## **AECOM**

To:

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Project name:

MSS Processing Project (Geotechnical Drilling Only)

Project ref:

From:

Elizabeth Nielsen, AECOM Dillon Lennebacker, AECOM

Date:

Feburary 7, 20231

# **Memorandum**

Subject: CEQA Categorical Exemption for Exploratory Drilling

## **Overview**

Cargill, Incorporated (Cargill) intends to conduct exploratory drilling in support of its Mixed Sea Salt Processing Project (MSS Processing Project) to obtain geotechnical data critical for project design. East Bay Dischargers Authority (EBDA) and Cargill requested that AECOM review five proposed drilling locations and provide documentation to determine whether the work (i.e., the geotechnical investigation) would result in environmental impacts and to support California Environmental Quality Act (CEQA) determinations for the work, if CEQA applies to the work, as a "project" separate from the MSS Processing Project.<sup>2</sup> These locations are associated with two boreholes near the Newark Slough tributary informally referred to as the "Barge Canal" (BH 2 and 3 at locations SB-22-2 and -3) and three boreholes near State Route 84 (BH 9, 10, and 11 at locations SB-22-9, -10, and -11). Cargill provided conceptual project drawings with borehole location points overlaid, assessor parcel number (APN) maps, and a kmz file for each location. Three of the five locations were updated in October 2022 to provide additional setbacks from adjacent wetlands and waters (Attachment A). The locations of BH 2 and 3 were then adjusted in February 2023 to provide an offset from a proposed microtunneling alignment (Attachment B). The updated borehole information was used to create Figure 1 in this memo.

Two of the proposed borehole locations (BH 2 and 3), although located on Cargill property, would require vehicular access over property owned by the San Mateo County Transit District (SamTrans).

<sup>&</sup>lt;sup>1</sup> This Memorandum was originally prepared and provided to EBDA and Cargill on November 15, 2022 (Original Memorandum). The Original Memorandum has been updated by the Memorandum dated January 25, 2023 and again by the Memorandum dated February 7, 2023.

<sup>2</sup> As noted, the exploratory drilling is being proposed to advance the design for the MSS Processing Project, but would not result in the approval of the MSS Processing Project or otherwise make such approval a foregone conclusion. Therefore, if CEQA applies to the exploratory drilling, the work would be considered a separate "project" from the MSS Processing Project under CEQA.

SamTrans requested that Cargill provide further information regarding whether these two borings would result in any environmental impacts, including impacts to biological resources and wetlands and waters of the State and/or U.S., in considering whether to grant Cargill such vehicular access.

EBDA and Cargill therefore requested AECOM to review the potential environmental impacts of the proposed geotechnical investigation, including at borehole locations BH 2 and 3, anticipating that CEQA might apply. The Original Memorandum, dated November 15, 2022, provided this analysis.<sup>3</sup>

Because all five borings would be temporary in nature and for basic data collection only, the only permit required for the borings (other than access approvals from the relevant property owners) is a drilling permit from the Alameda County Water District (ACWD) pursuant to ACWD Ordinance No. 2010-01 (ACWD Well Ordinance). Because ACWD is generally required under the ACWD Well Ordinance to grant a drilling permit if the requirements of the ACWD Well Ordinance are met, Cargill advised AECOM, after preparation of the Original Memorandum, that it considers approvals under the ACWD Well Ordinance to be ministerial, and that CEQA documentation is therefore not required for this activity.<sup>4</sup>

SamTrams, however, has determined that its approval of an access license is a discretionary project under CEQA that requires an analysis of the potential environmental impacts of the proposed exploratory drilling under CEQA. This updated Memorandum has accordingly been prepared at SamTrans' request and with their input to support their decision regarding whether to grant Cargill vehicular access over SamTrans property for the exploratory drilling project. This Memorandum accordingly reviews whether the proposed boreholes at all five locations would result in environmental impacts. This Memorandum provides such environmental diligence review for the borehole drilling activities described herein only and not for the MSS Processing Project, which is being considered in a separate CEQA process.

### Location

The drilling would occur at the five locations referred to above, which are located between Cargill's solar salt production facility and just north of State Route 84 in the city of Newark, Alameda County, California. Table 1 summarizes the borehole drilling location information and Figure 1 illustrates the geospatial locations for each borehole. Attachment A shows the borehole locations on the MSS Processing Project design drawings. Note that the project and work areas called out in the attached drawings are related to MSS Processing Project construction and not related to exploratory borehole drilling.

