

Memorandum

Date: May 14, 2026
To: Board of Directors
From: Joe Issel, Director of Stewardship
Re: Recommendation to Approve Grading Exemption for Peninsula Open Space Trust for San Gregorio Ranch Soil Removal Project

The Grading Ordinance of San Mateo County authorizes the RCD Board of Directors to issue a Grading Permit Exemption on lands in unincorporated San Mateo County for excavation, grading, filling, and clearing in various circumstances, including but not limited to purposes of soil conservation and repairing storm damage.

RCD staff recommends approving a grading exemption for Peninsula Open Space Trust (POST) to remove contaminated soils from San Gregorio Ranch. RCD staff has confirmed that the project is eligible for exemption and that appropriate standards are being adhered to according to the project engineer (EKI Environment and Water). RCD staff visited the project site on May 8, 2026 and confirmed that appropriate soil protection measures are included in project plans. The attached application packet from POST contains more detailed documentation.

11 May 2026

Joe Issel and Jarrad Fisher
San Mateo Resource Conservation District
80 Stone Pine Road, Suite 100
Half Moon Bay, California 94019

Subject: Request for Grading Permit Exemption;
190 La Honda Road (Highway 84), San Gregorio, San Mateo County, California
(EKI C40222.01)

Dear Mr. Issel and Mr. Fisher:

On behalf of Peninsula Open Space Trust (POST), EKI Environment & Water, Inc. (EKI) has prepared this Request for Grading Permit Exemption to address the removal of pesticide-containing soils at the approximate 2.75-acre San Gregorio Ranch property located at 190 La Honda Road in San Mateo County, California (the Site). The Assessor's Parcel Number (APN) for the Site is 081-021-130.

During POST's pre-acquisition due diligence period in 2025, a sampling investigation identified the presence of certain pesticides in shallow soils around the ranch residence and in the vicinity of former Site structures that dated back to before the 1970s. The pesticides detected in soil included chlordane and DDT compounds, which likely were legally applied at the time. The Site is directly adjacent to the banks and mouth of San Gregorio Creek, an estuary that supports sensitive species such as the endangered coho salmon (*Oncorhynchus kisutch*) and tidewater goby (*Eucyclogobius newberryi*), and threatened steelhead trout (*Oncorhynchus mykiss*).

POST will acquire the greater San Gregorio Ranch later in May 2026 and desires to remove certain areas of pesticide-affected soils at the Site and place clean, imported soils back into the excavations in order to improve the health and natural resource value of the Site. The removal of pesticide-affected soils and off-Site disposal at an appropriately-permitted disposal facility will contribute to conservation efforts by helping to protect the quality of on-Site resources, as well as to prevent potential harm to San Gregorio Creek. This soil removal work will take place in the summer to limit erosion and sediment transfer due to precipitation; even so, appropriate erosion control measures will be put in place. The work does not involve any significant vegetation removal.

POST has protected the entire 238-acre ranch property with a conservation easement that holds conservation values over the health of the soil, riparian areas, and live trees for more than 30 years. This conservation easement is being considered for modification under POST's fee ownership to expand the protections around the riparian corridor by restricting additional use or development, before transferring the entire property to California State Parks.

This Exemption Request includes the following documents:

- Completed Application for Certificate of Exemption from Grading Permit (see attached).
- Work Plan describing the project goals and objectives, and implementation methods.
- Project location map (included in the Work Plan); the Site is approximately 1,000 feet east of the intersection of Highway 1 (Cabrillo Highway) and Highway 84 (La Honda Road), on the south side of the road.
- A project design drawing showing areas of planned disturbance, and approximate and cut and fill volumes, is included in the Work Plan, along with total cubic yards of soil to be removed.
- Project implementation schedule and timing is included in the Work Plan.

