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July 2, 2024

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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

Dear Kavitha and Stefanie:

As you know, Buchalter, APC, represents Paul Heule and 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 Preserve and Baylands appreciate the public and Planning Commission’s recent deliberations at the May 20, 2024 Study Session concerning the proposed Reclamation Plan and associated land use approvals referenced as File No. 2016-001.

The purpose of this letter is to supplement our prior submittals and address the Planning Commission’s comments regarding the proposed Reclamation Plan and again explain how the applicant approached the reclamation effort with an objective of further lessening the amount of imported fill. Our prior letter dated May 9, 2024, as well as our prior submittals from October 2023 are hereby incorporated by reference as many of the questions from the Planning Commission were addressed in the May 9, 2024 Letter and our prior application materials.

There is No “No Imported Fill” Option

The State Mining and Reclamation Act of 1975 (“SMARA”) governs the Reclamation Plan. As we explained at the prior Planning Commission meetings and in our application submittals, surface mining operations are required to prepare and file a reclamation plan for closed mines. (Pub. Res. Code, § 2770.) Mining at the Rockaway Quarry resulted in an internal

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bowl open to the east with adjoining bluffs to the west fronting the ocean. On the eastern (internal) side of those bluffs, mining left near-vertical rock faces, about 140 feet in height from the quarry floor to the shear zone on the main face and 60 feet in height from the sheer zone to the hilltop as described in the 2023 Reclamation Plan. To match the existing topography and, therefore, restore the hillock that once occurred on the Quarry site requires creating a rounded, naturalistic landform. This work requires 944,000 cubic yards of fill, as shown in the applicant's proposed Reclamation Plan which is focused on leaving the site in a natural condition (see the John Zentner Land Planning and Restoration, LLC Memorandum entitled "Pacifica Quarry Fill" attached hereto and incorporated herein as **Exhibit A** ("Zentner Memorandum").

Mr. Heule however, has attempted to further reduce the amount of fill necessary to fill the quarry. There is *no* "no fill" option because the quarry pit must be filled with something to reclaim it in accordance with SMARA. To identify other lower fill options, Walsh Engineering, the project engineer, evaluated the General Plan's designation for the Quarry Site. The General Plan designates the project site as a 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 hereto and incorporated herein as **Exhibit B** ("Walsh Memorandum"). Reclaiming the site for General Plan consistent- uses trades off restoration of a natural hillslope for creation of a potential development site consistent with SMARA.

Development Pad with Reduced Fill Option

The applicant's original Reclamation Plan proposed 1,055,000 cubic yards of fill in order to match the existing topography and meet SMARA's requirements as explained in Exhibit A. The applicant team then reduced the amount of fill to 944,000 cubic yards in the October 2023 Revised Reclamation Plan. In response to comments and questions from the Planning Commission at its March 18, 2024 Public Hearing, the applicant team once again lowered the 944,000 cubic yards to 653,000 cubic yards by replacing imported fill with a pad consistent with General Plan land uses as explained at the May 20, 2024 Study Session. Even with these reductions, the Commission asked if the amount of imported fill could be further lowered.

The surrounding topography imposes a physical constraint in generating fill on site. **Exhibit B** summarizes 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

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developed with General Plan land uses in the future, which represents about 64% of the 7.8 acre pad area shown on the General Plan Figure 4-7 as shown on the next page.

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. As it is, the proposed modest topographic alteration contemplated with the proposed Reclamation Plan at 944,000 cubic yards necessitates a variance in order to comply with the allowable coverage area under the HPD. Removal of the hilltop¹ to generate more onsite fill to balance the 653,000 cubic yards, for example, would expand the coverage area by another estimated 5 acres which would result in an even greater conflict with the HPD ordinance.

Further Clarifications to Reduced Fill Alternative

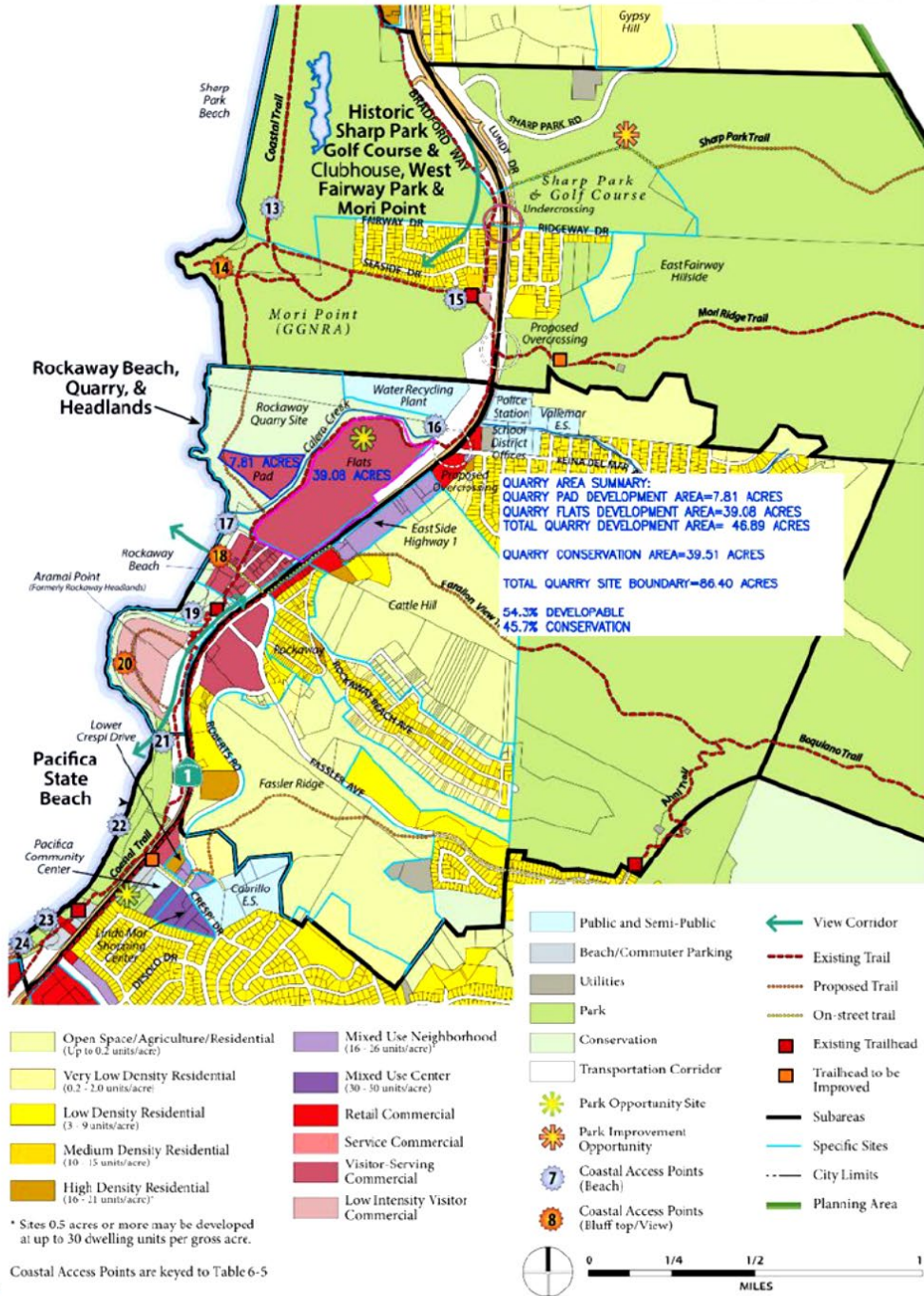
The Reduced Fill Alternative described in the Draft EIR contemplated that the Reclamation Plan would be designed to use the minimum amount of fill to meet SMARA requirements but the Draft EIR did not specify a specific amount. The Draft EIR Reduced Fill Alternative was designed to meet the basic project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

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.

¹ Prior geologic investigations were conducted in conjunction with the 1996 and 1998 Reclamation Plans that demonstrated that removing the hilltop would require some combination of blasting, hammering, and excavation.

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Figure 4-7: Pacifica, Central



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Approval of Reclamation to allow time to Plan for Future Development does not Constitute Piecemealing

Some commenters suggested at the Study Session that the City is required to conduct environmental review in one document for *both* the reclamation portion of the Project *and* future unknown development to comply with the California Environmental Quality Act (“CEQA”). The purpose of this letter is to explain why CEQA does not require that the City evaluate unknown, speculative future development as part of the Reclamation Project.

Generally, CEQA defines a “project” as “an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment,” and includes an activity “that involves the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.” (Pub. Res. Code, § 21065.) Meanwhile, the CEQA Guidelines (contained in Title 14 of the California Code of Regulations) further clarify this definition, explaining that a “project” is “*the whole of an action*, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” (CEQA Guidelines, § 15378(a) (emphasis added).) The “term ‘project’ refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies” but “does not mean each separate governmental approval.” (CEQA Guidelines, § 15378(c).)