<sup>&</sup>lt;sup>3</sup> The Original Memorandum was provided to SamTrans, and SamTrans provided Cargill and AECOM with comments and informational requests in connection with the exploratory drilling work at borings BH 2 and 3, for which access over SamTrans property would be needed. This Memorandum provides an update to the Original Memorandum in response, in part, to such comments provided by SamTrans.

<sup>&</sup>lt;sup>4</sup> In addition, ACWD issued a drilling permit for all five borehole locations, including BH 2 and 3, without requiring CEQA documentation.

Table 1. Borehole drilling location and measurements

Map Figure ID	Plan Sheet Location No.	Longitude	Latitude	APN/Owner	City
BH 2 <sup>A</sup>	SB-22-2	6109065.77	2015539.46	537-0852-018-00 Cargill	Newark
BH 3 <sup>B</sup>	SB-22-3	6109098.8	2015715.77	537-0852-018-00 Cargill	Newark
BH 9 <sup>c</sup>	SB-22-9	6107336.077	2022390.661	Caltrans Right of Way	Newark
BH 10 <sup>D</sup>	SB-22-10	6107053.096	2022723.655	Caltrans Right of Way	Newark
BH 11	SB-22-11	6106858.735	2022939.468	Caltrans Right of Way	Newark

#### Notes:

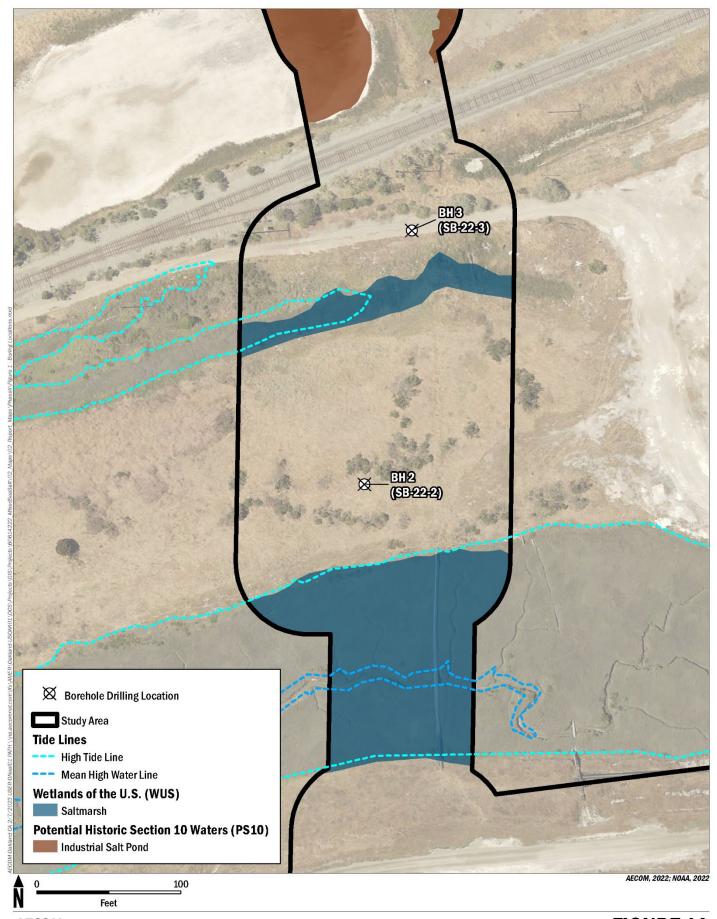
Caltrans = California Department of Transportation

<sup>&</sup>lt;sup>A</sup> BH 2 was relocated 14.5 feet north of the original proposed location and then relocated approximately 24 feet west of that location (see Attachment A).

<sup>&</sup>lt;sup>B</sup> BH 3 was relocated approximately 12 feet east of the original proposed location (see Attachment A).

<sup>&</sup>lt;sup>C</sup> BH 9 was relocated 29.51 feet north of the original proposed location (see Attachment A).