The estimated volume of soil removal is approximately 1,600 cubic yards, which exceeds San Mateo County's grading permit requirement based on volume, thus, a grading permit exemption is requested; no other permit requirements apply to this project. As the project is entirely for environmental remediation and site conservation benefits, there are no structural changes that would otherwise require San Mateo County review. The remedial action is being conducted by POST purely on a voluntary basis, and the work plan soil remedial goals are the San Francisco Bay Regional Water Quality Control Board (RWQCB) environmental screening levels (ESLs) for residential (unrestricted) use, which meets the most stringent cleanup levels that could be required by the San Mateo County Environmental Health Department. As noted in the Work Plan, post-excavation confirmation soil samples will be collected to document that the proposed soil cleanup levels have been achieved.

The soil removal project plan has been prepared under the direction of John T. DeWitt, P.E., a California registered Civil Engineer, with over 35 years of experience designing soil remediation projects, including several projects for POST. In the preparation of the remedial design documents, Mr. DeWitt reviewed and coordinated the design with the NRCS federal standards for conservation practices and developed the remedial design in accordance with:

- *Conservation Practice Standard, Precision Land Forming and Smoothing (Code 462)*, Natural Resources Conservation Service, United States Department of Agriculture, document 462-CPS-1, dated August 2022.
- *Conservation Practice Standard, Riparian Forest Buffer (Code 391)*, Natural Resources Conservation Service, United States Department of Agriculture, document 391-CPS-1, dated October 2020 and

These standards are applicable as the project involves soil excavation, grading, and dust erosion control which are common activities in land forming and grading projects, and the fact that the Site is adjacent to San Gregorio Creek and the existing naturally occurring buffer between the Site and the creek must be maintained.

Mr. Issel and Mr. Fisher
San Mateo Resource Conservation District
11 May 2026
Page 3 of 3



Please contact us at 650-292-9100 if you have questions regarding this exemption request.

Very truly yours,

EKI ENVIRONMENT & WATER, INC.

A handwritten signature in blue ink that reads 'John T. DeWitt' with a long horizontal flourish extending to the right.

John T. DeWitt, P.E.
Vice President

A handwritten signature in black ink that reads 'Paul B. Hoffey' with a long horizontal flourish extending to the right.

Paul B. Hoffey
Principal

Attachment: Completed Application for Certificate of Exemption

cc: Gabi Ramratan, POST



Grading Permit Exemption

The Grading Ordinance of San Mateo County authorizes the Resource Conservation District (RCD) to issue a Grading Permit Exemption in the following circumstances: projects where the land to be cleared is for natural resource management; agricultural use of land that is operated in accordance with a conservation plan approved by and implemented according to the practices of the RCD or when it is determined by the RCD that such use will not cause excessive erosion or sediment losses; purposes of soil conservation that have been approved by the RCD; agricultural water impoundments not exceeding the minimum limitations of the State Dams and Reservoir Act of 1967 when designed, observed, and approved by the RCD; or repair storm damage consisting of slide repair, debris removal and water impoundment replacement on agricultural lands carried out under the purview of the RCD or NRCS. A Grading Permit Exemption is not allowed to resolve grading violations.

The process for obtaining a Grading Permit Exemption (GRX) is as follows.

1. Consult with the local NRCS- RCD partnership office in Half Moon Bay to determine if the proposed project is eligible for a GRX.
2. Review (or have engineer/consultant review) NRCS federal standards and specifications for conservation practices by calling the NRCS or reviewing the NRCS website at <http://www.nrcs.usda.gov/technical/standards/nhcp.html>.
3. Seek advice from the San Mateo County Planning and Building Division to determine if any additional County permits are needed. Please note that a GRX does not exempt an applicant from any other permit requirements, including County, State or federal permits or authorizations.
4. Submit proposal packet to RCD with the following information:
 - Application form
 - Project description including goals and objectives, activities to be undertaken, equipment to be used, and natural resource conservation benefits.
 - Project location map with project boundaries, and driving directions for accessing project
 - Project design or drawings²
 - Project implementation schedule
5. Schedule an on-site visit with the NRCS and/or RCD to review the project and obtain conservation technical assistance.
6. Revise project proposal as appropriate based on recommendations from NRCS and/or RCD staff and submit any revisions to the RCD.
7. Applicant work with RCD staff to schedule consideration of GRX at a publicly noticed meeting of the RCD Board of Directors.
8. RCD Board of Directors considers application and approves or denies the GRX.
9. Upon approval of the GRX:

- Applicant pays fee to RCD based on size of project (see fee schedule below).
- RCD submits approved GRX to San Mateo County Planning and Building Division staff.
- County provides RCD and applicant with Planning permit identification number.