As with most State and Federal environmental laws, CEQA, however, only requires an analysis of *reasonably foreseeable* future actions, not those that are speculative. CEQA requires environmental review of all phases of a project “that will foreseeably result from project approval.” (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 396.) However, courts have opined time and time again that environmental review need not analyze speculative and unknown activities. For example, the Laurel Heights Court held that an EIR does not need to evaluate a “specific future action that is merely contemplated or a gleam in a planner's eye.” (*Id.* at p. 398.) “A detailed environmental analysis of every precise use that may conceivably occur is not necessary at this stage.” (*Id.*) See also the Court of Appeal’s decision in *Center for Biological Diversity v. County of San Bernardino* (2016) which held that an EIR need not analyze the potential for pumping of groundwater *after* the expiration of a 50-year term because any extension was speculative. (247 Cal.App.4th 326, 332, 350.) Also see, *Berkeley Keep Jets Over the Bay Committee v. Board of Port Cmrs.* (2001) 91 Cal.App.4th 1344 which held that an airport EIR need not include future projects that “existed only as concepts in long-range plans that were subject to constant revision.” (at p. 1361). Similarly, the Court in *National Parks & Conservation Assn. v. County of Riverside* (1996) 42 Cal.App.4th 1505 held that a landfill EIR need not analyze the potential for future processing plants because “their exact locations to serve the project are unknown at this time” and it was not known who will be operating them. (at pp. 1518-19.) Undertaking the analysis of those impacts at that time

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“would involve speculation and conjecture.” (at p. 1519.) These cases are no different than the unknown future of the Rockaway Quarry site.

Mr. Heule does not have any plans for development of his property. Property owners and developers, and Mr. Heule, himself, have tried for over 30 years to develop the Rockaway Quarry site to no avail. The last time that development was proposed in 2018, the voters rejected it just like they did in prior decades. Development is speculative at best. 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 Mr. Heule to engage in a planning process to determine what future development could look like. This is not piecemealing. It is buying time for a collaborative planning process as the adopted General Plan envisions.

Quality of Fill Material

We would also like to respond to public comment letters received prior to our last May 20, 2024 Study Session related to Soil Testing and Environmental Screen Levels that we provided in the Reclamation Plan and technical reports. As we stated in our October 2023 materials and offered in response to comments at the March 18, 2024 Public Hearing and May 20, 2024 Study Session, all of the soil sampling, testing, procedures, and methods provided in the Reclamation Plan, as amended and submitted to the City in October 2023, meet and exceed soil testing requirements as provided by the Department of Toxic Substance and Control, and State and Federal regulations. Furthermore, the amended soil management plan (dated October 2023) attached to this letter as **Exhibit C** provided confirmation testing procedures that could be facilitated by the City, at its own discretion, subject to reimbursement by the Project applicant. Therefore, there is no merit to any of the comments made with respect to soil testing included in the comment letters provided to the City before the May 20, 2024 hearing.

Next Steps

As Mr. Heule stated at the May 20, 2024 Study Session, he 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 amount of imported fill to reclaim the Quarry Site subject to compliance with SMARA. The Reclamation Plan approval could then be conditioned to be implemented over the next three years as development plans progress.

We propose the following condition for the City’s consideration, if the City is interested in proceeding with the Reduced Fill Alternative evaluated in the Draft EIR and shown in the attached “Preliminary Concept Plan Illustrating Reduced Fill of the Development Area Shown on the General Plan Figure 4-7” attached as **Exhibit D** to this letter (hereinafter, the “Preliminary Grading Plan”):

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- The City could condition the selection of the Reduced Fill Alternative so that the property owner/applicant may fill the quarry as shown in the Preliminary Concept Plan up to a maximum of 583,000 cubic yards of imported fill. The applicant/property owner will agree to implement the Reclamation Plan in accordance with the Preliminary Concept Plan and limit the amount of imported fill material in a phased manner. After the necessary permits and authorizations are obtained to initiate reclamation, the applicant/ property owner would limit the amount of imported fill to 100,000 cubic yards in each of the first two years as the planning process is underway. Once the draft specific plan is released for public review, the applicant/property owner would be allowed to import fill for another 200,000 cubic yards until the Specific Plan is approved. If the Specific Plan is approved by 2027, then the applicant/property owner will limit the amount of imported fill to a total of 400,000 cubic yards provided that sufficient fill material can be generated on site to fill the quarry so that development of the future end uses contemplated in the General Plan may proceed after reclamation. In the event, the Specific Plan is not approved by 2027, then the applicant/property owner will be allowed to complete the reclamation of the quarry at the maximum of 583,000 cubic yards of imported fill. If the City selects the Reduced Fill Alternative as shown in the Preliminary Concept Plan and the Specific Plan proceeds, then the applicant/property owner will revise the adaptive management plan (submitted in October 2023 and Page 15 Table 1), to limit import fill in accordance with the phasing of the Reclamation Plan set forth in this condition.

Under this alternative, Mr. Heule and Mr. Gilmartin are willing to revise the October 2023 adaptive management plan to reflect the Preliminary Concept Plan so that the City can maintain the flexibility it needs to modify the total import fill quantities required for reclamation and future development, as approved by the specific plan process. As long as the planning process is underway and the City of Pacifica and the community approve the specific plan for development by the time that Baylands has imported 400,000 cubic yards of material to fill the portions of the Quarry Site proposed for development, then the maximum amount of fill under the Reclamation Plan will never be realized. If development is never approved as has been the case since 1983, then to comply with SMARA and other regulatory agencies, Mr. Heule may have no choice but to finish the Reclamation Plan at the maximum amount of fill contemplated by the Reduced Fill Alternative. If development consistent with the General Plan is approved and implemented in the future then the amount of fill necessary to reclaim the Quarry Site will be closer to the minimum.

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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

Exhibit A

John Zentner Land
Planning & Restoration LLC



Pacifica Quarry Fill

The proposed reclamation project at the Quarry is driven by the requirements of the State Mining and Reclamation Act (SMARA), which requires that all mines be reclaimed once they have ceased production.

Mining at the Quarry resulted in an internal bowl open to the east with adjoining bluffs to the west fronting the ocean. On the eastern (internal) side of those bluffs, mining left near-vertical rock faces, about 140 feet in height from the quarry floor to the shear zone on the main face and 60 feet in height from the sheer zone to the hilltop. The relevant SMARA criteria and their applicability to the Quarry site are as follows:

2712 (c) Residual hazards to the public health and safety are eliminated. The Quarry includes heavily used trails on the bluff faces looking out over the ocean. These trails are directly above the Quarry face and a misstep from one of these trails would and has sent people over the edge of the face. The California Coastal Act protects existing access, thus these paths cannot be eliminated. Accordingly, the internal Quarry cliffs must be modified to eliminate the existing safety hazard to these trails.

3704 (d) Final reclaimed fill slopes...shall not exceed 2:1 (horizontal:vertical). To reclaim the near-vertical cliff faces with 2:1 slopes requires a substantial amount of fill; the cross-sections provided as part of the Reclamation Plan provide the best illustration.

3704 (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. The current proposed end use is described in the Reclamation Plan as:

The end use for the reclamation work is open land. As used here, this refers to an open space condition without unsafe or hazardous site conditions. This will require grading to create safe slopes, installation of local drainage facilities to ensure erosion control, and re-vegetating the site to achieve a character that is relatively natural in appearance.

To match the existing topography and, therefore, restore the hillock that once occurred on the Quarry site requires creating a rounded, naturalistic landform. This work will require 944,000 CY of fill, as illustrated in the applicant's proposed Reclamation Plan.

The General Plan designates the project site as a Special Area. The existing zoning designation for the site is Visitor Serving Commercial, which includes a variety of commercial and other uses. Most of these 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 CY (the reduced fill option). Reclaiming the site for General Plan consistent uses essentially trades off restoration of a natural hillslope for creation of a potential development site. Both end uses would be consistent with SMARA (see 3704, cited above).

With regards to imported fill versus generation of fill from cut on-site, approximately 70,000 CY can be generated from on-site materials. Accordingly, the 944,000 CY of fill noted above for the proposed Reclamation Plan would include 874,000 CY of imported fill. For the reduced fill option, the use of on-site fill would reduce the needed import to 583,000 CY.

Reduced amounts of fill are not practicable at this time. Increasing the amount of on-site fill generated would necessarily require grading down and/or blasting the coastal bluffs to generate fill. Pursuing this option is highly speculative as grading the coastal bluffs would be inconsistent with provisions of the California Coastal Act and the City's Hillside Protection District (HPD).

Section 30251 of the Coastal Act states,"The scenic and visual qualities of coastal areas shall be considered and protected Permitted development shall be sited and designed tominimize the alteration of natural land forms"

Similarly, grading the coastal bluffs further would create significant issues with the City's HPD.



MEMORANDUM

Date: 6/21/2024

**Subject: Rockaway Quarry Reclamation Plan
Technical Responses to Items Noted in the May 20th, 2024 City Study Session**

Questions were raised at the May 20th, 2024 Study Session for the Rockaway Quarry Reclamation. This letter is intended to be a response to the technical portion of questions raised in relation to the civil engineering.