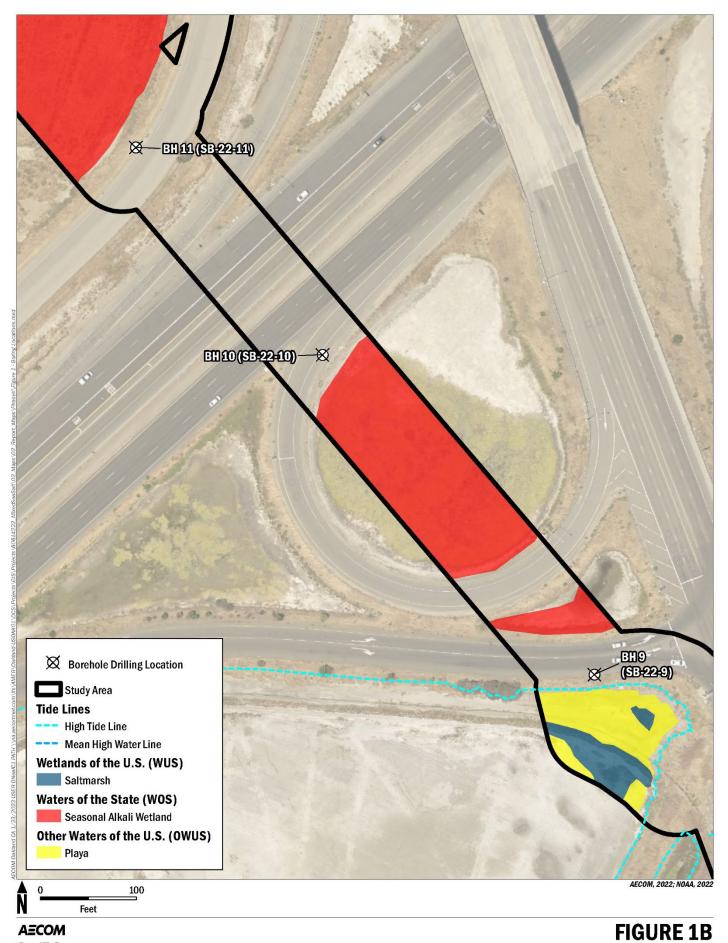
<sup>&</sup>lt;sup>D</sup> BH 10 was located 12.33 feet north of the original proposed location (see Attachment A).



**AECOM** 

**Cargill, Inc.**Cargill Mixed Sea Salts Processing and Brine Discharge Project

**FIGURE 1A** *Exploratory Borehole Drilling Locations* 



**A=COM**Cargill, Inc.
Cargill Mixed Sea Salts Processing and Brine Discharge Project

Exploratory Borehole Drilling Locations

# **Proposed Work**

Cargill would drill exploratory boreholes for geotechnical analysis at the five locations detailed in Table 1. Each borehole would be approximately 8 inches in diameter and would be drilled to depths of 35 to 50 feet. Boreholes would be drilled using a truck mounted drilling rig. Spoils would be temporarily stored on-site and removed at the end of each work day. Once the geotechnical exploration is complete, the boreholes would be destroyed and backfilled in accordance with all requirements found in Section 3.10 of the Alameda County Water District's <u>Standards for the Construction, Use, Operation, Maintenance, Repair, Inactivation, or Destruction of Wells, Exploratory Holes, Other Excavations, and Appurtenances</u> (ACWD 2011). Work at each location is anticipated to be completed within a single work day.

Avoidance and minimization measures will be used at and near wetlands and other sensitive areas when moving the drilling rig from one location to another. Existing roadways will provide vehicular access to the borehole locations. In the case of BH 2, which lies on Cargill fee owned property, a portable drill rig will be walked in by hand to the borehole location from the roadway (no vehicle access will be permitted offroad).

During borehole drilling work at these five locations, the drilling contractor would implement the following best management practices (BMPs), biological avoidance measures to avoid effects on special status wildlife that may be present in adjacent habitats, and cultural resources avoidance measures for as-yet unidentified resources in sensitive areas.

#### **BMPs**

Standard BMPs include, but are not limited to, the following:

- Employ erosion and sediment BMPs and/or setbacks between work areas and adjacent waterways where practical.<sup>5</sup>
- Inspect all construction equipment for leaks prior to bringing it on site. All equipment shall be well maintained and inspected daily while in use to prevent leaks of fuels, lubricants, or other fluids. Appropriate materials shall be available on site to prevent and manage spills.
- All construction personnel will visually check for wildlife beneath vehicles and construction
  equipment before moving or operating them. If an animal is discovered and does not leave the
  site on its own, personnel will contact the project biologist for direction before using equipment.
- Disturbed areas will be stabilized and restored to approximate preconstruction conditions when work is complete.
- All materials or waters generated during drilling, exploratory boring construction, or other activities associated with exploratory borings, will be safely handled, properly managed, and disposed of according to all applicable federal, state, and local statutes regulating such. Liquid waste from drilling residue such as water laden drilling mud shall be contained and not allowed to flow into drainages, channels, and receiving waters. In no case will these materials and/or waters be allowed to enter, or potentially enter, on- or off-site waterways or storm sewers.