10. Upon completion of project:

- Applicant, consultant/ engineer, or NRCS submit letter to RCD verifying compliance with approved standards and specifications.
- RCD notifies County of project completion.

Yards of Dirt to be Moved:

	<u>Fee</u>
1 up to 100 cubic yards	\$ 500.00
101 up to 1,000 cubic yards	\$ 750.00
1,001 up to 5,000 cubic yards	\$ 1,000.00
5,001 up to 10,00 cubic yards	\$ 1,250.00
10,001 cubic yards & above	\$ 1,500.00

RCD/NRCS assistance for programs over 10,000 CY will be determined on a case by case basis.



PHONE: 650.712.7765
80 Stone Pine Rd, Ste.100
Half Moon Bay, CA 94019

Application for Certificate of Exemption from Grading Permit

INSTRUCTIONS

Please read the Grading Permit Exemption Application Process document prior to submitting your proposal for a Grading Permit Exemption from the RCD. The RCD will only review applications from applicants who have discussed their project with the San Mateo County Planning and Building Division. Approval of a Grading Permit Exemption does not exclude the applicant from other necessary permits. Please submit your fee with your application. Fee schedule is on the second sheet.

PROJECT INFORMATION

Project Name: San Gregorio Ranch Soil Removal Project
APN/s: 081-021-130
Site Address/Location: 190 La Honda Road (Highway 84)
San Gregorio, San Mateo County
Cubic Yards to be Moved: 1,600 cy

Area to be Cleared: 22,000 sf (0.5 acre)
Conservation Purpose: Remove soil affected by the pesticides DDT and chlordane and backfill with clean soil.

Please check allowable GRX circumstance:

- Land to be cleared is for natural resource management
- Agricultural use of land that is operated in accordance with a conservation plan
- Soil conservation

- Agricultural water impoundments not exceeding the minimum limitations of the State Dams and Reservoir Act of 1967
- Repair storm damage consisting of slide repair or debris removal
- Water impoundment replacement on agricultural lands

AGENCY INFORMATION AND CERTIFICATION

Applicant Name: Daniel Olstein
Agency Name (if applicable): Peninsula Open Space Trust
Phone Number: 650-319-3330
Email: dolstein@openspacetrust.org
Mailing Address: 222 High Street, Palo Alto CA 94301

I hereby certify that the statements furnished in this form and in the attached exhibits present the data and information required for this initial evaluation to the best of my ability, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief. If any of the facts represented here change, it is my responsibility to inform the RCD.

Signed by: Daniel Olstein
Signature: _____

Date: 5/6/2026

Name: Daniel Olstein

Title: Director of Conservation & Stewardship

Did you seek advice from San Mateo County Planning and Building Division? Yes No
N/A - based on conversation with Joe Issel

RCD USE

RCD Board Approval

Signature: _____
Name: _____
Date: _____

Paid in Full: _____ Check Number: _____ Amount: _____
Date Submitted to SMC: _____
County GRX Number: _____

SOIL REMOVAL WORK PLAN

**San Gregorio Ranch
190 La Honda Road
San Mateo County, California
APN 081-021-130**

**Prepared on Behalf of:
Peninsula Open Space Trust**

**Submitted to:
San Mateo Resource Conservation District**

**6 May 2026
EKI C40222.01**

SOIL REMOVAL WORK PLAN

San Gregorio Ranch, 190 La Honda Road, San Mateo County, California

6 May 2026

Prepared for:

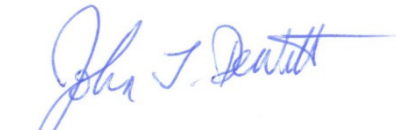
Peninsula Open Space Trust (POST)

