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August 7, 2024

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aguerra@buchalter.com

Kavitha Kumar, Interim Planning Director
Stefanie Cervantes, Interim Deputy Director
Planning Department
City of Pacifica
540 Crespi Drive
Pacifica, CA 94044

Re: Rockaway Quarry Site Reclamation Plan – File No. 2016-001
Supplemental Information in Support of June 28, 2004 Letter Outlining Approach
to Reduce Imported Fill to Reclaim Rockaway Quarry

Dear Kavitha and Stefanie:

As you know, Buchalter, APC, represents The Preserve @ Pacifica, LLC (“The Preserve”) and Baylands Soil Pacifica, LLC (“Baylands”) regarding the land use approvals for reclamation of the Rockaway Quarry in the City of Pacifica (“Pacifica”). Baylands is processing a reclamation plan (“Reclamation Plan”) at The Preserve’s request to reclaim the Rockaway Quarry (the “Quarry Site” or “Quarry Pit”). The purpose of this letter is to supplement our June 28, 2024 regarding “Rockaway Quarry Site Reclamation Plan – File No. 2016-001 (“June 28th Letter”) to explain how The Preserve and Baylands approached the reclamation effort with an objective of further lessening the amount of imported fill associated with reclamation of the Rockaway Quarry Site. The June 28th Letter and prior Rockaway Quarry Reclamation Plan submittals for the reclamation of the Quarry Site associated with File No. 2016-001 are hereby incorporated by reference.

My clients do not have any plans for development of the Rockaway Quarry property. Baylands Soil Pacifica has plans to reclaim the Quarry Site on The Preserve at Pacifica’s behalf. My clients outlined The Preserve at Pacifica’s strategy at the May 2024 Planning Commission Study Session to start reclamation while my client would engage in a planning process with the City of Pacifica to determine what future development could look like. We submitted a letter on June 28, 2024 (“June 28th Letter”) that further explained the strategy to use the Rockaway

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Quarry Reclamation Plan Draft EIR's Reduced Fill Alternative to show how starting reclamation of the Quarry Site could provide time for the City and The Preserve at Pacifica to engage in a planning process while further reducing the amount of imported fill needed for reclamation. This letter supplements the narrative provided in our June 28th Letter. This letter further describes the Reduced Fill Alternative parameters that focus on substituting imported fill with flat pads in an area identified in the Pacifica General Plan Land Use Map Figure 4-7 for the future use following reclamation consistent with the Surface Mining and Reclamation Act ("SMARA").

Rockaway Quarry EIR Reduced Fill Alternative Description

The Reduced Fill Alternative described on Draft EIR pages 6-18 to 6-21 contemplated that the Reclamation Plan would be designed to use the minimum amount of fill in the Quarry Pit to meet SMARA requirements but the Draft EIR did not specify a specific amount. The Draft EIR Reduced Fill Alternative was designed to meet the basic project objectives including reclamation to a usable condition which is readily adaptable for alternative land uses. While the minimum fill would alter the amount of fill within the Quarry Pit, the alternative would still complete the remaining reclamation activities proposed under the proposed project, including the installation of new trails, improvements to existing trails, addition of hazard signs, regrading of loose soil, installation of new wetlands, installation of temporary and permanent culverts, and revegetation plan.

Even though development is not proposed as an element of the Reclamation Plan as we explained at the Study Session and in our May 9, 2024 and June 28th letters, the Reclamation Plan still needs to anticipate how to adapt the Quarry Site to allow future development in order to comply with SMARA. Consequently, Walsh Engineering used the Draft EIR's Reduced Fill Alternative framework to further clarify the lowest amount of imported fill that would be needed to reclaim the Quarry Site consistent with SMARA.

Development Pad with Reduced Fill Option

To further clarify the potential options for a Reduced Fill Alternative, we evaluated prior reclamation plan efforts for the Rockaway Quarry since 1996 to determine the amount of imported fill under each prior plan and document whether or not the prior reclamation plan satisfied SMARA criteria in addition to other project criteria, as shown in the attached **Table 1, Rockaway Quarry Reclamation Plan Comparison**. Walsh Engineering compared a Reduced Fill Alternative as further defined in the Walsh Engineering Concept Site Plan dated June 28, 2024 and attached to our June 28th Letter to the other prior proposed and/or approved reclamation plans considered for the Quarry Site.

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Section 2773 of SMARA states:

“(a) The reclamation plan shall be applicable to a specific piece of property or properties, shall be based upon the character of the surrounding area and such characteristics of the property as type of overburden, soil stability, topography, geology, climate, stream characteristics, and principal mineral commodities, and shall establish site-specific criteria for evaluating compliance with the approved reclamation plan, including topography, revegetation and sediment, and erosion control.”

SMARA Section 2773 also provides that:

“(b) These standards shall apply to each mining operation, but only to the extent that they are consistent with the planned or actual subsequent use or uses of the mining site.”

These SMARA provisions set the framework for assessing a reclamation plan option that contemplates reclaiming the site to a flat development pad as a planned use in lieu of reclamation to a hillside topography with no development (e.g., open space) as an actual subsequent use.

Because the Project is a reclamation project and no development is proposed, and a development project has not been approved for the Quarry Site (despite prior attempts at development over several decades), Walsh Engineering referred to the Pacifica General Plan’s land use designation and Pacifica zoning on the Quarry Site to define the approved allowable end uses to meet SMARA’s requirement. In this regard, the General Plan has designated commercial and residential uses on the project site since 1983. The General Plan currently designates the Quarry Site Special Area. The site is zoned Visitor Serving Commercial. Most of the permitted uses would require a relatively flat pad or terraced pads. Building such a pad would reduce the amount of fill required to about 653,000 cubic yards as explained in the June 21, 2024 Walsh Engineering Memorandum, Rockaway Quarry Reclamation Plan Technical Responses to Items Noted in the May 20, 2024 City Study Session attached to our June 28th Letter (“Walsh Memorandum”).

The surrounding topography imposes a physical constraint in generating fill on site. Our June 28th letter and associated Exhibits summarized the engineering associated with generating fill material on site to fill the quarry. The reduced amount of fill associated with flat development pads does not rely on any specific type of development based on zoning. Regardless of the type of development, the reduced quantity fills the Quarry floor to a pad elevation of 85 feet and extends a 2:1 fill slope up 50 feet higher than the pad to the 135 foot elevation contour to restore the Quarry face. This conforms with SMARA while resulting in an estimated 5 acres of land area that could be developed with General Plan land uses in the future as explained in our June 28, 2024 Letter.

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Exhibit A contains two exhibits depicting the existing topography that imposes the physical constraints influencing reclamation of the Quarry Site. Walsh Engineering has prepared the attached **Exhibit A.1** displaying the aerial imagery of the site overlaid with the Reduced Fill Option which indicates the critical elevation of 135 foot contour at the Quarry Face and the observable erosion and instability of the areas below the 135 foot elevation. Visible trails can also be seen above the erosion and unstable areas. Walsh Engineering has also prepared the attached **Exhibit A.2** as a side by side comparison of the reduced fill concept reflected in the June 28, 2024 Concept Site Plan and the previously submitted further clarification and refinements of the proposed project. The creation of the flat pad and factors shown in Exhibit A.2 result in a substantial reduction of fill for the project compared to the 9/1/2023 Revised Project Reclamation Plan.