<sup>&</sup>lt;sup>5</sup> Temporary erosion and sediment control BMPs will include, depending upon site conditions, geotextile blankets or mats, fiber rolls or gravel bags, or silt fencing.

All remnant excavated material will be hauled offsite to be disposed at a licensed upland disposal
or recycling facility. Any excess imported backfill will be removed from the site by the contractor
before the end of each workday.

# **Biological Avoidance Measures**Salt Marsh Harvest Mouse and other Special Status Species

Prior to the start of work, a biologist experienced with salt marsh harvest mouse (*Reithrodontomys raviventris*) will review the work area (including staging and access points) and surrounding 50 feet for the presence of vegetation suitable for salt marsh harvest mouse and other special status species that occur in bay shore environments. A qualified biologist will be present during all geotechnical investigation work activities at the five borehole locations, whether or not suitable vegetation for salt marsh harvest mouse and other special status species is observed adjacent to or within the work area, to monitor for potential salt marsh harvest mouse incursion into the work area. If a mouse is observed entering the work area, all activities will cease until the mouse has left the area of its own volition. The biologist will also ensure the work area limits are properly delineated and ensure that workers and equipment stay out of adjacent wetland and other sensitive areas.

If suitable vegetation for salt marsh harvest mouse is present within the work area, drilling will be relocated to avoid removal of salt marsh vegetation that could support the salt marsh harvest mouse. The qualified biologist will remain on site during work activities. If a mouse is observed in the work area during the project, the mouse will be avoided and work in the vicinity of the mouse will cease until the mouse has left the area of its own volition.

It is noted that BH 3, 9, 10, and 11 are located at or immediately adjacent to the shoulder of existing roads. In addition, the location of BH 2 and 9 have been adjusted to provide additional buffer between the borehole location and tidal areas. Suitable vegetation for salt marsh harvest mouse is not anticipated at the five borehole locations.

# Ridgway's Rail and California Black Rail Nesting Season

Geotechnical work will be conducted outside of the Ridgway's rail (*Rallus* obsoletus) and California black rail (*Laterallus jamaicensis coturniculus*) breeding season of March to July.

# **Cultural Resources Avoidance Measures**

A qualified archaeologist will be on site to monitor ground-disturbing activities at these five borehole locations. If any precontact or historic-era subsurface archaeological features or deposits (e.g., ceramic shard, trash scatters), including locally darkened soil ("midden"), which may conceal cultural deposits, are discovered during the work activities, all ground-disturbing activity within 100 feet of the resources shall be halted, and a qualified archaeologist (one who meets the Secretary of the Interior's Professional Qualification Standards for archaeology) shall assess the significance of the find. If the find is determined to be significant, appropriate procedures to protect the integrity of the resource and ensure that no additional resources are affected shall be developed and implemented. Procedures may include but would not necessarily be limited to preservation in place, archival research, subsurface testing, or contiguous block unit excavation and data recovery. No work at the discovery location shall resume until all necessary investigation and evaluation of the resource has been satisfied.

Consistent with California Health and Safety Section 7050.5 and 7052 and PRC Section 5097, if suspected human remains are discovered, ground-disturbing activities in the area of the remains shall

be halted immediately, and the Alameda County Coroner shall be notified immediately. If the remains are determined by the coroner to be Native American, California's Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. Following the coroner's findings, the NAHC-designated Most Likely Descendent and the landowner shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments, if present, are not disturbed.

## **CEQA** Review

AECOM examined the supporting information for each of the five exploratory drilling locations to determine if these borings can be considered categorically exempt under CEQA. This review was conducted in consideration of the 2022 CEQA Statutes and Guidelines (AEP 2022) and the CEQA (Public Resources Code [PRC] 21000–21189) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Division 6, Chapter 3, Sections 15000–15387). The California Secretary for Natural Resources prepares and adopts lists of classes of projects which have been determined not to have a significant effect on the environment and which are exempt from CEQA. The borings have potential to be Categorically Exempt under CCR Section 15306 as a Class 6 exemption for information collection. This section is quoted in full as:

#### CCR Section 15306. INFORMATION COLLECTION

Class 6 consists of basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource. These may be strictly for information gathering purposes, or as part of a study leading to an action which a public agency has not yet approved, adopted, or funded.