Prepared by:

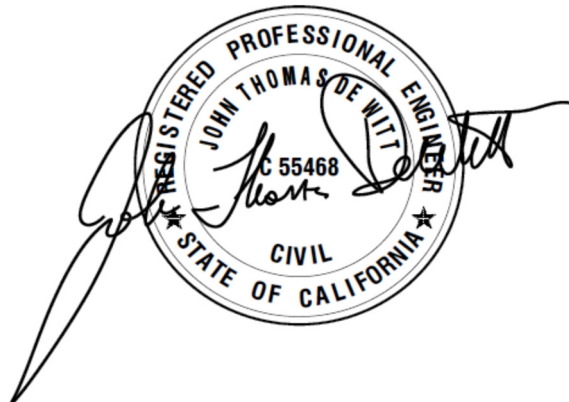
EKI Environment & Water, Inc.
2001 Junipero Serra Blvd., Suite 300
Daly City, California 94014
(650) 292-9100
www.ekiconsult.com
EKI C40154.01



Paul B. HOFFEY
Principal



John T. DeWitt, P.E.
Project Engineer



Soil Removal Work Plan

San Gregorio Ranch, 190 La Honda Road, San Mateo County, California

TABLE OF CONTENTS

1	INTRODUCTION	1-1
1.1	Background and Rationale for Proposed Remediation	1-1
1.2	Work Plan Elements	1-1
2	SITE BACKGROUND	2-1
2.1	Site Location, Setting, Current Uses	2-1
2.2	POSTs Objectives for Site	2-1
2.3	Pesticides Detected in Soil at the Site	2-1
3	NATURE AND EXTENT OF CHLORDANE AND DDT IN SOILS	3-1
4	PROPOSED SOIL REMOVAL ACTION IMPLEMENTATION	4-1
4.1	Proposed Soil Remediation Areas	4-1
4.2	Contractor’s Licensing and Training	4-1
4.3	Site Preparation Activities	4-1
4.4	Soil Excavation and Stockpiling Methodology.....	4-2
4.5	Post-Excavation Confirmation Soil Sampling.....	4-3
4.6	Stockpile Sampling and Laboratory Analyses for Off-Site Disposal Profiling	4-3
4.7	Off-site Disposal	4-3
4.8	Backfill of Excavations and Site Restoration.....	4-3
5	PROJECT TIMING AND REPORT OF COMPLETION.....	5-1
5.1	Timing of Soil Removal Activities.....	5-1
5.2	Removal Action Completion Report.....	5-1
6	REFERENCES	6-1

LIST OF FIGURES

Figure 1	Site Location Map
Figure 2	Soil Sample Locations
Figure 3	Planned Soil Excavation Extents

LIST OF TABLES

Table 1	Multi-Increment and Discrete Soil Sample Analytical Results for Organochlorine Pesticides
---------	---

1 INTRODUCTION

On behalf of Peninsula Open Space Trust (POST), EKI Environment & Water, Inc. (EKI) has prepared this *Soil Removal Work Plan* (Work Plan) for the San Gregorio Ranch property located at 190 La Honda Road in San Mateo County, California (the Site; see Figure 1 for Site location). The Assessor's Parcel Number (APN) for the Site is 081-021-130. The Site is approximately 2.75 acres in size.

Sampling performed by EKI on behalf of POST in 2025 identified the presence of the organochlorine pesticides (OCPs) chlordane and DDT compounds in surface and shallow soil on the Site from past, likely legal, application of pesticides. The concentrations of chlordane and DDT compounds in certain areas of the Site exceed their current regulatory agency screening criteria for residential (unrestricted) land use. POST intends to maintain the residential dwelling on the Site.