Minimum Amount of Fill

SMARA Section 3704(e) states all fill slopes shall conform with the surrounding topography and/or approved end use. If the approved end use is open space without flat development pads, the minimum amount of fill necessary to reclaim the Quarry is 944,000 cubic yards in order to comply with SMARA Section 3704(e). If the approved end use is to include flat development pads, the minimum amount of fill necessary to reclaim the Quarry is 653,000 cubic yards. Both of these amounts of fill result in restoring the Quarry face with fill up to the elevation of the 135 foot contour. Hiking trails exist above the 135 foot contour. Immediately below the 135 foot contour, there are near vertical mining cuts, visible eroded slopes, and a visible lack of vegetated cover which has resulted in significant erosion and instability. We previously submitted a plan exhibit dated 4/24/2024 overlaying the Reclamation Grading Plan on top of an aerial image which depicted the 135 foot contour elevation in relation to proposed grading and the existing issues described above. We also previously submitted a Technical Memorandum dated 11/14/2023, further revised and resubmitted with date 4/9/2024, which outlined specific SMARA Requirements in addition to Section 3704(e) noted above, which guided the proposed reclamation in regard to areas disturbed by mining, adaptability, public health & safety, water quality, watershed control, slope steepness, and accessibility.

Development Pad with Reduced Fill Option

The reduced amount of fill associated with the flat development pads described above does not rely on any specific type of development in terms of 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 developable area. The current General Plan Figure 4-7 indicates approximately 7.8 acres of pad area for development. Therefore, the reduced fill option would result in about 64% of the development area when compared to the pad outlined in the General Plan Figure 4-7.

Hillside Preservation District (HPD)

The City's provisions for the Hillside Preservation District (HPD) guide the maximum amount of coverage area allowed to be disturbed with reclamation or development. Removing more of the Hill Top will result in an increase of the grading limits for disturbed area, thus the allowable coverage area for HPD Requirements will be further exceeded.

Sincerely,

Matt Walsh, PE, QSD/P

Walsh Engineering

References: As noted above; Copy To: (Walsh Engineering File)

Exhibit C
Soils Management Plan Update



BAYLANDS PACIFICA
RECLAIM | RESTORE

October 20, 2023

CHRISTIAN MURDOCK, AICP
PLANNING DIRECTOR
CITY OF PACIFICA | PLANNING DEPARTMENT
540 Crespi Drive, Pacifica, CA 94044
Phone: (650) 738-7341 | cmurdock@pacifica.gov

RE: Responses to Soil Testing Comments for Rockaway Quarry Reclamation Project in Pacifica, CA

Mr. Murdock,

In the original quarry reclamation application documents, Baylands Pacifica (BSP) provided a Soil Management Plan (SMP) dated November 2019, and Updated in September of 2021. Subsequent to the June 5, 2023 hearing, BSP has updated the SMP. Please find the updated SMP, dated October 2023, attached to this letter.

The updates to the SMP address comments we received from Planning and public comments received by City Planning. This letter summarizes our responses to comments received on the Rockaway Quarry Reclamation Project at the June 5, 2023 Planning Commission Meeting, and addresses changes incorporated into the SMP.

1. Heightened Soil Testing

The soil management plan included in our application documents provide for testing procedures, frequency, sampling, and analysis in accordance with DTSC guidelines. In the June 5, 2023 hearing City Planning asked if we would allow the City, and/or its representatives, to perform additional testing of imported soil on site, so as to confirm that import soil meets the acceptance criteria established in the Soil Management Plan. Please let this letter serve as confirmation that BSP agrees to allow the City and its representatives to collect and test soil samples from the project to confirm imported soil meet the requirements set forth in the Soil Management Plan throughout the duration of the Reclamation project. BSP agrees to reimburse the City for its costs incurred to performing "heightened soil testing", for a total of 4 test events per year (one test per quarter).

BSP requests the City follow these steps, when performing on-site confirmation testing.

1. Provide 10-day written notice to the Applicant of an on-site sampling activity, so as to allow for coordination on site, and to ensure BSP can provide safe access to the City and its representatives.
2. Locations of Soil Samples taken by the City and its representatives will be recorded by BSP and the City and its representatives using GPS instrumentation, with sub-meter



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- accuracy. GPS coordinates will be recorded in the Chain of Custody forms associated with each sample.
3. The amount of samples taken will adhere to BSP Environment and Geotechnical Submittal Guidelines for Borrow Sampling (Ref. Section 2 of the BSP Environmental and Geotechnical Submittal Guidelines)
 4. Soil samples will be tested per Section 4 of the Soil Management Plan by an ELAP accredited laboratory.
 5. Test results will be shared with BSP within 5 business days of receipt.

If confirmation testing shows a sample of soil exceeds the acceptance criteria provided within the Soil Management Plan, then BSP will perform additional testing on-site to establish the limits of non-compliant soil. Once the limits of non-compliant soil have been identified then BSP will remove non-compliant soil, transport and dispose of material at an off site disposal location in accordance with all local, state, and federal regulations.

2. Fungi Testing in Soil

The revised October 2023 Soil Management Plan requires all import soil to be screened for 1) Sudden Oak Death Fungi, and 2) Valley Fever Fungi. Any prospective import soil which tests positive for either Sudden Oak Death or Valley Fever Fungi, will be issued a Soil Rejection Letter from BSP, and therefore will not be allowed on-site.

Please feel free to contact me if you have any questions regarding this letter, or changes reflected in the attached Soil Management Plan.

Sincerely,

Billy Gilmartin

SOIL MANAGEMENT PLAN

for the

The Preserve @ Pacifica, LLC

AMENDED RECLAMATION PLAN

**at the Pacifica Quarry
Pacifica, California**

Prepared by:

Baylands Soil Pacifica, LLC

Created: November 2019

Updated: September 2021

Updated: October 2023

1 INTRODUCTION

1.1 Purpose & Objectives

This Soil Management Plan was prepared to define the operations associated with completing the Approved Amended Reclamation Plan (the Facility) at the Pacifica Quarry site, identify operational requirements and limitations, and establish a reporting mechanism between the Operator (Baylands Soil Pacifica, LLC aka “BSP”), land owner (The Preserve @ Pacifica, LLC aka “PAP”) and those governmental agencies with jurisdiction over the site and its operations.

The operation of the reclamation site (Facility) is an evolving process that must adapt to market conditions, and regulatory requirements. Likewise, this plan will serve as an evolving document taking into consideration those changes and will be updated, as needed.

The objectives of this Soil Management Plan are as follows:

- Identify the physical limits of operations at the Pacifica Quarry site under contractual control of the Operator. Under the direction of the landowner, the Operator is directly responsible for the daily operations and implementation of certain regulatory requirements as contractually obligated.
- Provide a description of the operations including site improvements, acceptable import materials, placement and compaction, final grading and vegetation per the Approved Amended Reclamation Plan.
- Establish standardized reports and distribution procedures.

1.2 Site Location & Map

The Pacifica Quarry site consists of APN # 180-150-110 and APN # 180-150-120 (the “West Parcel” shown as Exhibit A) together with APN # 180-150-150 (the “East Parcel” shown in Exhibit B), collectively described as the “Property”. It is bounded by Rockaway Beach to the south, Mori Point Ridge to the north, Highway 1 to the east and the Pacific Ocean to the west in the City of Pacifica within San Mateo County, California. The Project Area consists of the West Parcel (Exhibit A) and existing access roads crossing the east parcel as shown in Section 1.7.

1.3 Site History & Context

The Pacifica Quarry, an open pit mine from which limestone, greenstone, shale and chert was extracted, is located on the Property. Mining operations at the Pacific Quarry ceased in 1987, and the Property requires reclamation. The Project Team has prepared and submitted to the City of Pacifica (“City”), revisions to an application for a Quarry Use Permit and an amendment to Reclamation Plan for the Property

(collectively, the “Amended Reclamation Plan”) pursuant to the Surface Mining and Reclamation Act (“SMARA”) and the City’s Mining and Reclamation Ordinance. The Amended Reclamation Plan will be subject to environmental review under the California Environmental Quality Act (“CEQA”).

As part of the Amended Reclamation Plan, a grading plan (the “Grading Plan”) was prepared by Walsh Engineering dated 03/16/2020. As shown on the Grading Plan, approximately 970,000cubic yards of soil imports are required to reclaim the West Parcel.

As the Contractor, BSP will reclaim the Property by (i) receiving, managing, and placing imported soil to the Property that satisfies certain environmental standards that will be set forth in this Soil Import Management Plan (the “Soil Management Plan”), (ii) depositing and compacting the Imported Soil, (iii) grading the Property, (iv) constructing a new access road on the Property, and (v) re-vegetating the Property. There is no proposal to develop the Property following the completion of the reclamation work at this time.

1.4 Owner’s Name and Address:

The Preserve @ Pacifica, LLC
231 W. Fulton St.,
Grand Rapids, MI 49503
Attn: Paul C. Heule
Email: Pcheule@eenhoorn.com

1.5 Contracted Operator’s Name and Address:

Baylands Soil Pacifica, LLC
600 Castro Street, San
Leandro CA 94577
Attn: Bill Gilmartin
Email: bgilmartin@baylandspacifica.com

1.6 Current Conditions

The Property is a former mine dominated by often-steep slopes, non- native plant species and informal accessways. For ease of discussion, the site includes the following elements from roughly north to south: the Hilltop (the high ground on the north edge of the parcel); the East Flank (the hillside comprised mostly of old quarry debris on the east slope of the parcel); the Quarry Face (the scarp left by mining in the parcel center), the Quarry Pit (the bowl remaining in the bottom of the old quarry),and the Southern Bluff (the old edge of the Quarry on the south adjacent to the ocean).