All CEQA exemption classes must meet the requirements found under CEQA Section 15300.2 provided below:

#### CCR Section 15300.2. EXCEPTIONS

- (a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
- (b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.
- (c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- (d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

- (e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.
- (f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

# **Environmentally Sensitive Areas**

#### **Wetlands and Waters**

AECOM has completed a draft preliminary aquatic resources delineation report (ARDR) to determine potential jurisdictional wetlands and waters of the State and/or U.S. for the MSS brine pipeline alignment, including areas at and adjacent to the five borehole locations (see Figure 1). Based upon the draft ARDR, the five borehole drilling locations do not coincide with wetlands and waters of the State and/or U.S. and additionally are setback at least 10 to 20 feet from any potential jurisdictional waters or wetlands of the U.S. and State. Upon discussion with Cargill, three of the five borehole drilling locations were revised to provide additional setbacks from wetlands and waters. The drilling contractor would implement the above mentioned setbacks and BMPs to avoid incidental discharges into adjacent receiving waters and measures to avoid impacts to biological resources.

The borehole drilling is not anticipated to have direct or indirect impacts on wetlands or waters adjacent to the drilling locations. These borehole locations do not trigger the exception requirements of Section 15300.2(a) for sensitive areas (wetlands and waters).

# **Biological Resources**

AECOM conducted preliminary biological resources studies within a large portion of the MSS Processing Project area including all the proposed borehole locations. Additionally, AECOM reviewed the California Natural Diversity Database (CNDDB) to determine if there is potential for special status species to occur within the borehole drilling work areas (CDFW 2022). At borehole locations BH 2 and 3; the CNDDB indicates that there is potential use by California black rail based on nearby observations, however work at these locations would occur outside of salt marsh habitat that this species occupies and no direct impacts on individuals or habitat for this species is anticipated. No other special-status species are identified in the CNDDB mapping that directly overlaps these borehole locations. At borehole locations BH 9, 10, and 11 there are no CNDDB occurrences that overlap these locations. Additionally, locations BH 9, 10, and 11 occur in developed road shoulders next to active live traffic that inhibits any meaningful use of these locations by special status species.

The borehole drilling would not occur directly in habitat suitable for special status species protected by the federal endangered species act (FESA), the California Endangered Species Act (CESA), or within habitat suitable for species that are considered "special status" under CEQA by the California Department of Fish and Game at all five locations. Special status habitat for sensitive marsh species has potential to occur in wetlands and waters adjacent to all work locations. BH 3, 10, and 11 occur in areas that are barren of vegetation and are adjacent to waters and wetlands. BH 2 occurs in undisturbed open space habitat dominated by upland shrub, grass, and forbs. BH 9 occurs adjacent to playa habitat that could provide some dispersal or seasonal foraging habitat to special status species. However, the playa habitat is barren of vegetation and occurs between a road and a fence and surrounding transition habitat is primarily ruderal vegetation cover; this location likely sees little to no

<sup>&</sup>lt;sup>6</sup> The draft preliminary ARDR was updated in December 2022 subsequent to the date of the Original Memorandum.

meaningful use by special status species. With implementation of the work's BMPs and avoidance measures, the borehole drilling activities would not have impacts on biological resources that would trigger the exception requirements of Section 15300.2.

# **Historical and Archeological Resources**

AECOM conducted a records search and literature review and a geoarchaeological sensitivity assessment for the MSS brine pipeline alignment, which includes locations at and near the proposed geotechnical borings. Three of the borings (BH 9, 10 and 11) are located within the Arden Salt Works (Leslie Salt Company Plant One) Salt Fields, an archaeological resource that has not been evaluated for the National Register of Historic Places or the California Register of Historical Resources (CRHR). P-01-000239/CA-ALA-503H, Leslie Salt Company Plant One/Arden Salt Works is the remnant levee and crystallizing ponds previously recorded around Thornton Avenue. The ponds have been out of production since the early 1960s and have been disturbed by water truck traffic and plowing in order to reduce dust emission from the dry ponds during the late-spring and early summer months. Further disturbance in the area of this resource occurred during the 1980s when Thornton Avenue was constructed through the resource; this is a two-lane road with large bicycle lanes in both directions in the south that becomes a four-lane road with a center median as it nears State Route 84 and transitions to Paseo Padre Parkway north of the highway. The construction of the slightly raised Thornton Avenue and its elevated interchange with State Route 84, which was completed in 1987, greatly disturbed P-01-000239 within the MSS brine pipeline alignment. Work activities at the shoulder of existing roads near the intersection of State Route 84 and Paseo Padre Parkway are not expected to impact the significance of this resource as it has already been disturbed in the construction of the State Route 84 and Thornton Avenue thoroughfares.<sup>7</sup>