1.1 Background and Rationale for Proposed Remediation

Based on soil sampling investigations performed at the Site in 2025 (EKI, 2025), chlordane, and to a lesser extent DDT compounds, are present in surface and shallow soil at the Site (generally in the upper 2.5 feet) a concentrations above their current San Francisco Bay Region California Regional Water Quality Control Board (RWQCB) environmental screening levels (ESLs) for residential (unrestricted) land use. POST intends to retain an appropriately-licensed environmental contractor to excavate soil containing chlordane and DDT compounds to levels below their respective RWQCB ESLs for residential (unrestricted) land use (hereinafter the "removal action goals" or "RAGs"; see Section 4), to be demonstrated through post-excavation confirmation sampling, and dispose of the soil off-Site at an appropriately-permitted disposal facility or facilities. As OCPs are persistent in the environment and the impacts to soil are shallow and limited in extent, excavation and off-site disposal of affected soils is a common, practical, and efficient approach to meet these remediation objectives. Following off-Site removal of the affected soil, clean imported soil will be emplaced in the remedial excavations.

At the completion of Site soil removal activities and after confirmation that the soil RAGs have been achieved, EKI will prepare a Completion Report on behalf of POST that will describe implementation of the Site soil remedial actions.

1.2 Work Plan Elements

This Work Plan contains the following elements:

- A discussion of Site setting, background, and use history;
- Summary of results of previous soil sampling;
- A description of the proposed remedial action approach, post-excavation confirmation soil sampling plan, and backfill/site restoration plan;
- Anticipated project schedule and timing; and
- A description of the post-removal action Completion Report elements.

2 SITE BACKGROUND

2.1 Site Location, Setting, Current Uses

The approximately 2.75-acre San Gregorio Ranch property is located at 190 La Honda Road (Highway 84) in San Mateo County, California (the Site, see Figure 1). The Assessor's Parcel Number (APN) for the Site is 081-021-130. The Site is occupied by a rural residence constructed in the early 1900s. Various out-buildings, pens, and sheds have been removed. The Site lies at a surface elevation of approximately 120 feet above mean sea level, and is immediately north of San Gregorio Creek.

The Site is currently unoccupied, but could be returned to residential use for a caretaker upon site remediation.

2.2 Pesticides Detected in Soil at the Site

During POST's pre-acquisition due diligence period, a sampling investigation identified the presence of certain pesticides in shallow soils around the ranch residence and in the vicinity of former Site structures that dated back to before the 1970s (discussed further in Section 3, below). The pesticides detected in soil included chlordane and DDT compounds, which likely were legally applied at the time. The Site is directly adjacent to the banks and mouth of San Gregorio Creek, an estuary that supports sensitive species such as the endangered coho salmon (*Oncorhynchus kisutch*) and tidewater goby (*Eucyclogobius newberryi*), and threatened steelhead trout (*Oncorhynchus mykiss*).

2.3 POST's Objectives for Site

POST will acquire the greater San Gregorio Ranch later in May 2026 and desires to remove certain areas of pesticide-affected soils at the Site and place clean, imported soils back into the excavations (discussed in Section 4) in order to improve the health and natural resource value of the Site. The removal of pesticide-affected soils and off-Site disposal at an appropriately-permitted disposal facility will contribute to conservation efforts by helping to protect the quality of on-Site resources, as well as to prevent potential harm to San Gregorio Creek. This soil removal work will take place with appropriate erosion control measures in place, as discussed in Section 4, and does not involve any significant vegetation removal.

POST has protected the entire 238-acre ranch property with a conservation easement that holds conservation values over the health of the soil, riparian areas, and live trees for more than 30 years. This conservation easement is being considered for modification under POST's fee ownership to expand the protections around the riparian corridor by restricting additional use or development, before transferring the entire property to California State Parks.

3 NATURE AND EXTENT OF CHLORDANE AND DDT IN SOILS

In February 2025, EKI conducted an initial screening-level sampling survey for the presence of pesticides in soil at the Site, which included the collection and laboratory analysis of four (4) multi-increment (MI) surface soil samples from across the Site. The concentrations of chlordane in soil in these general areas ranged from 885 micrograms per kilogram (ug/kg) to 3,870 ug/kg, with three of the four MI surface soil samples containing chlordane above its RAG of 1,700 ug/kg (see Table 1; corresponding MI soil sample locations are shown on Figure 2).

