adverse change in the significance of a historical resource. The proposed project has been evaluated to determine whether any of these exceptions would apply, as detailed below.

- **Location.** On October 15, 2024, staff at the Central Coast Information Center (CCIC) conducted a California Historical Resources Information System (CHRIS) records search of the project areas and adjacent areas within a 0.25-mile radius and SWCA Environmental Consultants conducted an archaeological field survey and reconnaissance biological resources survey of each well site and access pathway on October 28 and 29, 2024.

The records search revealed that approximately 30 percent of the project area had been previously subjected to cultural resources study and that no previously recorded cultural resources are within the project area. Additionally, the results of the Sacred Lands File (SLF) search did not identify the project area as being sensitive for the presence of prehistoric archaeological resources. Visibility within unpaved portions of the project areas during the pedestrian archaeological survey was fair to excellent depending on the density of vegetation growth. No previously unidentified cultural resources were identified as a result of the pedestrian survey (SWCA Environmental Consultants 2024).

Based on the results of the biological reconnaissance survey, it was determined that the project would not result in any direct impacts to nearby riparian habitats, no small mammal burrows were



observed within the project's areas of proposed disturbance, and there were no observances of special status species during the survey. While it was noted that Swainson's hawk is known to occur in the project region, a desktop review of the California Natural Diversity Database (CNDDB) and other sources indicate that there are no known nests within 1 mile of any of the sites and no nests were observed during the survey.

Based on the results of the Cultural Resources Survey Report prepared for the project and reconnaissance biological survey, the project would not be located within areas that are particularly sensitive.

- **Significant Cumulative Impact.** Based on the analysis provided above, the project would not have the potential to result in significant cumulative impacts associated with biological resources or cultural resources. In addition, the project would not result in a notable increase in water demand as the monitoring wells would be used to measure water levels and measure water quality for informational data collection purposes only, not for production, and only periodic sampling would occur. The project would not result in a significant new demand of energy or other utilities. Therefore, the project would not result in any cumulatively considerable environmental impacts.
- **Significant Effect Due to Unusual Circumstances.** As described above, the project would not result in any potentially significant impacts during construction or operation related to biological resources, cultural resources, or hydrology and water quality. In the event that cultural resources are exposed during project implementation and a cultural monitor is not on-site, work would be required to stop in the immediate vicinity, and an archaeologist would be retained to evaluate the find and recommend appropriate mitigation measures in accordance with County Land Use Ordinance. In the event that human remains are discovered, California Health and Safety Code Section 7050.5 would be required to be adhered to. Due to the temporary nature of project construction activities, potential impacts associated with construction noise, energy, air pollutant emissions, and greenhouse gas emissions would be less than significant. Due to the limited area of permanent disturbance, no potentially significant impacts associated with geology and soils or agriculture would occur.

Based on the analysis provided above, the project would not have a significant effect on the environment due to unusual circumstances.

- **Impacts to Scenic Highways.** There are no designated State Scenic Highways within proximity of any of the proposed well sites (California Department of Transportation [Caltrans] 2018). However, Highway 46 is designated as Eligible for listing as State Scenic Highway (Caltrans 2018). Construction equipment may be visible from Highway 46 during construction activities for Well Sites 3, 4, 5, and 6. However, construction and well installation at each well site would occur within a 24-hour period and following construction, above-ground components would be limited to four, 4-foot-tall bullocks at Well Site 3. Therefore, the project would not have the potential to damage views from a scenic highway.
- **Hazardous Waste Sites.** A search was conducted by SWCA Environmental Consultants using the Department of Toxic Substances Control (DTSC) EnviroStor and the State Water Resources Control Board (SWRCB) GeoTracker databases to identify proximate hazardous waste sites for each of the proposed well sites. The search revealed that no recorded hazardous waste sites are located within a 0.25-mile radius of any proposed well site (DTSC 2024; SWRCB 2024). Therefore, the project would not be located on a site which is included in any list compiled pursuant to Section 65962.5 of the Government Code.
- **Impacts to Historical Resources.** On October 15, 2024, staff at the Central Coast Information Center (CCIC) conducted a California Historical Resources Information System (CHRIS) records

search of the project areas and adjacent areas within a 0.25-mile radius. The search revealed that approximately 30 percent of the project area had been previously subjected to cultural resources study and that no previously recorded cultural resources are within the project area. In addition, no historic-age or prehistoric-age resources were identified within the project disturbance areas during the archaeological field survey of each well site and access path area conducted by SWCA Environmental Consultants in October 2024. Therefore, the project would not cause a substantial adverse change in the significance of a historical resource.

As described above, the project meets the criteria for Class 3 and Class 6 Categorical Exemptions and would not trigger any of the exceptions listed in Section 15300.2 of the State CEQA Guidelines.

## **References**

California Department of Toxic Substances Control (DTSC). 2024. EnviroStor. Webpage available at: <https://www.envirostor.dtsc.ca.gov/public/>. Accessed November 2024.

California Department of Transportation (Caltrans). 2018. California State Scenic Highway System Map. Available at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed November 2024.

California State Water Resources Control Board (SWRCB). 2024. GeoTracker. Webpage available at: <https://geotracker.waterboards.ca.gov/>. Accessed November 2024.

County of San Luis Obispo. Paso Robles Groundwater Basin. Webpage available at: <https://www.slocounty.ca.gov/departments/groundwater-sustainability/groundwater-basins/paso-robles-groundwater-basin>. Accessed October 2024.

Paso Robles Subbasin Groundwater Sustainability Agencies. 2020. Paso Robles Subbasin Groundwater Sustainability Plan. January 31, 2020. Available at: <https://sgma.water.ca.gov/portal/gsp/preview/35>. Accessed October 2024.

SWCA Environmental Consultants. 2024. Cultural Resources Survey Report for the Paso Robles Groundwater Basin Alluvial Monitoring Well Network Expansion Project, San Luis Obispo County, California. November 2024.

Todd Groundwater. 2022. Interconnected Surface Water Assessment, Paso Robles Basin GSP. January 31, 2022.