My client needs to fill the quarry pit and grade the site to restore wetlands and habitat as part of reclamation. It takes approximately 653,000 cubic yards of fill (583,000 cubic yards of which is imported fill), to do that even with a future effort to implement development as reclamation proceeds. Without the ability to replace dirt with foundations, reclaiming the Rockaway Quarry requires a lot more dirt as demonstrated by the proposed 2023 Reclamation Plan. The reason is that the amount of fill needed to fill the quarry is driven by the existing topography and not by the type of development that may someday be developed on the Property.

Another constraint to being able to generate fill on-site is the City's Hillside Preservation District (HPD) Ordinance which also guides the maximum amount of coverage area allowed to be disturbed with reclamation or development. Removing more of the hilltop in order to generate material to fill the quarry will expand the grading limits for the disturbed area in conflict with the HPD Ordinance which requires that the existing hillside be preserved. Increasing the grading limits exceeds the allowable coverage area for HPD Requirements in conflict with the HPD Ordinance.

We have prepared the attached summary to explain how reclamation reflected in the June 28, 2024 Concept Site Plan for the Reduced Fill Alternative would satisfy the SMARA findings and the City's Municipal Code Section 9-2.07. In conjunction with the findings for the June 28, 2024 Concept Site Plan for the Reduced Fill Alternative, we are submitting responses from WRA, the project biologist addressing comments from the Coastal Commission related to the Reduced Fill Alternative.

Next Steps

As my client stated at the May 20, 2024 Study Session and we reiterated in our June 28th Letter, The Preserve at Pacifica would be in support of an approach whereby the Planning Commission recommends approval of the Draft EIR Reduced Fill Alternative for the Reclamation Plan consisting of up to approximately 583,000 cubic yards as the maximum

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amount of imported fill to reclaim the Quarry Site subject to compliance with SMARA. Our proposed strategy for clarifying further the Draft EIR's Reduced Fill Alternative is to proceed with reclamation to provide time for the City and The Preserve at Pacifica to engage in a planning process to determine what future development could look like.

We appreciate your consideration of our proposed strategy to address the Planning Commission's comments and look forward to obtaining the Planning Commission's direction regarding next steps regarding achieving reclamation that is adaptable to the future use of the Property.

Regards,

BUCHALTER
A Professional Corporation

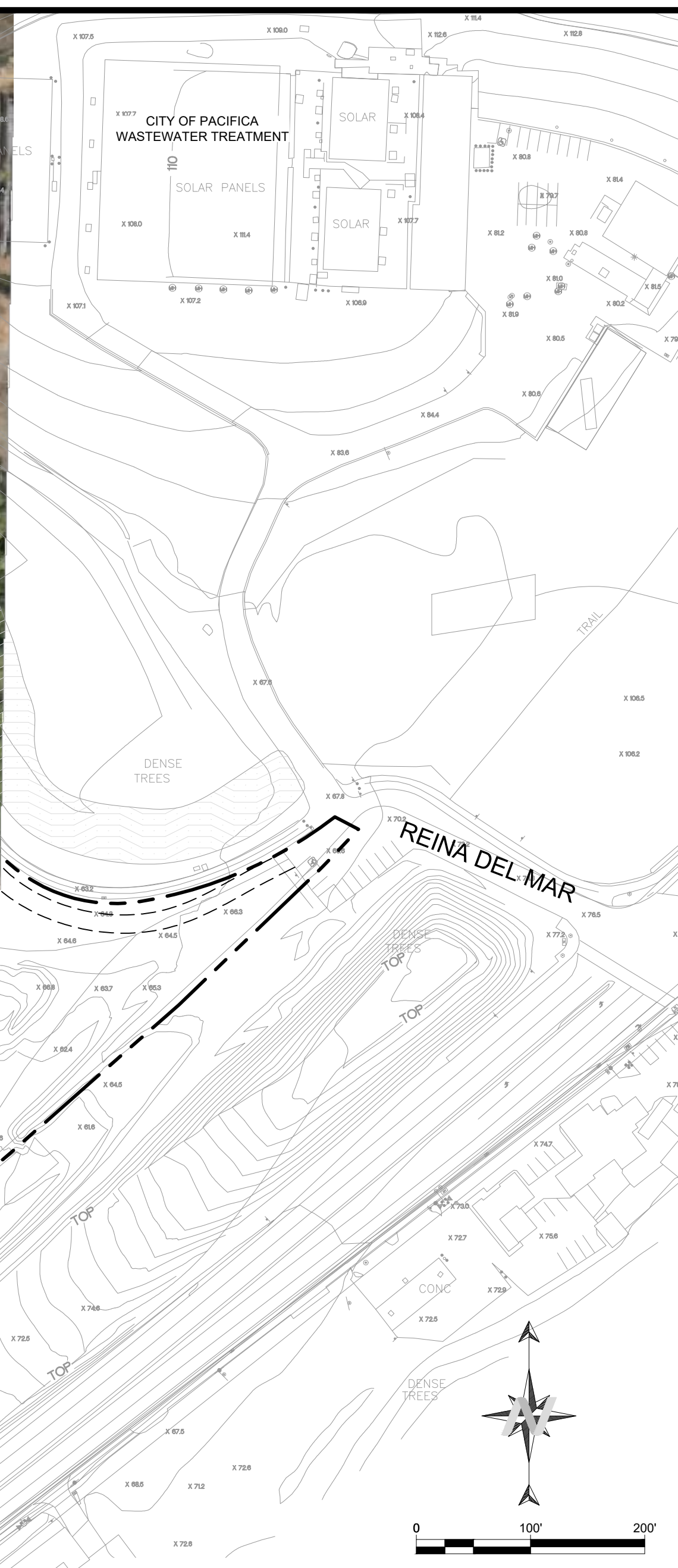


Alicia Guerra

AG:nj

Attachments

cc: Michelle Kenyon
Karen Murphy
Kevin Woodhouse
Paul Heule
Billy Gilmartin
Matt Walsh