The geoarchaeological sensitivity review has found that Holocene-age soils have been mapped throughout. Holocene-age soils have an increased potential for containing submerged, buried, and surface archaeological resources. Sensitivity is greatest in areas near freshwater and nearby known archaeological sites. High sensitivity for submerged archaeological sites is mapped for the southern portion of the MSS brine pipeline alignment to State Route 84 (inclusive of the five borehole locations). Sensitivity for buried archaeological sites is mostly moderate, with patches of high sensitivity mapped in the area along Thornton Avenue to Paseo Padre Parkway. Sensitivity for surface archaeological sites is mapped as mostly high, with some areas mapped as moderately sensitive. Work activities in geoarchaeological sensitive areas and in areas of known archaeological sites have an increased potential to encounter archaeological resources. The abovementioned cultural resource avoidance measures would be implemented at the five borehole locations to minimize potential impacts to as-yet unidentified resources in sensitive areas. With implementation of the cultural resource avoidance measures, the borehole drilling activities would not have impacts on cultural resources that would trigger the exception requirements of Section 15300.2.

<sup>&</sup>lt;sup>7</sup> Under CEQA, a substantial adverse change in the significance of a resource means the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. Actions that would materially impair the significance of a historical resource are any actions that would demolish or adversely alter the physical characteristics that convey the property's historical significance and qualify it for inclusion in the CRHR or in a local register of historical resources or historical resource survey.

<sup>&</sup>lt;sup>8</sup> Submerged resources are those that were originally located along the Bay margins, that have since been inundated by rising sea levels and buried below Bay Mud or estuarine deposits. Surface resources are those that have not been obscured by modern or historic-era land use and are still present on the surface.

# **Scenic Highways**

There are no state-designated scenic highways near the borehole locations. The closest state scenic highway is State Route 238 near Sunol (Caltrans 2022). There would be no impacts to scenic resources within a highway officially designated as a state scenic highway.

#### **Hazardous Materials**

AECOM reviewed databases maintained by the California Department of Toxic Substances Control (EnviroStor) and the State Water Resources Control Board (GeoTracker) to determine if any known hazardous material sites are present within the five borehole areas. Based on this review, hazardous materials are not known to be present within the area where borehole drilling is proposed and handling of hazardous materials is not anticipated. If hazardous materials are discovered during site investigations, material will be stored away from waters, riparian areas, and publicly accessible areas to be tested prior to transporting to an appropriate licensed upland facility for disposal and all appropriate and required documentation and reporting of hazardous materials to state and federal regulators will be completed. No impacts associated with hazardous materials are anticipated from the proposed borehole drilling.

## **Permits and Authorizations**

Cargill will be required to obtain a well permit from the Alameda County Water District prior to conducting drilling activities and must meet all conditions provided in that permit.

Cargill will be responsible for obtaining encroachment permits from Caltrans for locations that occur in their right of way.

Cargill will be responsible for obtaining all necessary access permissions through (SamTrans properties, and any other properties that require access through for the proposed drilling.

Cargill will be responsible for the proper disposal of any hazardous materials encountered in connection with the proposed drilling in compliance with applicable laws and regulations.

Because the work does not occur in wetlands or waters of the U.S. or State, is not anticipated to cause serious or major disturbance that would affect species listed as threatened or endangered under FESA or CESA or their habitat, and is exempt from permitting requirements by the San Francisco Bay Conservation and Development Commission (BCDC) under 14 CCR Section 10130, no State or federal permits or authorizations are anticipated to be required for the proposed drilling work.

Because the drilling work has no apparent federal nexus, the work is not subject to review under the National Environmental Policy Act (NEPA).

### Conclusion

Based on the review of the borehole drilling activities at the five proposed locations, and with the understanding that the BMPs and avoidance measures proposed by Cargill and recommended herein would be implemented during drilling, AECOM suggests that these activities would be Categorically Exempt from CEQA as a Class 6 activity (CCR Section 15306) and would meet the requirements that would prevent it from being excluded as a Categorical Exemption it under CCR Section 15300.2.

AECOM suggests that SamTrans complete a Notice of Exemption (NOE) form in connection with its decision regarding whether to grant Cargill vehicular access over SamTrans property for the exploratory drilling project and file it with the State Clearinghouse; and file an Environmental Declaration form with the Alameda County Clerk.