In May of 2025, EKI returned to the Site to collect discrete soil samples from the surface and at various depths to further characterize and define that lateral and vertical extents of chlordane in soils at concentrations above its RAG. A total of 62 discrete soil samples were collected across the Site at depths ranging from 0.5 feet bgs to 1.5 feet below ground surface (bgs) (see Figure 2).

As shown in Table 1, 15 of the 62 total discrete soil samples collected contained chlordane at concentrations above its RAG of 1,700 ug/kg. Also, 6 of the 62 discrete soil samples collected contained chlordane at concentrations above its threshold of 2,500 ug/kg for designation as a California non-RCRA hazardous waste (see Table 1). The highest concentrations of chlordane were located generally around the base of the residential dwelling on the Site and in locations where other structures previously existed on the Site, based on a review of historical aerial photographs. The presence of elevated chlordane at these locations on the Site is likely due to the past, likely legal, application of chlordane-containing pesticides, e.g., termiticides, insecticides, around the base of structures at the Site.

The pesticides DDE, DDD, and DDT were detected in shallow soil (0.5-foot and 1.5-foot depths) at one location on the Site (sample location FarmhouseD_9) in the northwest portion of the Site (see Figure 2) at concentrations above their RAGs (current RWQCB residential ESLs) of 2,000 ug/kg, 2,300 ug/kg, and 1,900 ug/kg, respectively (see Table 1). DDE, DDD, and DDT were detected in soil at concentrations ranging up to 7,930 ug/kg, 3,100 ug/kg, and 30,500 ug/kg, respectively. Given that this area of the Site also contains chlordane in soil above its RAG, as discussed below, this area of the Site is planned for excavation. Thus, it is expected that the DDE/DDD/DDT-affected soils will be removed as part of that excavation.

4 PROPOSED SOIL REMOVAL ACTION IMPLEMENTATION

The planned removal action at the Site entails excavation of chlordane and DDD/DDE/DDT-affected soils to achieve the remedial goal of 1,700 ug/kg for chlordane and 2,300 ug/kg, 2,000 ug/kg, and 1,900 ug/kg for DDD, DDE, and DDT, respectively, which are the current RWQCB residential direct exposure ESLs (RWQCB, 2026), and are consistent with unrestricted land use. The excavated soil will be disposed offsite at permitted disposal facilities and the excavations backfilled.

4.1 Proposed Soil Remediation Areas

Based on the review of the soil analytical results, EKI identified six distinct areas of the Site where chlordane concentrations in soil exceed its remedial goal, requiring excavation and off-Site disposal. Addressing the chlordane-affected soils will simultaneously remove the co-located DDD/DDE/DDT-affected soils. These six areas are shown approximately on Figure 3. As shown on Figure 3, based on the soil data:

- One area requires excavation to 1 foot bgs,
- One area requires soil excavation to 1.5 feet bgs,
- Two areas require soil excavation to 2 feet bgs, and
- Two areas require soil excavation to 2.5 feet bgs.

The final depths and lateral extents of the soil excavation areas will be determined by post-excavation confirmation soil sampling and analysis, and comparison of the results to the RAGs.

Based on the soil data and proposed lateral and vertical extents of soil excavation areas as shown on Figure 3, it is anticipated that approximately 1,600 cubic yards of soil will require excavation and off-Site disposal. The total planned excavation area measures approximately 22,000 square feet (0.5 acres). Implementation of the soil removal action consists of a series of separate tasks, as described below. POST's environmental consultant, EKI, will provide construction oversight during the work to document the soil removal action is conducted in accordance with this Work Plan.

4.2 Contractor's Licensing and Training

Work activities at the Site will be performed by a California-licensed contractor retained by POST (hereinafter "Contractor") with a hazardous substance removal certificate ("A-haz" contractor) and personnel with training in hazardous waste operations (40-hour Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) Training). The Contractor will be required to perform several pre-field activities prior to the initiation of soil remediation activities as discussed in this section.