- GRADING KEYNOTES**
- TYPE "A" CONCRETE LINED DITCH PER CITY OF PACIFICA STD. DWG 202 ON SHEET C3.1.
 - DRAINAGE TERRACE PER DETAILS 4 AND 5 ON SHEET C3.0. WIDTH PER PLAN.
 - MATCH EXISTING GRADE OF DIRT PEDESTRIAN PATH.
 - APPROXIMATE LIMIT OF SHEAR ZONE PER SOILS REPORT BY GEOCON, INC. DATED 10/22/2015.
 - EARTHEN BERM AT TOP OF SLOPE PER DETAIL 7 ON SHEET C3.0.
 - MULTI-USE TRAIL AND ACCESS PATH PER DETAIL 1 ON SHEET C3.0.
 - TEMPORARY RECLAMATION ACCESS (SEE ACCESS PLAN). CONSTRUCT PER DETAIL 1 ON SHEET C3.0.
 - REMOVE DUMPED FILL AND STABILIZE NATURAL GRADE.
 - EXISTING OUTCROPPING, TO REMAIN.
 - VEGETATED SWALE PER DETAIL 3 ON SHEET C3.0.
 - ROCK ENERGY DISSIPATOR PER DETAIL 9 ON SHEET C3.0.
 - BIO-SWALE PER DETAIL 10 ON SHEET C3.0.
- GENERAL NOTES**
- SHEAR ZONE AND SOILS INFORMATION SHOWN PER GEOTECHNICAL REPORT BY GEOCON CONSULTANTS INC. DATED 10/22/2012.
 - ALL CLEARING, GRUBBING, SITE PREPARATION, OVEREXCAVATION, EARTHWORK, ENGINEERED FILL, STABILITY FILLS, SLOPE STABILIZATION, SUB-DRAINAGE, AND MATERIAL TESTING SHALL BE IN COMPLIANCE WITH THE APPROVED GEOTECHNICAL ENGINEERING REPORT.
 - FEMA SPECIAL FLOOD HAZARD AREAS SHOWN PER FIRM MAP NO. 06081C0126E EFFECTIVE DATE 10/16/2012.
 - SEE STORM DRAIN UTILITY INFORMATION AND INVERTS ON DRAINAGE PLAN, SHEET C2.0.
 - PRIOR TO COMMENCEMENT OF ANY ONSITE RECLAMATION WORK, PROJECT SHALL REQUIRE ISSUANCE OF A GRADING PERMIT.
 - PRIOR TO COMMENCEMENT OF ANY ONSITE RECLAMATION WORK, THE APPLICANT SHALL PROVIDE TO THE FIRE CHIEF A CONSTRUCTION SCHEDULE AND SHALL INFORM THE FIRE DEPARTMENT OF ANY ROAD CLOSURES THAT MAY OCCUR ON PUBLIC OR PRIVATE ROAD.
 - THE ORDINARY HIGH WATER ELEVATION IS 5.03' DATED MARCH 2013. HISTORICAL TIDE DATA TAKEN FROM NOAA STATION I.D. 9414290 SAN FRANCISCO, CA.
 - REMEDIAL GRADING PER SOILS REPORT. APPROXIMATE EXTENTS SHOWN ON SHEETS C4.0 AND C4.1.
 - SEE GEOTECHNICAL REPORT FOR LOCATION OF DUMPED FILL/MINE WASTE. ALL SAID MATERIALS WILL BE REMOVED AND PLACED AS RECOMPACTED FILL PER GEOTECHNICAL REPORT.

GENERAL LEGEND

- EXISTING BOUNDARY LINE
- EXISTING EASEMENT
- EXISTING UTILITY AND TYPE

GRADING + DRAINAGE LEGEND

- PROPOSED VEGETATED SWALE
- PROPOSED MAJOR CONTOUR
- PROPOSED MINOR CONTOUR
- DAYLIGHT OF GRADING LIMITS
- GRADE BREAK
- LIMIT OF DISTURBANCE
- TOP OF SLOPE
- TOE OF SLOPE
- DROP INLET
- EXISTING TREE/TREE NUMBER

AREA OF DISTURBANCE

- FEMA SFHA ZONE A
- FEMA SFHA ZONE V
- FEMA SFHA ZONE X
- WETLAND DELINEATION

EARTHWORK QUANTITIES

AREA NAME	CUT	FILL	NET
MAIN FACE & MAINTENANCE RD.	69,000 CY	20,000 CY	-49,000 CY (CUT)
QUARRY PIT	1,000 CY	633,000 CY	+632,000 CY (FILL)
TOTAL	70,000 CY	653,000 CY	+583,000 CY (FILL)

REVISIONS

NO.	DATE	DESCRIPTION

WE WALSH ENGINEERING
 WALSHENGINEERING.NET (805) 319-4948
 1108 GARDEN STREET, SUITE 202-204 SAN LUIS OBISPO, CA 93401

ROCKAWAY QUARRY
 RECLAMATION PLAN
 PACIFICA CA

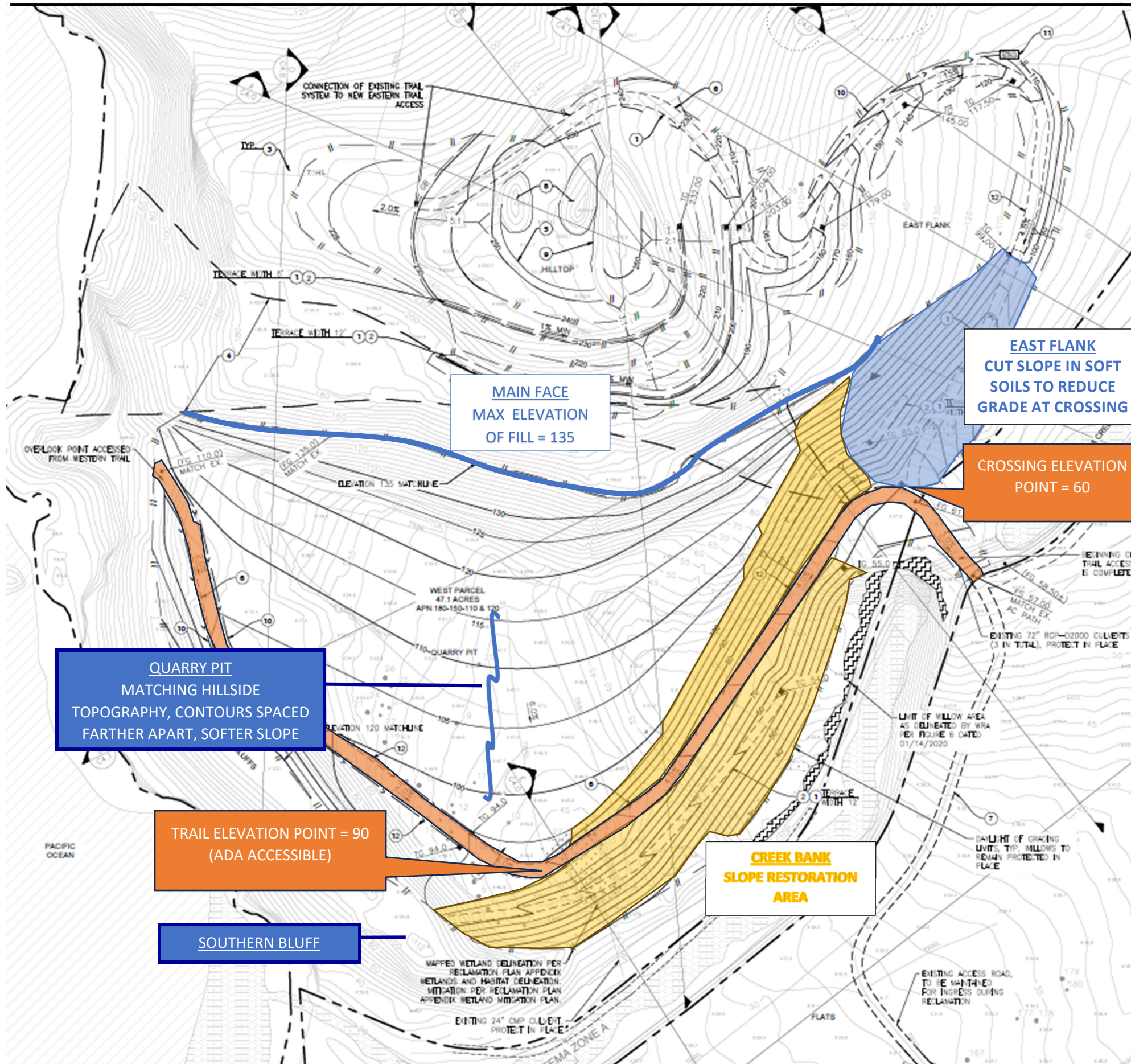
PRELIMINARY
 CONCEPT
 PLAN
 ILLUSTRATING
 REDUCED FILL
 OF THE
 DEVELOPMENT
 AREA SHOWN
 ON THE
 GENERAL PLAN
 FIGURE 4-7
 WITH AERIAL
 PHOTO
 ANNOTATIONS