The Hilltop is the high ground of the parcel and is located above the Quarry Face and East Flank and south of the adjacent Golden Gate National Recreation Area’s

(GGNRA's) Mori Point. The Hilltop is relatively flat and smooth and extends down over the south slope to a shear zone just above the limestone of the Quarry Face. The hilltop also has two mounds protruding approximately 20 feet above the surface. In contrast with its adjacent landscapes, the surface of the Hilltop has soil and moderate vegetation cover.

The East Flank is steeply sloped and is comprised predominately of exposed fill and gains approximately 220 feet in elevation. At the bottom of the East Flank an old access road cuts across and up the slope. The road cuts north across the East Flank and then turns south and continues across the Face. The grade of the slope varies throughout the section with several small, relatively flat, plateaus. The section is moderately vegetated; the lower slope is dominated by pampas grass while the upper, more stable slope contains a variety of native coastal shrubs.

The Quarry Face is predominately an exposed limestone face with approximately 170 feet in elevation gain. The lower two thirds of the Face are steep, comprised of exposed limestone, and are sparsely vegetated. Approximately 120 feet above the old quarry floor, two thirds of the way up the Face, an old access road cuts horizontally across the Face. Above the road, the Face gives way to the Hilltop at the geologic shear zone that separates the limestone from greenstone. The access road and upper slope have moderate vegetation cover.

The Quarry Pit is predominately flat and vegetated with non-native species. Steep slopes, including the Face, surround the Pit to the north, west, and south. To the east, the Quarry Pit abuts the City -owned parcel and Calera Creek. An approximately 7,800 square foot, 10-foot-deep depression is located near the eastern edge. North of the depression is an elevated, predominately exposed rock surface.

The Southern Bluff abuts the Pacific Ocean to the south, is steeply sloped, and is comprised on the surface of predominantly exposed and unstable rock slopes. The slopes are sparsely vegetated with pampas grass. The ridge has moderate vegetation cover comprised of predominately non-native species.

1.7 Site Access

Inbound trucks will come from the north and access the project site from southbound State Route 1 through the Old Quarry Road connection, an existing dirt access road located about one-third mile south of Reina Del Mar Avenue; this access point is currently blocked by large boulders that would be removed as part of the access plan. Vehicles egress from the site would be accommodated at the existing traffic signal at State Route 1/Reina Del Mar Avenue; trucks will turn left onto State Route 1 and return to the north via Interstate 280.

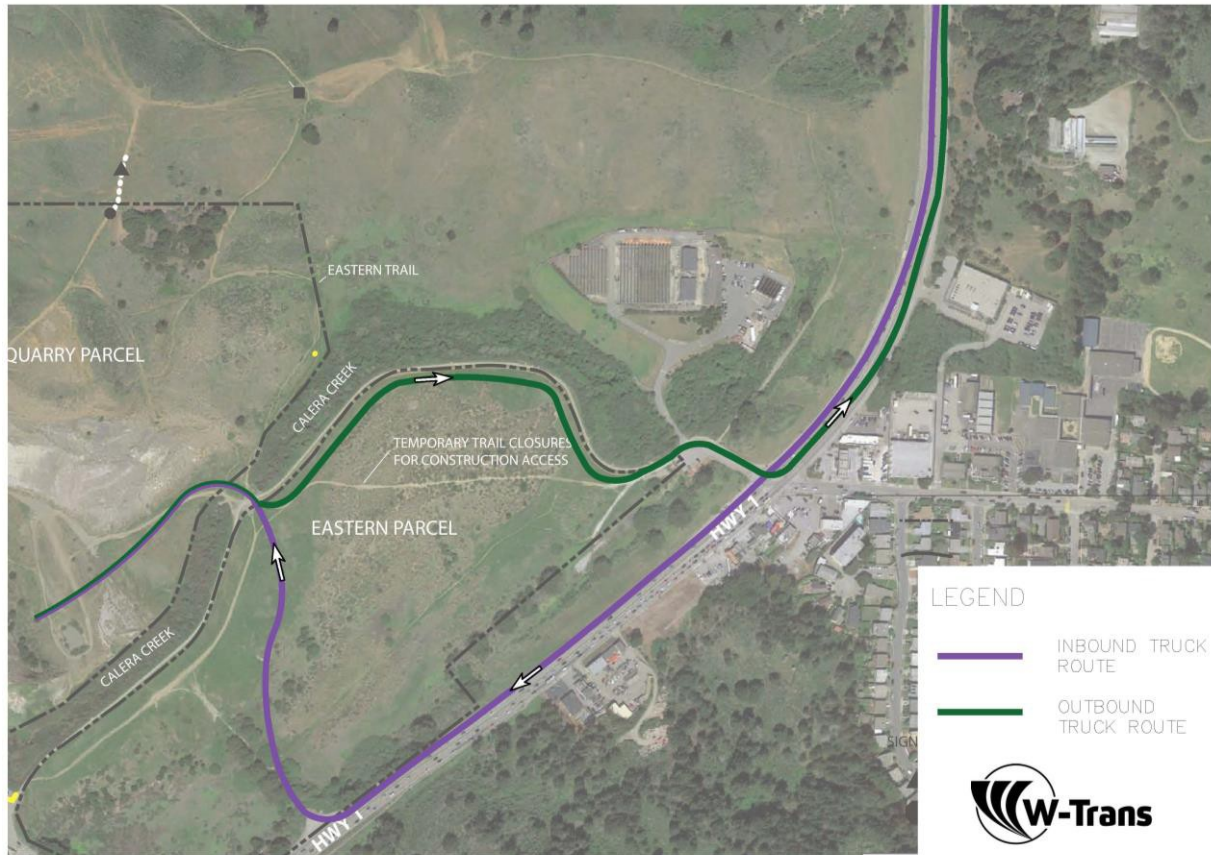


Exhibit 1– Truck Routes

PAC005

December 2018

1.8 Site Drainage

Site drainage is characterized by sheet flow across the unimproved surface of the Property and will be controlled by vegetated swales/channels and other approved Storm Water Pollution Prevention measures. In general, storm water flows to Calera Creek that divides the Property. This central drainage channel also receives storm water discharge from the wastewater treatment plant and other off-site developed areas upstream of the Property. Calera Creek discharges to the Pacific Ocean via Rockaway Beach.

2 DESCRIPTION OF OPERATIONS

2.1 Overview of Operations

The Facility's operations geographically consist of approximately 28.2 acres of the Quarry Site located west of the existing creek. Access to the site will be as stated in Section 1.7.

The Facility accepts "Soil" that does not exceed the environmental screening limits as defined by the State of California Water Quality Control Board - San Francisco Region. Days and hours of operation are Monday through Friday, 6:00 AM to 7:00 PM. If requested by clientele, the Facility may be opened on the weekend during specific hours to accommodate their project's needs.

The Facility requires that materials go through an Environmental Screening Process (ESP) prior to being accepted as suitable import materials. The Environmental Screening Limits (ESL's) for the chemicals being evaluated align with the Regional Water Quality Control Board's (RWQCB) residential ESL's and generally accepted background levels previously accepted by the RWQCB and the State Department of Toxic Substance Control (DTSC).

Additionally, the materials must meet the requirements contained in the Geotechnical Investigation Dated December 2018 by Geocon, which includes: a Plasticity Index not greater than 20, and an Expansion Index less than 90 to ensure the materials comply with the project's structural fill and compaction requirements.

In October of 2023, this plan has been updated to include testing for fungi. All soil proposed for import to the site, must be tested for Sudden Oak Death and Valley Fever Fungus. Any proposed import soil showing presence of Sudden Oak Death or Valley Fever Fungus will be rejected, and therefore not allowed for import to the site.

Once approved by the Materials Regulation Specialist (MRS), a list of approved projects will be given a designated, unique identification number by the Operator and given to BSP's Gate Operator and PAP's designated representative. Quantity and timing of material deliveries are dependent on the individual project and vary daily.

When deliveries arrive at the Facility, the Gate Operator will check them against the "approved list" to confirm compliance with the prior approvals. If the Gate Operator determines that the import materials are not associated with the "approved list" or appears to have been tampered with, the Gate Operator will reject the load.

2.2 Related On-Site Operations

Proposed activities include the following:

1. Administrative office and related equipment in a temporary modular unit;

2. Heavy Equipment storage and maintenance; (2) screening plants, (2) loaders, (1) excavator, (1) water truck, (1) tractor, and (2) pick-up trucks, as needed;

3. Miscellaneous tools and equipment including lab equipment, tool box containers, power generator;
4. Vehicle parking – ranging between 3 to 6 vehicles;
5. Implementation of the Site's Storm Water Pollution Prevention Plan (SWPPP);
6. Site grading and maintenance of SWPPP measures and access road,
7. Temporary stockpiling of soil prior to placement and compaction;
8. Temporary storage and off-haul of site generated debris which includes debris boxes.
9. Temporary storage of BSP's, and its representatives, construction equipment, miscellaneous tools in containers and various framing and structural support materials.
10. Revegetate the Property in accordance with the Approved Amended Reclamation Plan

2.3 Source for Imported Materials.

The sources of imported soil would be from public works projects and soil excavation associated with private development projects located in San Francisco, San Mateo, and Santa Clara Counties. The source materials to be received on the project site would be limited to these three counties in order to 1) conduct reclamation activities within the anticipated schedule, and 2) limit total greenhouse gas emissions based on accessibility to regional transportation facilities between the source locations and the project site consistent with the Reclamation Project Application.