4.3 Site Preparation Activities

4.3.1 Delineation of Initial Excavation Areas

Based on existing soil data, the lateral extents of Site areas requiring soil removal as well as anticipated excavation depths are shown on Figure 3. Prior to excavation, EKI will mark the extents of these initial soil excavation areas for the excavation contractor using wood stakes, flags, or other appropriate field marking measures.

4.3.2 Utility Clearance

Prior to initiating excavation activities, the Contractor will notify Underground Services Alert (USA) at least two working days in advance of initiating Site excavation activities to identify the locations of existing utilities in the planned excavation areas. In addition, the Contractor will survey and/or may elect to retain a private utility locator to assist in the location of existing buried utilities within the planned excavation areas.

4.3.3 Initial Site Preparation

Prior to initiation of soil excavation activities, the Contractor's field crew will conduct initial mobilization activities that are non-invasive. These activities may include reviewing access constraints and proposed excavation areas, marking trees to be preserved, constructing a decontamination pad, preparing for dust control and stormwater management measures, and other pre-excavation activities. The Contractor will implement measures to prevent erosion and sediment runoff. As the work is expected to occur during the summer, the likelihood of stormwater or erosion is significantly less than in the winter months. In an abundance of caution, the Contractor will install a silt fence along the southern Site boundary between the excavation area and the San Gregorio Creek bank to limit the potential for sediment to migrate from excavation areas to the creek. The existing vegetated buffer between the active construction area and San Gregorio Creek will be protected and no vegetation removal will occur in the buffer area.

4.3.4 Permitting

The Contractor will not be required to file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB), as the disturbed area at the Site is anticipated to be less than one acre in total area. However, a Storm Water BMP Plan will be prepared and implemented by the Contractor during the work.

4.3.5 Health and Safety Plan

The Contractor will be responsible for operating in accordance with the most current requirements of Title 8, California Code of Regulations, section 5192 (8 CCR 5192) and Title 29, Code of Federal Regulations, section 1910.120 (29 CFR 1910.120), Standards for Hazardous Waste Operations and Emergency Response (HAZWOPER). On-Site personnel are responsible for operating in accordance with all applicable regulations of the OSHA outlined in 8 CCR General Industry and Construction Safety Orders and 29 CFR 1910 and 29 CFR 1926, Construction Industry Standards, as well as other applicable federal, state and local laws and regulations. All personnel will operate in compliance with all California OSHA requirements. EKI will prepare a Site-specific health and safety plan (HASP) for its personnel. The Contractor will prepare its own HASP to be at least as stringent as the EKI HASP.

4.4 Soil Excavation and Stockpiling Methodology

Soil excavation will be completed initially to the anticipated depths and lateral extents as shown on Figure 3. Following completion of initial excavation, excavation bottom and perimeter confirmation soil samples will be collected and submitted for analysis to confirm the RAGs have been achieved. Depending on the initial post-excavation confirmation soil sample results, over-excavation of some areas may be required to achieve the soil RAGs.

4.4.1 Excavation Equipment and Methods

EKI anticipates that the soil excavation project can be accomplished with standard construction equipment. Some of the equipment expected to be used at the Site includes hydraulic excavators, backhoes, water trucks, end dump trucks, bulldozers, and compactors. Hand tools, e.g., shovels, may be

used in areas where access does not allow for use of larger equipment, or where tree trunks and/or roots need to be protected.

Excavated soils will be transported by the Contractor to a temporary staging area on-Site for stockpiling and waste characterization sampling, as discussed below.

4.4.2 Excavated Soil Stockpile Management

Stockpiled soil will be handled as potentially hazardous waste until demonstrated otherwise. Stockpiled soil will be placed on plastic sheeting (minimum 10-mil thickness), not on exposed soil surfaces, and securely covered with plastic sheeting (minimum 10-mil thickness). All stockpiles will be covered at the end of each workday and when not being actively handled. After stockpile sampling, waste classification, and waste acceptance by the selected disposal facilities, the stockpiles will be loaded onto trucks for transportation to appropriately-permitted off-Site disposal facilities.