DATE: 8/7/2024
 SHEET
EXH A.1

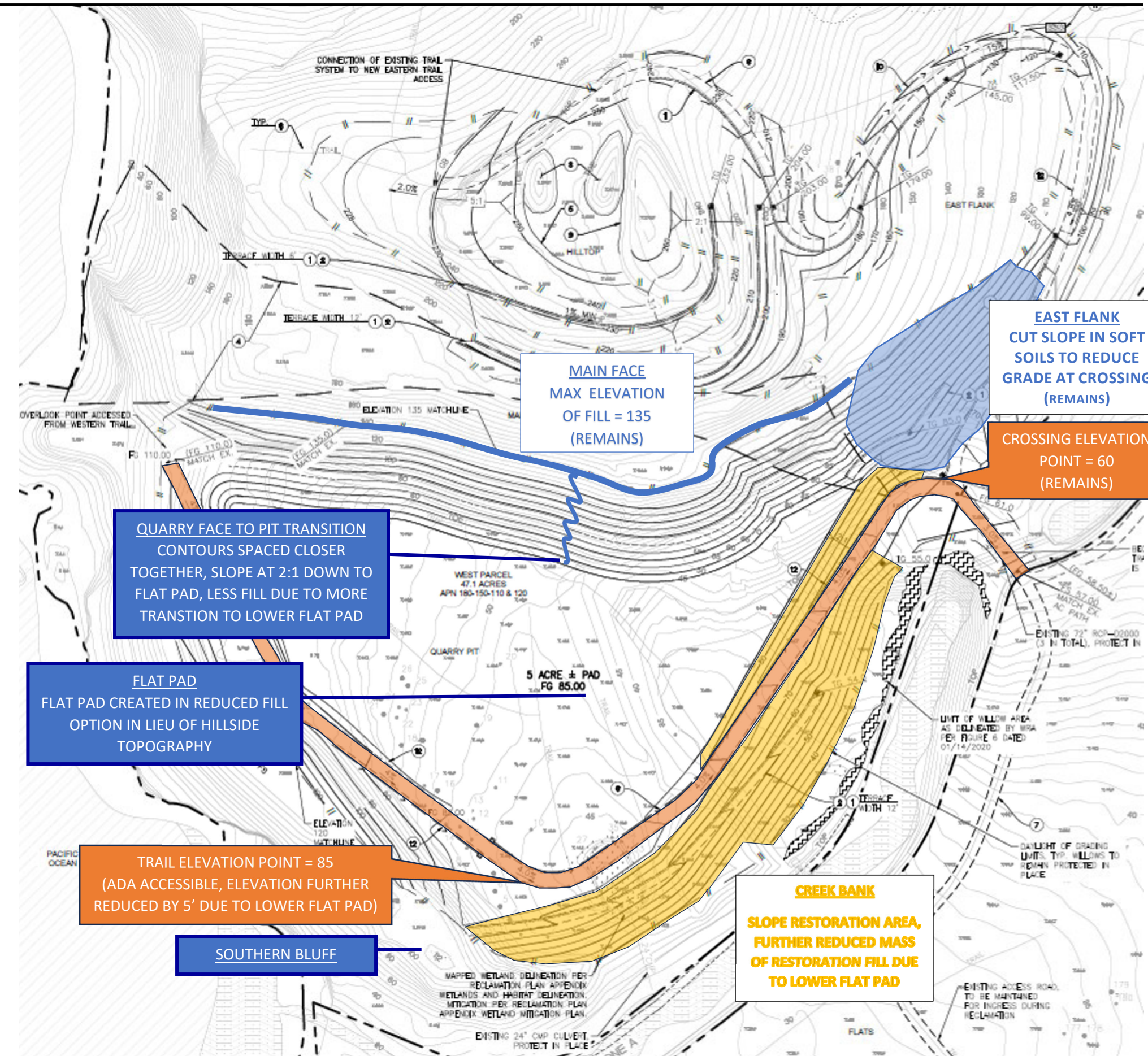
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NOTE: UTILITIES SHOWN WERE PLOTTED FROM OBSERVED EVIDENCE AND PLANS OBTAINED FROM UTILITY PROVIDERS. EXACT LOCATIONS AND QUANTITIES MAY VARY. THE CONTRACTOR SHALL CALL 811 FOR UTILITY LOCATING SERVICES PRIOR TO EXCAVATION AND USE EXTREME CAUTION WHEN EXPOSING UTILITIES. ANY DAMAGE TO EXISTING UTILITIES WILL BE THE SOLE RESPONSIBILITY OF THE CONTRACTOR.



+874,000 CY (FILL)



+583,000 CY (FILL)

Narrative Description of Further Clarifications and Refinements of Proposed Project

- CREEK BANK RESTORATION (YELLOW SHADING):** SMARA Section 3503(b) & (e) outlines the need for water quality and watershed control. The proposed project restores the uplands of Calera Creek by incorporating a 2:1 slope to provide a natural upland and improved watershed control while conveying surface runoff to natural drainage courses. The reduced fill concept has reduced the massing of the creek upland restoration by lowering the grades of the top of the uplands to arrive at the flat pad elevation of 85' and reducing the width of the 2:1 slope portion resulting in a reduction of fill.
- ACCESSIBILITY (ORANGE SHADING):** SMARA Section 2712(c) states that a primary objective of the Act is to eliminate residual hazards to public health and safety. The reduced fill concept maintains a path that is maneuverable at ADA compliant slopes and provides access for emergency vehicle uses when needed. The location of the proposed path pulls users away from unsafe bluff edges. Slopes adjacent to paths that are 2:1 or less are inherently safer for users. The grade has been maintained at an elevation of 60 at the Calera Creek crossing and grade has been reduced by another 5' at the westerly curve of the path to make it accessible while also resulting in a reduction of fill.
- TOPGRAPHY AND SLOPES (BLUE SHADING):** SMARA Section 3704(e) states all fill slopes shall conform with the surrounding topography and/or approved end use. The proposed project restores the land to conform with the surrounding topography by using a 2:1 slope at Calera Creek which creates a natural creek uplands and brings the grade up to an elevation that blends with the existing Southern Bluff. SMARA Section 3704(d) establishes the guideline that 2:1 is a maximum steepness of slope. The reduced fill concept has lowered the fill elevation from an average elevation of 110 feet down to a flat pad elevation of 85 resulting in a reduction of 25' less height of fill on average across the Quarry Pit, which has contributed to a larger reduction of fill for reclamation. A 2:1 slope at the East Flank is maintained to establish the grades necessary for meeting the goals of accessibility. The 2:1 slope blends from the East Flank and extends along the creek bank to the Southern Bluff. The reduced fill concept incorporates a new 2:1 slope down the quarry face from the 135' elevation contour down to the pad elevation of 85. This concept was implemented in compliance with SMARA Section 2773(a)(b) to reclaim the site to a flat development pad as a planned use in lieu of reclamation to a hillside topography of no development as an actual subsequent use.