3 REGULATORY REQUIREMENTS

The following section identifies those entities that have regulatory jurisdiction over the operations of the Facility as they apply to the Project Site. Sections 3.1 through 3.5 are specific to the primary operations pertaining to importing, processing and exporting soil.

3.1 City of Pacifica

The City of Pacifica has ultimate permitting authority of the site. In accordance with Pacifica Municipal Code (PMC) Chapter 2 entitled "Quarries," consisting of sections 9-2.01 through 9-2.17 codified from Ordinance No. 365, as amended by Ord. 151-C.S. eff. August 13, 1975, Ord. 349-C.S., eff. November 10, 1982, and Ord. 414-C.S., eff. August 8, 1984), the Project's Operating Permit will comply with the City approved Amended Reclamation Plan and requirements outlined in the Projects certified EIR.

3.2 Regional Water Quality Control Board (RWQCB)

The site is required to comply with the Order issued by the Regional Water Quality Control Board - San Francisco Bay Region and State of California's General Storm Water Permit associated with Industrial Activities.

3.2.1 General Storm Water Permit associated with Industrial Activities Requirements Applicable to the Operator

The site is required to comply with the California's General Storm Water Permit associated with Industrial Activities which generally requires facility operators to:

1. Eliminate unauthorized non-storm water discharges;
2. Develop and implement a storm water pollution prevention plan (SWPPP); and
3. Perform monitoring of storm water discharges and authorized non-storm water discharges.

This General Permit requires development and implementation of an SWPPP emphasizing the use of BMPs. This approach provides the flexibility necessary to establish appropriate BMPs for different types of industrial activities and pollutant sources. As this General Permit covers vastly different types of facilities, the State Water Board recognizes that there is no single best way of developing or organizing an SWPPP.

A Notice of Intent in conformance with the California National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges associated with industrial activities was filed on on behalf of the current reclamation activities. A

storm water pollution prevention plan (SWPPP) that incorporated best management practices (BMPs) was submitted to the California State Water Resources Board (State Board).

The State Water Resources Control Board, Division of Water Quality issued a Waste Discharger Identification (WDID) number prior to site operations.

3.3 United States Army Corp of Engineers (USACOE)

PAP received a Nationwide Permit from the Department of the Army authorizing the filling of Pacifica Quarry site. Mitigation shall be completed in accordance with the Permit.

3.4 California Air Resources Board (CARB)

On July 26, 2007, the California Air Resources Board (CARB) adopted a regulation to reduce diesel particulate matter (PM) and oxides of nitrogen (NOx) emissions from in-use (existing) off-road heavy-duty diesel vehicles in California. Such vehicles are used in construction, mining, and industrial operations.

As required by the In-Use Off-Road Diesel Regulation, CARB requires that off-road heavy-duty diesel vehicles are registered using CARB's Diesel Off-Road On-Line Reporting System (DOORS). This program provides a public database which includes CARB certification by an Executive Order that the equipment is in compliance with all regulatory standards.

Operator's current equipment is registered with the DOORS program and all proposed equipment will be registered to ensure compliance.

4 STORM WATER POLLUTION PREVENTION PLAN

4.1 Baseline Conditions

The majority of best management practices implemented on site include, but not limited to: silt fences, check dams, vegetated non-operational/undisturbed areas and drainage swales. The site is watered twice a day for dust control. For vehicles exiting the site, a wheel wash and rumble strips are installed adjacent to the portable trailer.

SWPPP BMP's are proactively updated and corrected, as needed. Working with PAP, the Operator will ensure proper monitoring and reporting per the existing SWPPP. Erosion control measures (e.g., hydro-seeding) are applied to undisturbed operational areas while active areas are maintained daily.

4.2 Proposed SWPPP

Based on the proposed operations described within this Plan, the SWPPP will be amended as necessary to identify an effective combination of erosion and sediment control for all disturbed areas during the rainy season, as required by permit. Note that active (or disturbed) areas are operational year-round. The amount of active operations can be significantly less during the winter season.

Erosion and sediment controls will be designed and implemented using guidance in the latest editions of the California Storm Water Quality Association's (CASQA) Industrial and Construction Best Management Practice (BMP) Handbooks or the Regional Water Quality Control Board's Erosion and Sediment Control Field Manual. Disturbed areas include roadways, slopes, and stockpiles.

Erosion and sediment controls will be inspected on a weekly basis, before expected rain events and immediately after rain events. They will be maintained per CASQA guidelines and vendor instructions. Repairs will be made immediately or as soon as weather permits. A log of inspections and repairs will be kept in addition to a schedule for annual maintenance for items between April and October.

5 Operations Reporting

5.1 Bi- Monthly Reports

BSP will submit a bi-monthly report the City of Pacifica. The report will contain information from the Operator and summarize the following information:

- a. Field Activities
- b. Storm Water
 - i. BMP's Status and Location Map
- c. Imported Materials
 - i. Estimated Monthly Quantities
 - ii. Load Counts by truck type/size.
- d. Approved list of Projects & Supporting Documentation

Baylands Soil Pacifica, LLC

Submittal Guidelines for Imported Soil

The following guidelines are provided as a prescriptive step process to ensure the contractual and regulatory requirements for Baylands Soil Pacifica are met and the appropriate quality control documentation is provided in a timely manner. Please contact info@thebaylands.com for questions.

Soil Review & Acceptance Guidelines

1. Complete Source Information Form (SIF)

- a. See Exhibit A
- b. Do not leave any area blank.
- c. Submit via email to info@baylandspacificacom

2. Determine Number of Samples for Environmental Analysis by type of project:

- a. Borrow Area (e.g., one common piece of property with the same use; commonly referred to as a Mass Excavation)
- b. Stockpile (e.g., pipelines, multiple locations, multiple uses on one site)

| Environmental Sampling Requirements | |
|-------------------------------------|---|
| Borrow Area (aka Mass Excavation) | |
| 2 acres or less | 4 discreet samples |
| 2 to 4 acres | Minimum 1 sample per ½ acre |
| 4 to 10 acres | Minimum 8 samples |
| Greater than 10 acres | Minimum of 8 locations with 4 subsamples per location |
| Stockpile ⁽¹⁾ | |
| Up to 1,000 cubic yards (CY) | 1 sample per 250 CY |
| 1,000 CY to 5,000 CY | 4 samples for first 1,000CY's plus 1 sample for each additional 500 CY |
| Greater than 5,000 CY | 12 samples for first 5,000CY's plus 1 sample for each additional 500 CY |

1. Composite samples are acceptable provided they don't exceed 4:1 ratio.
 For example: 2-point (2:1) composite may represent up to 500 CY for stockpile material.
 4-point (4:1) composite may represent up to 1,000 CY for stockpile material.

Baylands Soil Pacifica, LLC

Submittal Guidelines for Imported Soil

3. Determine Number of Samples for Geotechnical Analysis:

- a. Plasticity Index:
 - i. Every import source/project seeking approval to import material into BSP Pacifica Site must submit at least one (1) test for Plasticity Index.
 - ii. Plasticity Index Frequency:
 1. For projects that are 1,000 Cubic Yards or more – 1 EA Plasticity Index is required for every 2,500 Cubic Yards of Material to be imported.
- b. Expansion Index:
 - i. Import sources/projects seeking approval to import material into BSP Pacifica Site must submit one (1) test for Expansion Index test for every 5,000 Cubic Yards of Import which exceed the first 5,000 Cubic Yards of import.
 - ii. Expansion Index Frequency:
 1. For projects that are 5,000 Cubic Yards or less – No Expansion Index test is required.
 2. For projects 5,000 cubic yards or more:
 - a. 1 test for every 5,000 Cubic Yards after the first 5,000 Cubic Yards of Import.