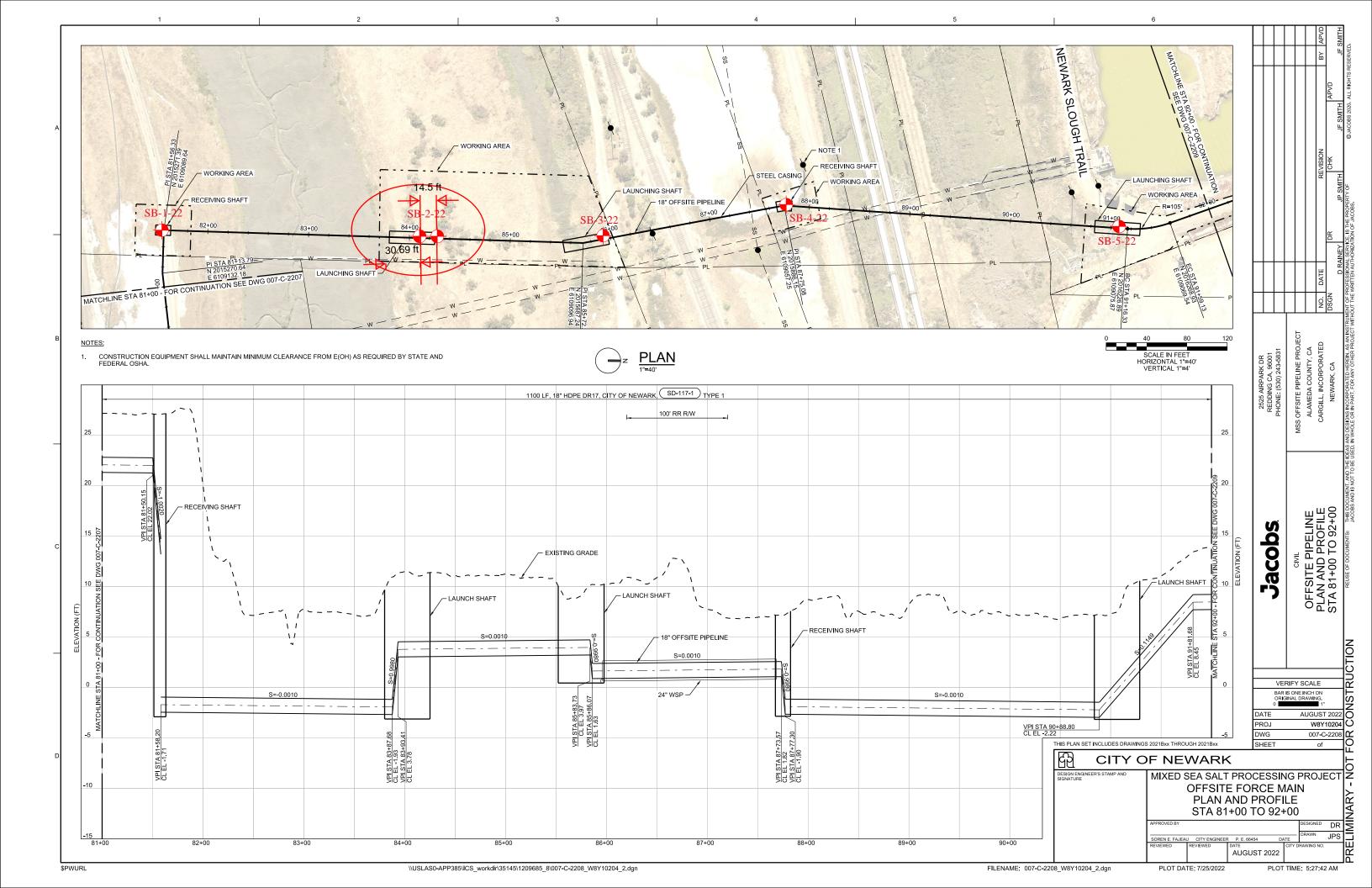
AECOM suggests that Cargill obtain well permits for all locations from the Alameda County Water District concurrent with EBDA's filing of the NOE and Environmental Declaration.