Rockaway Quarry Reclamation Plan Descriptions

The following descriptions refer to reclamation plans identified in Table 1: Rockaway Quarry Reclamation Plan Comparison.

10/28/1996 Reclamation Plan: This plan called for reclamation of all disturbed mined lands, eliminated eroded and unvegetated mined lands, eliminated slopes steeper than 2:1, and removed eroded slopes adjacent to trails for safety. The grading includes 1,414,400 cubic yards of earthwork with 707,200 cubic yards of cut removed from the main face with excavation depths up to 60 feet to establish slopes at 2:1 as well as cutting down of the southern bluff. The material removed was to be placed as 707,200 cubic yards of fill to establish a developable flat pad at an elevation of 85 at the quarry pit in addition to a developable flat pad at the eastern flank at an elevation of 75. The slopes established by this plan would have been steeper than the nearby hillside topography.

1/22/2016 Reclamation Plan: This plan did not include coverage of all disturbed mined lands, did not eliminate eroded mined areas, and did not mitigate eroded slopes adjacent to trails. It left mined slopes at the quarry face in place that were steeper than 2:1. The grading includes 216,000 cubic yard of earthwork including 108,300 cubic yards of cut from the hilltop to establish a 2:1 slope, removal of a portion of the southern bluff, established a 2:1 slope eastward of the southern bluff sloping down to a developable flat pad established by 107,700 cubic yards of fill at the quarry pit to raise it to an elevation of 50. The plan left the steep quarry face un-reclaimed. The slopes established by this plan would have been steeper than the nearby hillside topography and buildings were anticipated in conjunction with this plan.

4/5/2023 Reclamation Plan: This plan calls for reclamation of all disturbed mined lands, eliminated eroded and unvegetated mined lands, eliminated slopes steeper than 2:1, and removed eroded slopes adjacent to trails for safety. The grading includes 1,140,000 total cubic yards of earthwork with 85,000 cubic yards of cut from grading the hilltop to a 3:1 slope. It preserves the southern bluff at its current elevation while bringing 970,000 cubic yards of fill to establish a natural uplands area adjacent to the creek and fills the quarry pit across to the main face up to an elevation of 150. The slopes established by this plan conform to the surrounding topography and are consistent with a natural open space hillside relevant to pre-mining conditions. There is no development proposed with this plan and no flat pads are created.

9/1/2023 Reclamation Plan: This plan calls for reclamation of all disturbed mined lands, eliminated eroded and unvegetated mined lands, eliminated slopes steeper than 2:1, and removed eroded slopes adjacent to trails for safety. The grading includes 1,014,000 total cubic yards of earthwork with 70,000 cubic yards of cut from grading the hilltop to a 3:1 slope. It preserves the southern bluff at its current elevation while bringing 874,000 cubic yards of fill to establish a natural uplands area adjacent to the creek and fills the quarry pit across to the main face up to an elevation of 135, which was identified as a critical elevation at the quarry face where unvegetated soils have eroded adjacent to active trails. It also provides for an ADA accessible path connecting the multi-use trail across to the northwesterly overlook point of the bluff. The slopes established by this plan conform to the surrounding topography and are consistent with a natural open space hillside relevant to pre-mining conditions. There is no development proposed with this plan and no flat pads are created.

6/28/2024 Reduced Fill Alternative Reclamation Concept: This concept calls for reclamation of all disturbed mined lands, eliminates eroded and unvegetated mined lands, eliminates slopes steeper than 2:1, and removes eroded slopes adjacent to trails for safety. The grading includes 723,000 total cubic yards of earthwork with 70,000 cubic yards of cut from grading the hilltop to a 3:1 slope. It preserves the southern bluff at its current elevation while bringing 583,000 cubic yards of fill to establish a natural uplands area adjacent to the creek and fills the quarry pit up to a flat pad elevation of 85. The grading establishes a 2:1 fill slope extending from the flat pad up the quarry face at an elevation of 135, which was identified as a critical elevation at the quarry face where unvegetated soils have eroded adjacent to active trails. It also provides for an ADA accessible path connecting the multi-use trail across to the northwesterly overlook point of the bluff. The slopes established by this plan are steeper than the nearby hillside topography and this plan would allow a flat developable pad for future buildings. The plan allows for less imported fill due to the intended end use of development which will provide spoils from excavations of building footings and future paving areas to be placed as fill to establish terraced development that steps up in elevation as the buildings get closer to the quarry face. The use of future spoils as fills and terracing future development will intentionally create an appearance consistent with typical development seen in Hillside Preservation Districts. Future building heights would also screen the 2:1 slope at the quarry face to soften the appearance and meet SMARA objectives.

Table 1: Rockaway Quarry Reclamation Plan Comparison

Reclamation Plan Year	SMARA Requirements						Flat building pads created by reclamation grading?	Consistent with Coastal Act and other Agency Requirements ?	Blasting, Hammering, and/or Crushing required for majority of earthwork?	Approved Hours for Blasting	Estimated Range of Decibels		Earthworks			
	2770 (a)	2770 (a)	2712 (c)	2712 (c)	3704 (e)	2712 (a)					Min	Max	Quantities			
	Coverage of all disturbed mined lands?	Eliminate eroded and unvegetated mined areas?	Eliminate slopes steeper than 2:1 and mitigate eroded slopes adjacent to trails for safety?	Provide trail that is ADA accessible?	Contours conform to surrounding topography similar to hillside east of the Quarry and creek uplands?	Adapatable for alternative land uses (development) ?							Total earthwork on-site (cy)	Cut (cy)	Fill (cy)	Net
10/28/1996	Yes	Yes	Yes	No	No	Yes	Yes	Unknown	Yes	10am-3pm	100	160	1,414,400 +	707,200	707,200	0
1/22/2016	No	No	No	No	No	Yes	Yes	No	Yes	Unknown	100	160	216,000	108,300	107,700	600 cut
4/5/2023	Yes	Yes	Yes	No	Yes	Yes	No	Yes	No	N/A	N/A	N/A	1,140,000	85,000	1,055,000	970,000 fill
9/1/2023	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	No	N/A	N/A	N/A	1,014,000	70,000	944,000	874,000 fill
6/28/2024	Yes	Yes	Yes	Yes	Complies*	Yes	Yes	Unknown	No	N/A	N/A	N/A	723,000	70,000	653,000	583,000 fill

Note: *Complies as allowed under SMARA Section 2773 to reclaim to a flat development pad as a planned use in lieu of reclamation to a hillside topography of no development as an actual subsequent use.