4. Testing:

- a. Normally provided by contractor but can be performed by BSP staff at an additional cost. Contact BSP for pricing.
- b. **ONLY** BSP Staff are allowed to conduct sampling and testing for materials located on BSP facilities. This includes materials imported beyond the estimated volume as shown on the Source Information Form.
- c. Prior Environmental and Geotechnical Reports may be used for preliminary screening; however, BSP requires laboratory testing performed within the past 6 months for purposes of review and approval.
- d. Compositing soil samples shall be analyzed for the following constituents:
 - VOCs, including MTBE and TPH – GRO (EPA Method 8260B);
 - SVOCs (EPA Method 8270C); **8270C SIM may be used to augment 8270C**
 - Organochlorine Pesticides (EPA Method 8081);
 - PCBs (EPA Method 8082);
 - TPH – D and MO (EPA Method 8015);
 - Chromium +6 (EPA Method 7199); and
 - 17 CAM metals (EPA Method 6000/7000 series):
 - antimony (EPA Method 6010B);
 - arsenic (EPA Method 200.8);
 - barium (EPA Method 6010B);
 - beryllium (EPA Method 6010B);
 - cadmium (EPA Method 6010B);
 - chromium (EPA Method 6010B);
 - cobalt (EPA Method 6010B);
 - copper (EPA Method 6010B);
 - lead (EPA Method 6010B);

Baylands Soil Pacifica, LLC

Submittal Guidelines for Imported Soil

- mercury (EPA Method 7470A);
 - Molybdenum (EPA Method 200.8)
 - nickel (EPA Method 6010B);
 - selenium (EPA Method 6010B);
 - silver (EPA Method 6010B);
 - thallium (EPA Method 6010B);
 - vanadium (EPA Method 6010B); and
 - zinc (EPA Method 6010B).
- ph (EPA Method 9045C)
 - Plasticity Index (Atterberg Limits – ASTM D 4318)
 - Expansion Index (ASTM D 4829)
 - Sudden Oak Death Fungi Testing
 - Valley Fever fungus Testing
- e. **Additional requirements**
- i. Maximum Detection Limits (MDL's) shall be included in lab reports for tests 8081, 8082 and 8270. MDL's shall be at or below the Environmental Screening Limits (ESL's) shown in Table 1 and Table 2.
 - ii. If a CAM-17 TTLC test result is ten (10) times **greater** than its Table 2 value, BSP requires an STLC test to be submitted to determine soluble concentration. Results must be less than the STLC ESL's shown in Table 2 to be accepted.
 - iii. pH results that are less than 5 or greater than 10 may result in higher dump fees.
 - iv. Chain of Custody form to state if sample is a composite and the ratio (e.g., 1:2 or 4:1). BSP does not accept composites greater than 4:1.

5. Review Process

- a. Submit SIF and Test Results from an ELAP certified laboratory for BSP review via email to: info@baylandspacifica.com
- b. Material Review Notes:
 - i. Summary tables are useful to facilitate review, but actual lab reports are required to confirm values.
 - ii. If "Background" value in Table 1 is shown, the higher value between Background value and ESL shall be used to determine acceptance.
- c. If the materials are deemed acceptable, BSP will issue a unique project ID number, Purchase Order and Soil Acceptance Letter stating conditions of approval including maximum import volume limit.
- d. BSP will reply via email if the materials are unacceptable, or if corrective action is required to properly determine material acceptance.

ALTERNATIVE: At the sole discretion of BSP, materials may be imported into BSP's Material Containment Area (MCA) prior to approval provided that the Source Generator submits a letter acknowledging: (1) they are the Generator and (2) responsible for all associated cost should the materials received by the Generator are found to be unacceptable. The Letter shall be accompanied with preliminary test information sufficient for BSP to determine if materials can be imported into the MCA. All materials imported into the MCA are subject to confirmation testing by BSP at additional costs to the Generator, or as mutually agreed to by BSP and the Generator.

Baylands Soil Pacifica, LLC
Submittal Guidelines for Imported Soil

Table 1
Environmental Screening Levels (ESLs)
For
Imported Materials

Table 1 Notes:

" -- " not applicable or not available; " mg/kg " milligrams per kilogram

If background value is available, the higher value between background and ESL shall be used.

* ESL not available; USEPA Risk-Based Soil Screening Levels (SSLs) for the protection of groundwater were used (4).

References:

(1) Background Metals Concentrations in Soil in Northern Santa Clara County (Scott, 1995)

(2) Analysis of Background Distributions of Metals in the Soil at Lawrence Berkeley National Laboratory (LBNL June 2002, Revised April 2009)

(3) All proposed concentrations are from California Regional Water Quality Control Board, San Francisco Bay Region (CRWQCB). Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater, Interim Final. rev June 2016. Minimum ESL between GW protection and Direct contact for soils < 3 meters below ground surface unless highlighted in red.

(4) USEPA, 2011. Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites.

(5) 95% Upper Confidence Limit of the Mean Concentration for Benzo(a)pyrene equivalents from Use of the Northern and Southern California Polynuclear Aromatic Hydrocarbon (PAH) Studies in the Manufactured Gas Plant Site Cleanup Process Draft for Public Comment – Cal-EPA May 8, 2009

(6) SF RWQCB Letter dated 9/14/17 regarding Concurrence with Proposed Revisions to the Baylands Soil Processing Acceptance Criteria, Brisbane Landfill, San Mateo County

(7) SF RWQCB correspondence dated 10/23/17 regarding Concurrence with Proposed Revisions to the Baylands Soil Processing Acceptance Criteria, Brisbane Landfill, San Mateo County

Baylands Soil Pacifica, LLC
Submittal Guidelines for Imported Soil

Table 1

| Chemical | Background (mg/kg) ⁽¹⁾ | BSP ESL (mg/kg) ⁽³⁾ |
|---------------------------|--|---|
| Inorganics | | |
| Antimony | 22 | 31 |
| Arsenic ⁽¹⁾ | 11 | 11 |
| Barium ⁽²⁾ | 410 | 3000 |
| Beryllium | 3.2 | 42 |
| Cadmium | 14 | 39 |
| Chromium | 170 | 120,000 |
| Chromium VI | - | 0.3 |
| Cobalt ⁽²⁾ | 25 | 25 |
| Copper | 67 | 3,100 |
| Lead ⁽²⁾ | 54 | 80 |
| Mercury | 1.3 | 13 |
| Molybdenum ⁽²⁾ | 4.8 | 390 |
| Nickel | 145 | 150 |
| Selenium ⁽²⁾ | 4.9 | 390 |
| Silver | 4.8 | 390 |
| Thallium | 3.8 | 3.8 |
| Vanadium ⁽²⁾ | 90 | 390 |
| Zinc | 120 | 23,000 |

Baylands Soil Pacifica, LLC
Submittal Guidelines for Imported Soil

| PAH's | | |
|-------------------------|-------------------------------|---|
| Chemical | Background (mg/kg) | BSP ESL (mg/kg) ⁽³⁾ |
| Acenaphthene | - | 1.6 |
| Acenaphthylene | - | 13 |
| Anthracene | - | 2.8 |
| Benzo[a]anthracene | - | 0.16 |
| Benzo[a]pyrene | 0.4 ⁽⁵⁾ | 0.4 |
| Benzo[b]fluoranthene | - | 0.16 |
| Benzo[g,h,i]perylene | - | 2.5 |
| Benzo[k]fluoranthene | - | 1.6 |
| Chrysene | - | 3.8 |
| Dibenz[a,h]anthracene | - | 0.016 |
| Fluoranthene | - | 60 |
| Fluorene | - | 8.9 |
| Indeno[1,2,3-c,d]pyrene | - | 0.16 |
| Methylnaphthalene, 2 | - | 0.25 |
| Naphthalene | - | 0.03 |
| Phenanthrene | - | 11 |
| Pyrene | - | 85 |

Baylands Soil Pacifica, LLC
Submittal Guidelines for Imported Soil

| Chemical | Background (mg/kg) | BSP ESL (mg/kg) ⁽³⁾ |
|------------------------|-----------------------|-----------------------------------|
| Pesticides/PCBs | | |
| 4,4'-DDD | - | 2.7 |
| 4,4'-DDE | - | 1.9 |
| 4,4'-DDT | - | 1.9 |
| Aldrin | | 0.036 |
| Aroclor 1248 | - | 0.23 |
| Aroclor 1254 | - | 0.24 |
| Aroclor 1260 | - | 0.24 |
| Chlordane | - | 0.48 |
| Dieldrin | 0.002 ⁽⁶⁾ | 0.002 |
| Endosulfan I | | 0.0046 |
| Endosulfan II | | 0.0046 |
| Endosulfan sulfate | | 0.0046 |
| Endrin | 0.002 ⁽⁶⁾ | 0.002 |
| Endrin aldehyde | 0.002 ⁽⁶⁾ | 0.002 |
| Endrin ketone | 0.002 ⁽⁶⁾ | 0.002 |
| Heptachlor | 0.002 ⁽⁶⁾ | 0.002 |
| Heptachlor epoxide | 0.002 ⁽⁶⁾ | 0.002 |
| Lindane | - | 0.0098 |
| Methoxychlor | - | 19 |
| | | |

Baylands Soil Pacifica, LLC
Submittal Guidelines for Imported Soil

| SVOCs | | |
|-----------------------------|-------------------------------|---|
| Chemical | Background (mg/kg) | BSP ESL (mg/kg) ⁽³⁾ |
| 2,4,6-Trichlorophenol | - | 0.21 |
| 2,4-Dichlorophenol | - | 0.3 |
| 2,4-Dinitrotoluene | 0.13 ⁽⁷⁾ | 0.0018 |
| Benzoic Acid | | 34* |
| Bis(2-Ethylhexyl) Phthalate | - | 39 |
| Butyl-benzyl-phthalate | | 0.51* |
| Diethyl phthalate | - | 0.035 |
| Dimethyl Phthalate | - | 0.035 |
| Hexachlorobutadiene | | 0.68 |
| Hexachloroethane | - | 1.1 |
| Phenol | - | 0.076 |

| TPH | |
|-----------------------------|---|
| Chemical | BSP ESL (mg/kg) ⁽³⁾ |
| TPH Gasoline (GRO) C6 - C10 | 100 |
| TPH Diesel (DRO) C11- C28 | 230 |
| TPH Motor oil C23 – C36 | 5,100 |