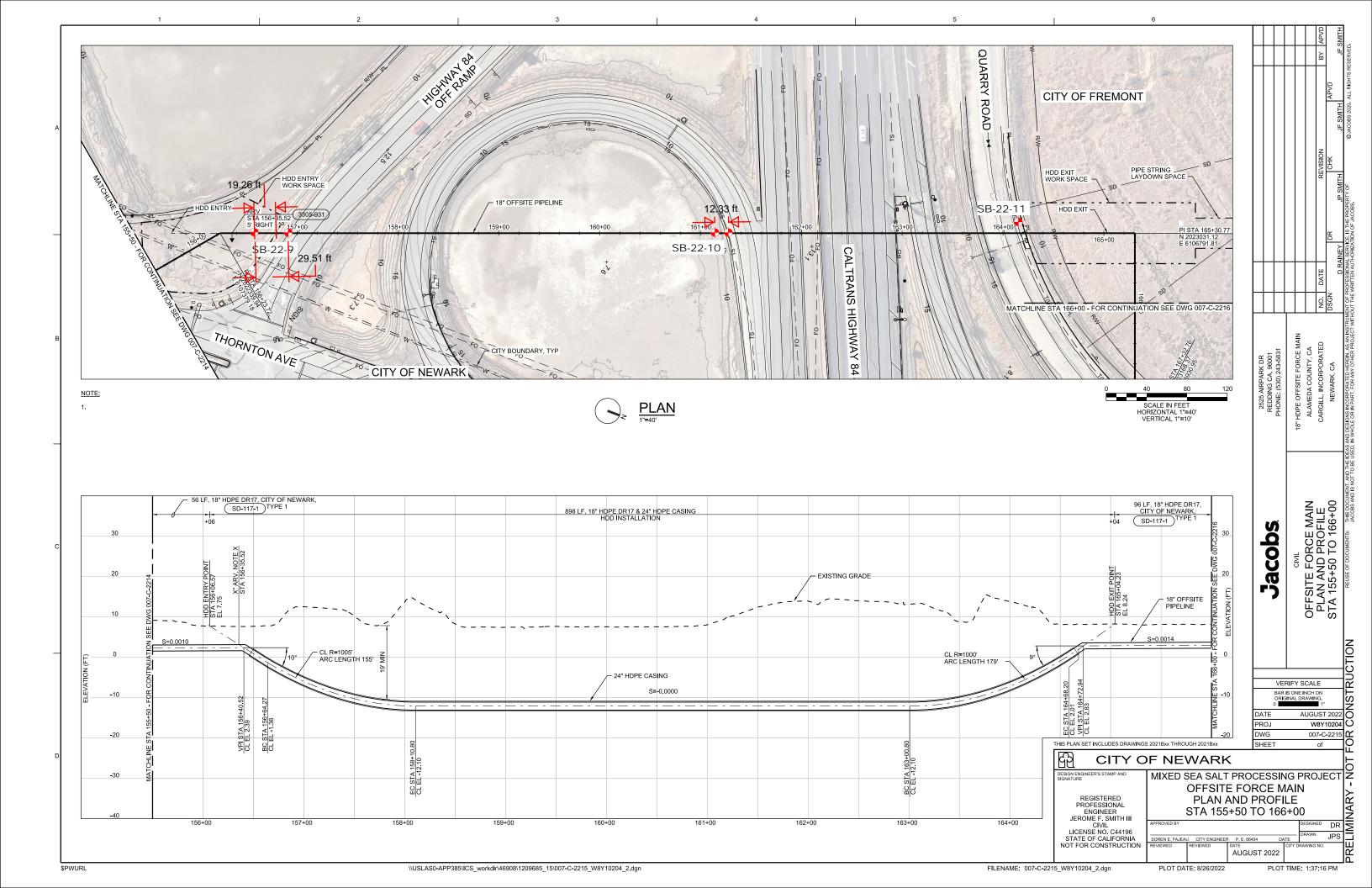
# References

- Alameda County Water District (ACWD). 2011 (April). Standards for the Construction, Use, Operation, Maintenance, Repair, Inactivation, or Destruction of Wells, Exploratory Holes, Other Excavations, and Appurtenances. Available online at: https://www.acwd.org/DocumentCenter/View/167/ACWD-Well-Standards?bidId=. Accessed November 2, 2022.
- Association of Environmental Professionals (AEP). 2022. 2022 California Environmental Quality Act Statute and Guidelines. Available online at: https://www.califaep.org/docs/2022\_CEQA\_Statue\_and\_Guidelines.pdf. Accessed: October 17, 2022.
- California Department of Fish and Wildlife (CDFW). 2022. California Natural Diversity Database (CNDDB). Available online at: https://wildlife.ca.gov/Data/CNDDB. Accessed: October 17, 2022.
- California Department of Transportation (Caltrans). 2022. California State Scenic highways. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-livi-scenic-highways. Accessed October 28, 2022.

# **Attachment A Borehole Location Plan**

Jacobs, 2022





# **Attachment B Updated Borehole Location Plan**

Jacobs, 2023