+ Calera Creek was in a completely different location in the 1996 plan. Subsequent to relocation of Calera Creek, and construction of the City-owned multi-purpose trail, the West parcel acreage was significantly reduced by approximately 30%. This

++ The National Institute for Occupational Safety and Health (NIOSH) provides the following guidance on exposure to noise levels without wearing hearing protection

Noise Level dBA

- [85 dBA](#)
- [88 dBA](#)
- [91 dBA](#)
- [94 dBA](#)
- [97 dBA](#)
- [100 dBA](#)
- [103 dBA](#)
- [106 dBA](#)
- [109 dBA](#)
- [112-118 dBA](#)
- [121-124 dBA](#)
- [127 dBA](#)
- [130-140 dBA](#)
- [140+ dBA](#)

Maximum Exposure Time

- [8 hours](#)
- [4 hours](#)
- [2 hours](#)
- [1 hour](#)
- [30 minutes](#)
- [15 minutes](#)
- [7.5 minutes](#)
- [3.7 minutes](#)
- [1.85 minutes](#)
- [Less than 1 minute](#)
- [Less than 10 seconds](#)
- [1 second](#)
- [Less than 1 second](#)
- [NO EXPOSURE TIME \(threshold of pain\)](#)

Note: All work persons on sight will be required to follow the projects Injury Illness Prevention Plan (IIPP), which of course requires hearing protection. Members of the public, local residents and businesses, and especially pedestrians enjoying the multi-

**ROCKAWAY QUARRY RECLAMATION PLAN
JUNE 28, 2024 CONCEPT SITE PLAN
FOR THE REDUCED FILL ALTERNATIVE
SMARA FINDINGS**

Background Regarding Further Clarifications to Reduced Fill Alternative

The Draft EIR for the Rockaway Quarry Reclamation Plan described a Reduced Fill Alternative. This alternative contemplated that the Reclamation Plan would be designed to use the minimum amount of fill to meet Surface Mining and Reclamation Act (SMARA) requirements but the Draft EIR did not specify a specific amount. The Draft EIR Reduced Fill Alternative was designed to meet the basic project objectives including reclamation to a usable condition, which is readily adaptable for alternative land uses. Even though development is not proposed as an element of the Reclamation Plan, the Reclamation Plan still needs to anticipate how to adapt the Quarry Site to allow future development in order to comply with SMARA.

The Preserve at Pacifica/Baylands Soil Pacifica needs to fill the quarry pit and grade the site to restore wetlands and habitat as part of reclamation. It takes approximately 653,000 cubic yards of fill (583,000 cubic yards of which is imported fill), to do that even with a future effort to implement development as reclamation proceeds (referred to as the “Reduced Fill Alternative”). Without the ability to replace dirt with foundations, reclaiming the Rockaway Quarry requires a lot more dirt as demonstrated by the proposed 2023 Reclamation Plan. The reason is that the amount of fill needed to fill the quarry is driven by the existing topography and not by the type of development that may someday be developed on the Property.

The property owner and applicant are willing to consider sequencing reclamation so that less fill is needed under the Reduced Fill Alternative to reclaim the quarry while the property owner and City engage in a specific plan process for a future development effort consistent with the Pacifica General Plan. The following explains how the Reduced Fill Alternative as reflected in the June 28, 2024 Concept Site Plan meets the findings required under SMARA and the City of Pacifica Municipal Code for the approval of a reclamation plan for the City of Pacifica’s consideration. The findings below adapt the City of Pacifica’s original findings for the Proposed Revised Reclamation Plan dated 9/1/2023 to the June 28, 2024 Concept Site Plan.

SMARA Findings as applied to the Applicant’s Further Clarifications Reflected in the June 28, 2024 Concept Site Plan for the Reduced Fill Alternative

The Rockaway Quarry Reclamation Plan is subject to the requirements established in the SMARA. As stated in Public Resources Code Section 2712, the Legislature’s intent in enacting SMARA was to assure that:

- a) Adverse environmental effects are prevented or minimized and that mined lands are reclaimed to a usable condition which is readily adaptable for alternative land uses;

b) The production and conservation of minerals are encouraged, while giving consideration to values relating to recreation, watershed, wildlife, range and forage, and aesthetic enjoyment; and,

c) Residual hazards to the public health and safety are eliminated.

The Rockaway Quarry Project Reduced Fill Alternative as reflected in the June 28, 2024 Concept Site Plan is consistent with SMARA Sections 2772 or 2773, and the applicable requirements of State regulations (14 CCR Sections 3500-3505 and 3700-3713) as implemented through the Pacifica Municipal Code Section 9-2.07.

SMARA Section 2773 is useful in understanding the significance of the surrounding area topography, while also referring to the consistency of the end uses, when reaching a determination that the June 20, 2024 Concept Site Plan meets the applicable SMARA findings. With respect to the June 28, 2024 Concept Site Plan for the Reduced Fill Alternative, reclamation requires more fill to match existing topography contours for no development versus less fill is needed to create a development pad consistent with the pad outlined in the General Plan Land Use Map Figure 4-7.

“SMARA Section 2773 states:

- (a) The reclamation plan shall be applicable to a specific piece of property or properties, shall be based upon the character of the surrounding area and such characteristics of the property as type of as type of overburden, soil stability, topography, geology, climate, stream characteristics, and principal mineral commodities, and shall establish site-specific criteria for evaluating compliance with the approved reclamation plan, including topography, revegetation and sediment, and erosion control.

SMARA Section further states that:

“These standards shall apply to each mining operation, but only to the extent that they are consistent with the planned or actual subsequent use or uses of the mining site.”

The Reduced Fill Alternative as further refined in the June 28, 2024 Concept Site Plan would address adverse environmental effects and hazards to public health and safety presented by oversteep, un-reclaimed slopes that resulted from past mining activities based on a smaller footprint of disturbance to fill the quarry of approximately 5 acres. The June 28, 2024 Concept Site Plan for the Reduced Fill Alternative would result in a reclaimed site that is adaptable for alternative land uses in the future in accordance with the Pacifica General Plan Land Use Map Figure 4-7 and would be consistent with the intent of SMARA.

Specifically, the Reduced Fill Alternative would be consistent with other technical requirements of SMARA including but not limited to the following:

A. Section 3503(f): Resoiling. When the reclamation plan calls for resoiling, coarse hard mine waste shall be leveled and covered with a layer of finer material or weathered waste. A soil layer shall then be placed on this prepared surface. Surface mines that did not salvage soil during

their initial operations shall attempt, where feasible, to upgrade remaining materials. The use of soil conditioners, mulches, or imported topsoil shall be considered where revegetation is part of the reclamation plan and where such measures appear necessary. It is not justified, however, to denude adjacent areas of their soil, for any such denuded areas must in turn be reclaimed. The Reduced Fill Alternative would necessarily import soil to regrade oversteep slopes and create more gradual slopes ranging from 5:1 to 2:1. Revegetation is proposed across the newly graded areas. The Reduced Fill Alternative as implemented through the June 28, 2024 would not denude adjacent areas of the soil just as was the case with the proposed Reclamation Plan.