Baylands Soil Pacifica, LLC
Submittal Guidelines for Imported Soil

| Chemical | Background (mg/kg) | BSP ESL (mg/kg) ⁽³⁾ |
|-------------------------------|-----------------------|-----------------------------------|
| VOCs | | |
| 1,1,1,2-Tetrachloroethane | - | 0.01 |
| 1,1,1-Trichloroethane | - | 7.8 |
| 1,1,2,2-Tetrachloroethane | - | 0.018 |
| 1,1,2-Trichloroethane | - | 0.07 |
| 1,1-Dichloroethane | - | 0.2 |
| 1,1-Dichloroethylene | - | 0.55 |
| 1,2,4-Trichlorobenzene | - | 1.5 |
| 1,2,4-Trimethylbenzene | | 0.081 |
| 1,2-Dibromo-3-chloropropane | - | 0.0045 |
| 1,2-Dibromoethane | 0.004 ⁽⁶⁾ | 0.00033 |
| 1,2-Dichlorobenzene | - | 1.6 |
| 1,2-Dichloroethane | - | 0.0045 |
| 1,2-Dichloropropane | - | 0.12 |
| 1,3,5-Trimethylbenzene | | 0.087* |
| 1,3-Dichloropropene | - | 0.059 |
| 1,4-Dichlorobenzene | - | 0.59 |
| 2,2-Dichloropropane | | 0.25* |
| 2-Chlorotoluene | | 0.23 |
| 4-Isopropyltoluene (p-cymene) | | 1.1* |
| 4-Methyl-2-pentanone (MIBK) | - | 2.8 |
| Acetone | - | 0.5 |

Baylands Soil Pacifica, LLC
Submittal Guidelines for Imported Soil

| | | |
|---------------------------------|---|-------|
| Benzene | - | 0.044 |
| Bromodichloromethane | - | 0.52 |
| Bromoform | - | 1.7 |
| Bromomethane | - | 0.3 |
| Butylbenzene, n- | | 5.9* |
| Carbon disulfide | | 0.24 |
| Carbon tetrachloride | - | 0.048 |
| Chlorobenzene | - | 1.5 |
| Chloroethane | - | 1.1 |
| Chloroform | - | 0.68 |
| Chloromethane (methyl chloride) | - | 2.9 |
| Dibromochloromethane | - | 3.8 |
| Dichloroethylene, cis-1,2 | - | 0.19 |

| Chemical | Background (mg/kg) | BSP ESL (mg/kg) ⁽³⁾ |
|----------------------------------|-----------------------|-----------------------------------|
| VOCs | | |
| Dichloroethylene, trans-1,2 | - | 1 |
| Ethylbenzene | - | 1.4 |
| Methyl ethyl ketone (2-butanone) | - | 5.1 |
| Methyl tert-butyl ether (MTBE) | - | 0.023 |
| Methylene chloride | - | 0.077 |
| Naphthalene | - | 0.033 |
| Propylbenzene, n- | | 1.2 |

Baylands Soil Pacifica, LLC
Submittal Guidelines for Imported Soil

| | | |
|------------------------|---|-------|
| Styrene | - | 1.5 |
| Tetrachloroethylene | - | 0.42 |
| Toluene | - | 2.9 |
| Trichloroethylene | - | 0.46 |
| Trichlorofluoromethane | | 0.838 |
| Vinyl chloride | - | 0.008 |
| Xylene (total) | - | 2.3 |

Table 2
STLC Limits for Imported Materials

| Chemical | STLC (mg/L) |
|------------|----------------|
| Antimony | 15 |
| Arsenic | 5 |
| Barium | 100 |
| Beryllium | 0.8 |
| Cadmium | 1.0 |
| Chromium | 5 |
| Cobalt | 80 |
| Copper | 25 |
| Lead | 5 |
| Mercury | 0.2 |
| Molybdenum | 350 |

Baylands Soil Pacifica, LLC
Submittal Guidelines for Imported Soil

| | |
|----------|-----|
| Nickel | 20 |
| Selenium | 1 |
| Silver | 5 |
| Thallium | 7 |
| Vanadium | 24 |
| Zinc | 250 |

EXHIBIT A

SOURCE INFORMATION FORM

INSTRUCTIONS: COMPLETE ALL AREAS OF FORM
WHEN COMPLETED, EMAIL TO: Info@thebaylands.com

| GENERATOR (Property/Soil Owner) | | MAIN CONTACT (Soil/Project Representative) | |
|---|-----------------------|--|-----------------------|
| Company: | | Company: | |
| Address: | | Address: | |
| Name: | | Name: | |
| Title: | | Title: | |
| Phone #: | Mobile #: | Phone #: | Mobile #: |
| | | Email: | |
| Transporter Name (if different than Generator or Owner / Representative): | | | |
| Address: | | Phone #: | Mobile #: |
| SITE INFORMATION | | | |
| Project / Site Address: _____ | | | |
| Excavation Type: Classification: <input type="checkbox"/> Stockpile <input type="checkbox"/> Borrow Area/Mass Excavation Acreage: _____ | | | |
| General Property Classification: <input type="checkbox"/> Residential <input type="checkbox"/> Commercial <input type="checkbox"/> Industrial <input type="checkbox"/> Open Space (undeveloped) | | | |
| Current Land Use / Site Operations: _____ | | | |
| Historical Site Information (prior use): _____ | | | |
| TESTING INFORMATION (include sample map for locations; if composite, state ratio per Chain of Custody form) | | | |
| Sample ID# _____ | Type of Sample: _____ | Sample ID# _____ | Type of Sample: _____ |
| Sample ID# _____ | Type of Sample: _____ | Sample ID# _____ | Type of Sample: _____ |
| Sample ID# _____ | Type of Sample: _____ | Sample ID# _____ | Type of Sample: _____ |
| Sample ID# _____ | Type of Sample: _____ | Sample ID# _____ | Type of Sample: _____ |
| Sample ID# _____ | Type of Sample: _____ | Sample ID# _____ | Type of Sample: _____ |
| Lab results shall be from ELAP accredited laboratory and accompanied with Chain of Custody letter | | | |
| SOIL & HAUL INFORMATION | | | |
| Physical Description, e.g. wet, dry, sand, clay, debris contaminated, terrain, etc.: _____ | | | |
| Total Amount of Soil to be Removed (estimated cubic yards): _____ | | Estimated # of truckloads: _____ | |
| Project Time Frame (for soil removal from site): _____ Days _____ Weeks _____ Months | | | |
| Project Start/End dates (approx dates for soil removal): Start _____ End _____ | | | |

EXHIBIT A

Soil Source Information Form

CERTIFICATION

As an authorized representative and transporter for the generator, I certify individually and as an authorized representative of the Generator that I understand that Baylands Soil Pacifica (BSP) shall only receive materials that comply with its soil management plan, submittal guidelines and terms and conditions of acceptance and purchase order, if provided.

I certify, under penalty of law, that the soil I am disposing of (1) does not contain and is not contaminated with any hazardous materials/substances, as defined under any provision of federal, California or local law, (2) meets established acceptance criteria for this site per its Soil Management Plan, (3) was taken from the address and site location(s), as indicated above and has not been combined with any substance from any other site or location, (4) was tested by a State- accredited environmental testing laboratory and that such sampling was not conducted at an unauthorized location and (5) that all information submitted in this Soil Certification form is true and correct. Furthermore, I am fully aware that there are significant penalties for submitting false information, including the possibility of fines and/or imprisonment under federal, state and local law.

I certify that I understand that BSP and the landowner are relying on the information stated in this Form and other submitted documentation to make a determination of acceptance or rejection of Clean Soil, that the I and the Generator of the soil, severally and jointly, agree to indemnify, defend and hold harmless BSP and landowner with respect to the presence of contaminants in the materials in excess of unrestricted Environmental Screening Levels and/or any misrepresentation in the Certification and/or related documents.

I and the Generator accept complete liability for any and all costs associated with the materials should it be found to contain contaminants or be rejected by BSP staff. I understand that BSP reserves all rights to reject any materials at its sole discretion.

(Individually and as authorized representative for Generator)

(Print Name)

(Date)



BAYLANDS PACIFICA
RECLAIM | RESTORE

October 20, 2023

CHRISTIAN MURDOCK, AICP
PLANNING DIRECTOR
CITY OF PACIFICA | PLANNING DEPARTMENT
540 Crespi Drive, Pacifica, CA 94044
Phone: (650) 738-7341 | cmurdock@pacifica.gov

RE: Adaptive Management Plan

Mr. Murdock,

In this letter, Baylands Soil Pacifica has included an Adaptive Management Plan (“AMP”) which we propose to incorporate into the project. The AMP provides a structure for the City and Baylands Pacifica to meet, discuss, and address challenges and opportunities throughout the duration of the Reclamation project.