B. Section 3503(g): Revegetation. When the reclamation plan calls for revegetation the available research addressing revegetation methods and the selection of species having good survival characteristics, for the topography, resoiling characteristics, and climate of the mined areas shall be used. The Reduced Fill Alternative as reflected in the June 28, 2024 Concept Site Plan similarly would utilize appropriate local, native species for revegetation.

C. Section 3703: Performance Standards for Wildlife Habitat. Wildlife and wildlife habitat shall be protected in accordance with the following standards:

(a) Rare, threatened or endangered species as listed by the California Department of Fish and Game, (California Code of Regulations, Title 14, sections 670.2 - 670.5) or the U.S. Fish and Wildlife Service, (50 CFR 17.11 and 17.12) or species of special concern as listed by the California Department of Fish and Game in the Special Animals List, Natural Diversity Data Base, and their respective habitat, shall be conserved as prescribed by the federal Endangered Species Act of 1973, 16 U.S.C. section 1531 et seq., and the California Endangered Species Act, Fish and Game Code section 2050 et seq. If avoidance cannot be achieved through the available alternatives, mitigation shall be proposed in accordance with the provisions of the California Endangered Species Act, Fish and Game Code section 2050 et seq., and the federal Endangered Species Act of 1973, 16 U.S.C. section 1531 et seq.

(b) Wildlife habitat shall be established on disturbed land in a condition at least as good as that which existed before the lands were disturbed by surface mining operations, unless the proposed end use precludes its use as wildlife habitat or the approved reclamation plan establishes a different habitat type than that which existed prior to mining.

(c) Wetland habitat shall be avoided. Any wetland habitat impacted as a consequence of surface mining operations shall be mitigated at a minimum of one to one ratio for wetland habitat acreage and wetland habitat value. The Reduced Fill Alternative has considered the presence of rare, threatened or endangered species and species of special concern. As discussed in the Reduced Fill Alternative in the Draft EIR, it is not possible to entirely avoid wildlife habitat and man-made wetlands utilized by the identified species that have the potential to be present on the Project site. However, the Reduced Fill Alternative as implemented through the June 28, 2024 Concept Site Plan would restore affected wetlands in excess of 4:1 replacement ratio, even though it would result in an approximate 10% reduction in impacts to wetlands compared to the Project evaluated in the Draft EIR. Revegetation with appropriate local and native species will also help to restore appropriate wildlife habitat on the Project site.

D. Section 3704: Performance Standards for Backfilling, Regrading, Slope Stability, and Recontouring. Backfilling, regrading, slope stabilization, and recontouring shall conform with the following standards:

(a) Where backfilling is proposed for urban uses (e.g., roads, building sites, or other improvements sensitive to settlement), the fill material shall be compacted in accordance with the Uniform Building Code, published by the International Conference of Building Officials and as adopted by the lead agency, the local grading ordinance, or other methods approved by the lead agency as appropriate for the approved end use.

(b) Where backfilling is required for resource conservation purposes (e.g., agriculture, fish and wildlife habitat, and wildland conservation), fill material shall be backfilled to the standards required for the resource conservation use involved.

(c) Piles or dumps of mining waste shall be stockpiled in such a manner as to facilitate phased reclamation. They shall be segregated from topsoil and topsoil substitutes or growth media salvaged for use in reclamation.

(d) Final reclaimed fill slopes, including permanent piles or dumps of mine waste rock and overburden, shall not exceed 2:1 (horizontal:vertical), except when site-specific geologic and engineering analysis demonstrate that the proposed final slope will have a minimum slope stability factor of safety that is suitable for the proposed end use, and when the proposed final slope can be successfully revegetated.

(e) At closure, all fill slopes, including permanent piles or dumps of mine waste and overburden, shall conform with the surrounding topography and/or approved end use.

(f) Cut slopes, including final highwalls and quarry faces, shall have a minimum slope stability factor of safety that is suitable for the proposed end use and conform with the surrounding topography and/or approved end use.

(g) Permanent placement of piles or dumps of mining waste and overburden shall not occur within wetlands unless mitigation acceptable to the regulatory agencies with jurisdiction over wetlands, which may include the lead agency, has been proposed to offset wetland impacts and/or losses. The Revised Project would backfill slope areas in a manner consistent with the recommendations in the geotechnical report titled "Geotechnical Investigation Rockaway Quarry Reclamation, Pacifica, California", dated December 10, 2018, prepared by Geocon Consultants, Inc., and peer reviewed by the City's CEQA consultant, ENGEO Incorporated, for purposes of an intended end use of open space, undeveloped land. All proposed final reclaimed fill slopes will equal to or less than 2:1 slope.

Pacifica Municipal Code Section 9-2.07 Findings

The Planning Commission may approve a reclamation plan only when making all of the following findings:

(1) The June 28, 2024 Concept Site Plan for the Reduced Fill Alternative conforms fully to the provisions of this chapter, the City's general plan, and the Surface Mining and Reclamation Act Sections 2772 and 2773, and shall comply with applicable requirements of State regulations (Sections 3500-3505 and 3700-3713) as may be amended.

The Rockaway Quarry Project Reduced Fill Alternative is consistent with SMARA Sections 2772 or 2773, and the applicable requirements of State regulations (14 CCR Sections 3500-3505 and 3700-3713) as implemented through the Pacifica Municipal Code Section 9-2.07.

(2) The reclamation plan has been reviewed pursuant to the California Environmental Quality Act and the City's environmental review guidelines, and all significant adverse impacts from reclamation of the surface mining operations are mitigated to the maximum extent feasible.

The reclamation plan as reflected in the Reduced Fill Alternative has been reviewed pursuant to the California Environmental Quality Act and the City's environmental review guidelines, and all significant adverse impacts from reclamation of the surface mining operations are mitigated to the maximum extent feasible. The Rockaway Quarry Reclamation Plan Project Draft EIR was prepared in February 2022 pursuant to CEQA. All significant impacts associated with the Reduced Fill Alternative as reflected in the June 28, 2024 Concept Site Plan would be less than those evaluated for the proposed reclamation plan in the Draft EIR and would be mitigated to the maximum extent feasible upon adoption and implementation of the Mitigation Monitoring and Reporting Program (MMRP) of the Final EIR. No environmental impacts were found to be significant and unavoidable.

(3) The land and/or resources such as water bodies to be reclaimed will be restored to a condition that is compatible with, and blends with, the surrounding natural environment, topography, and other resources, to the maximum extent feasible.

The land and/or resources such as water bodies to be reclaimed will be restored to a condition that is compatible with, and blends with, the surrounding natural environment, topography, and other resources, to the maximum extent feasible. The Revised Project includes the following objectives related to the natural surrounding environmental, topography, and other resources:

- Minimize grading to the maximum extent practicable in a manner that is consistent with the other objectives and maintains an average 2:1 slope on Project site. Mitigate and restore prior physical disturbances resulting from past quarrying activity on the Project site. Provide for erosion control measures, land stewardship and maintenance to reduce sediment transport from the Project site into Calera Creek (which drains into the Pacific Ocean) in order to improve the creek's water quality. Restore the Project site to pre-quarry conditions so that views of the Pacific Ocean are maintained in a manner supporting a future alternate use in accordance with SMARA and the Pacifica General Plan.

Grading the Project site to an approximate pre-mining appearance based on historical aerial imagery, revegetating the reclaimed slopes with native vegetation, and installing drainage improvements to manage future stormwater runoff and improve water quality, will all combine in the proposed reclamation plan to ensure that the reclaimed land will be compatible with the

surrounding natural environment, topography, and other resources, particularly the existing undeveloped condition at the adjacent Mori Point area to the north.

(4) The reclamation plan will restore the mined lands to a usable condition that is readily adaptable for alternative land uses consistent with the general plan, local coastal land use plan, California Coastal Act, and Zoning Code.

The June 28, 2024 Concept Site Plan for the Reduced Fill Alternative will restore the mined lands to a usable condition that is readily adaptable for alternative land uses consistent with the general plan, local coastal land use plan, California Coastal Act, and Zoning Code. The Concept Site Plan was prepared pursuant to SMARA and the City of Pacifica Surface Mining and Reclamation regulations (PMC Title 9, Chapter 2). The final condition of the Project site following completion of reclamation would be prepared for future end uses, with slopes ranging from 5:1 to 2:1, resulting in a Project site that would be readily adaptable for alternative land uses consistent with the General Plan and Zoning Code (as noted above, the Project site is not included in the City's Certified Local Coastal Program because it is an area of deferred certification). The proposed reclamation is necessary to achieve the requirements of this finding because the Project site currently contains oversteep slopes that are not suitable for alternative land uses identified in the General Plan and Zoning Code.

(5) Comments from the State Department of Conservation have been received and reviewed. A written response to these comments has been prepared and forwarded to the State Department of Conservation.

Comments from the State Department of Conservation have been received and reviewed. A written response to these comments has been prepared and forwarded to the State Department of Conservation. As noted above, the Applicant revised the proposed reclamation plan in response to comments from the Division of Mine Reclamation (DMR), the part of the Department of Conservation responsible for reclamation plan review



August 6, 2024

Kavitha Kumar, Interim Planning Director
Planning Department
City of Pacifica
540 Crespi Drive
Pacifica, CA 94044

Re: Rockaway Quarry Reclamation Plan, Response to July 30,
2024, CCC email to Stephanie Cervantes, City of Pacifica

Dear Kavitha:

Thank you for sharing the California Coastal Commission's (CCC) July 30, 2024, request for additional information about the Rockaway Quarry Reclamation Project. While the Reduced Fill Alternative in the DEIR was sufficient from a CEQA perspective, it was analyzed at a qualitative level of detail. However, we can use the recently submitted (July 2, 2024) concept site plan for the reduced fill alternative to answer these questions.

1) Explain if and how the Reduced Fill Alternative would change the grading ratios;

a) The July 2, 2024, reduced fill alternative contemplates 583,000 cy of imported fill. This is a 45% reduction of imported fill. In addition, 67,000 cy of material would be cut and moved on-site to complete reclamation under this alternative. This results in a total amount of fill in the pit of 653,000 cy. The proposed 67,000 cy of cut is the maximum amount of fill able to be 'harvested' onsite without requiring blasting rock and installing a rock crushing facility to generate material that is geotechnically suitable for the final reclamation.

2) Clarify how much less fill would be placed in the quarry pit in the Reduced Fill Alternative;

a) The original Reclamation Plan proposed 1,055,000 cy of fill in the quarry pit to return the landform to near pre-mining conditions. The total amount of fill placed in the quarry pit in this reduced fill alternative is 653,000 cy, a 38% reduction of fill. Of the 653,000 cy of fill, 580,000 cy is imported fill (the remaining 67,000 cy is cut and balanced onsite). The reduced fill alternative reduces the amount of imported fill by 45%.



3) Explain how the Reduced Fill Alternative would impact the existing wetlands and the proposed plan for wetland mitigation; and if reduced fill would lessen impacts to the existing wetlands;

a) The reduced fill alternative does result in impacts to the low-quality, man-made wetlands and sediment basin in the quarry pit. However, due to the reduced amount of fill, the amount of wetlands impacted are likely to be able to be reduced. In particular, the fill footprint can be pulled back and away from the creek and associated willows. We believe that impacts to a seasonal wetland in that area avoided. The exact amount of reduced impact can be calculated once this alternative has been refined after further vetting by the approving agencies. Any remaining wetland impacts will be mitigated at a 4:1 ratio as previously proposed and in the same location as previously proposed.

4) Analyze how the Reduced Fill Alternative would differ visually from the proposed preferred project and provide new visual simulations;

a) The reduced fill alternative visually looks relatively similar to the original proposal, but there will be a slightly reduced footprint and a 5-acre relatively flat pad at elevation 85. There will be a 2:1 slope rising from the flat pad up to elevation 135 where it will meet with a stable portion of the existing quarry face. Additional fill will be placed above that face at roughly the 180 elevation contour and extend up to the hilltop (elevation 260) in a 2:1 slope on the east, but a more gradual 3:1 and 5:1 slope in the south and west, respectively.

5) Provide the estimate of greenhouse gas emissions and vehicle miles traveled for the Reduced Fill Alternative, including a comparison to the proposed preferred project;

a) While these numbers have not been formally calculated for this reduced fill alternative, we can make some relative estimates. The VMT will be reduced by a relative amount compared to the reduction in import - an approximately 45% reduction. Greenhouse gas emissions from the import will also be reduced significantly from the originally proposed Reclamation Plan. There will be ~45% reduction of GHG from the reduced import of fill, but there will be additional GHG output from the 67,000 cy of onsite cut/fill proposed to complete reclamation. Therefore, the reduction in GHG emissions will be between approximately 30-40% of the proposed Reclamation Plan.

6) Expand on how the proposed public access trails would be altered by the Reduced Fill Alternative, including specifics of which existing trails would remain with this alternative.

a) The reduced fill alternative proposes essentially the same public access design as the Reclamation Plan. Once the public trail crosses the bridge and enters the West Parcel, the trail splits with one fork going left, rising gently to an overlook while the other splits to the right and courses up the east side of the hill to connect with the existing trail at the 'hilltop'. This is



consistent with the public access proposed in the Reclamation Plan.

Additionally, a few new questions/comments have come up for us during the review of the submittal, including:

7) Please clarify why a proposal for future development on the site would require less fill than if the Quarry remained open space.

- a) While the original Reclamation Plan proposal had a designated SMARA end use of Open Space, it also left the site in a manner that was usable for a variety of future uses. This configuration also aligned with the City's General Plan designation which allowed for 7.8 acres of Visitor Serving Commercial use on the West Parcel. The July 2, 2024, reduced fill alternative reduces the size of the pad that may be used for future uses on the West Parcel to 5 acres. The difference is less about end use designation and more about the amount of space usable for a variety of subsequent uses following reclamation.

I hope this information is helpful. Please don't hesitate to contact our project team if you have any clarifying questions.

Sincerely,



Geoff Smick
Principal/CEO