Adaptive Management Plan for Quarry Reclamation Project (10/12/2023)

Purpose

The purpose of this Adaptive Management Plan is to establish a framework for regular communication and collaborative decision-making between Baylands Soil Pacifica and the City of Pacifica. The meetings aim to review and address various aspects of the quarry reclamation project, ensuring that it aligns with agreed-upon standards, timelines, and community interests.

Frequency and Location of Meetings

Meetings will be held monthly during the course of the project. Given current circumstances and the need for flexibility, these meetings can be conducted on-site or over Zoom, as deemed appropriate.

Agenda Items

1. Traffic Management

- Review of current traffic patterns, volume, and any related complaints
- Discussion of upcoming project phases and potential impact on local traffic
- Recommendations for mitigations or adjustments

2. Multi-Purpose Trail Condition

- Status update on the condition of the multi-purpose
- Any maintenance or safety concerns



BAYLANDS PACIFICA
RECLAIM | RESTORE

3. Import Soil Documentation

- Review of imported soil volumes
- Verification of environmental and geotechnical documentation
- Compliance checks and corrective actions, if needed

4. On-Site Issues

- Review of Dust Monitoring and Control Documentation
- Review of any reported on-site problems
- Discussion on resolution strategies
- Timeline for implementation of resolutions

Meeting Minutes

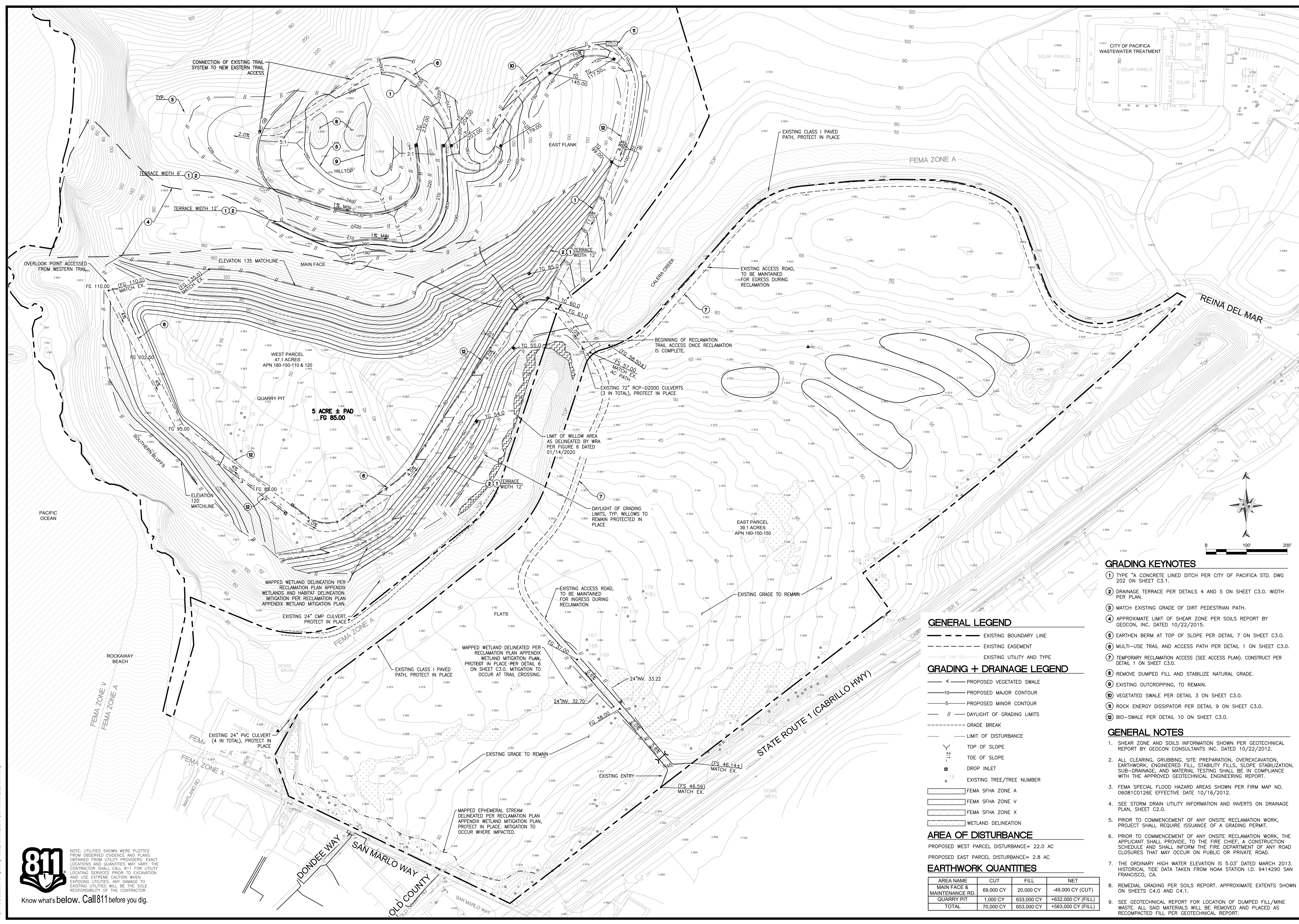
To ensure that all discussions, decisions, and actions are adequately documented, minutes of each meeting will be taken and shared with all attendees within a week following the meeting.

Attendance

Representatives from both Baylands Soil Pacifica and the City of Pacifica should attend the meeting. Additional stakeholders may be invited as necessary.

Sincerely,

Billy Gilmartin



| NO. | DATE | REVISIONS |
|-----|------|-----------|
| | | |
| | | |
| | | |

WE WALSH
ENGINEERING
WALSHENGINEERING.NET (805) 319-4948
1108 GARDEN STREET, SUITE 202-204 SAN LUIS OBISPO, CA 95401

**ROCKAWAY QUARRY
RECLAMATION PLAN
PACIFICA CA**

**PRELIMINARY
CONCEPT
PLAN
ILLUSTRATING
REDUCED FILL
OF THE
DEVELOPMENT
AREA SHOWN
ON THE
GENERAL PLAN
FIGURE 4-7**

DATE: 6/28/2024
SHEET
EXH D

GRADING KEYNOTES

- ① TYPE "A" CONCRETE LINED DITCH PER CITY OF PACIFICA STD. DWG 202 ON SHEET C3.1.
- ② DRAINAGE TERRACE PER DETAILS 4 AND 5 ON SHEET C3.0. WIDTH PER PLAN.
- ③ MATCH EXISTING GRADE OF DIRT PEDESTRIAN PATH.
- ④ APPROXIMATE LIMIT OF SHEAR ZONE PER SOILS REPORT BY GEOCON, INC. DATED 10/22/2015.
- ⑤ EARTHEN BERM AT TOP OF SLOPE PER DETAIL 7 ON SHEET C3.0.
- ⑥ MULTI-USE TRAIL AND ACCESS PATH PER DETAIL 1 ON SHEET C3.0.
- ⑦ TEMPORARY RECLAMATION ACCESS (SEE ACCESS PLAN). CONSTRUCT PER DETAIL 1 ON SHEET C3.0.
- ⑧ REMOVE DUMPED FILL AND STABILIZE NATURAL GRADE.
- ⑨ EXISTING OUTCROPPING, TO REMAIN.
- ⑩ VEGETATED SWALE PER DETAIL 3 ON SHEET C3.0.
- ⑪ ROCK ENERGY DISSIPATOR PER DETAIL 9 ON SHEET C3.0.
- ⑫ BIO-SWALE PER DETAIL 10 ON SHEET C3.0.

GENERAL NOTES

1. SHEAR ZONE AND SOILS INFORMATION SHOWN PER GEOTECHNICAL REPORT BY GEOCON CONSULTANTS INC. DATED 10/22/2012.
2. 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.
3. FEMA SPECIAL FLOOD HAZARD AREAS SHOWN PER FIRM MAP NO. 06081C0126E EFFECTIVE DATE 10/16/2012.
4. SEE STORM DRAIN UTILITY INFORMATION AND INVERTS ON DRAINAGE PLAN, SHEET C2.0.
5. PRIOR TO COMMENCEMENT OF ANY ONSITE RECLAMATION WORK, PROJECT SHALL REQUIRE ISSUANCE OF A GRADING PERMIT.
6. 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.
7. THE ORDINARY HIGH WATER ELEVATION IS 5.03' DATED MARCH 2013. HISTORICAL TIDE DATA TAKEN FROM NOAA STATION I.D. 9414290 SAN FRANCISCO, CA.
8. REMEDIAL GRADING PER SOILS REPORT. APPROXIMATE EXTENTS SHOWN ON SHEETS C4.0 AND C4.1.
9. 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
- 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

PROPOSED WEST PARCEL DISTURBANCE= 22.0 AC
PROPOSED EAST PARCEL DISTURBANCE= 2.8 AC

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) |

sheet: 5/9/2024, release: 6/28/2024, path: c:\projects\enr\20160808_rockaway-quarry_pacifica\drawings\reclamation_plan_20190610\concept_system\reduced_fill_grading_600x900.dwg, author: 20160808_rockaway-quarry_pacifica\drawings\reclamation_plan_20190610\concept_system\reduced_fill_grading_600x900.dwg, date: 2024/06/28

811
Know what's below. Call 811 before you dig.

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.