4.5 Post-Excavation Confirmation Soil Sampling

Following the initial soil excavation, post-excavation bottom and perimeter confirmation soil samples will be collected for laboratory analysis for chlordane and DDD/DDE/DDT to assess whether the respective RAGs have been achieved or whether additional soil removal is warranted to achieve the objectives.

Once the soil RAGs have been achieved in all initial and/or subsequent confirmation samples, the final limits of the excavations will be recorded by EKI using a field GPS unit, the coordinates will be documented in the Completion Report.

4.6 Stockpile Sampling and Laboratory Analyses for Off-Site Disposal Profiling

The excavated stockpiled soil planned for off-Site disposal will be sampled and profiled in accordance with the requirements of the proposed accepting facility. The laboratory analyses required by the facility may include petroleum hydrocarbons, full range of OCPs, and metals.

4.7 Off-site Disposal

The excavated soils will be transported off-Site by an appropriately licensed transporter. The necessary documents, such as the bills of landing and/or hazardous waste manifest forms, will be completed and accompany the driver to the disposal facility. The Contractor will review the manifests and observe trucks leaving the Site to document that the vehicles were loaded at the Site and appropriately covered in accordance with Department of Transportation (DOT) regulations and that the manifests were appropriately completed. The Contractor will prepare a written log of these activities.

4.8 Backfill of Excavations and Site Restoration

After excavation activities are completed and RAGs have been achieved as demonstrated through post-excavation confirmation soil sampling, the excavated areas will be backfilled with imported fill. Characterization, i.e., sampling, of the import material will be conducted in accordance with the DTSC's import fill guidance (DTSC, 2001). The import fill soil will not contain chemicals at concentrations above their RWQCB residential ESLs or above typical background concentrations.

Following backfill of the excavations, the area will be graded and finished to match the existing slope and topography of the Site. The grading will be performed such that there are no depressions remaining and such that the potential for soil erosion is minimized. Temporary erosion control measures, e.g., silt fences, will be employed, as needed. The existing vegetated buffer between the Site and San Gregorio Creek will be maintained. POST will likely hydroseed the area to promote vegetative growth.

5 Project Timing and Report of Completion

5.1 Timing of Soil Removal Activities

Soil removal activities at the Site are anticipated to commence during the Summer of 2026, and are expected to take approximately two months to complete on-Site, with the off-Site soil disposal and reporting to occur one to two months following completion of soil excavation activities. Anticipated timing of the project by key phase or task is presented below.

Site preparation	2 weeks
Soil excavation and stockpiling	1 to 2 weeks
Confirmation sampling and receipt of results	1 to 2 weeks
Additional soil excavation, if needed	Several days
Additional confirmation sampling and results	1 week
Stockpile sampling and receipt of results	1 to 2 weeks
Stockpile profiling, waste acceptance and removal	2 to 4 weeks
Backfill, grading, erosion control, and revegetation	(concurrent with soil removal)
Preparation of Completion Report	2 weeks*

* Completion Report can be prepared within two weeks following receipt of all waste disposal documentation, e.g., manifests, weigh tickets, from Contractor.

5.2 Removal Action Completion Report

After the completion of Site remediation activities, e.g., achievement of the soil RAGs, removal of the soil stockpiles from the Site and receipt of fully signed waste manifests, and backfill, EKI will prepare a Completion Report on behalf of POST that will describe implementation of the Site remediation activities. The report will contain the following components:

- Summary of Site soil remediation field activities, methods and procedures, and key observations;
- Documentation that soil RAGs have been achieved at all excavation areas;
- Documentation of laboratory analytical results for confirmation and stockpile soil sampling, or other sampling needs as deemed necessary based on field observations and conditions;
- Documentation of quantities and destination of soil disposed off-Site, including manifests or bills of lading for the disposed soil; and
- Documentation of final extents of excavation, Site re-grading, and site restoration.

6 References

- DTSC, 2001. *DTSC Information Advisory Clean Imported Fill Material Fact Sheet*. California Department of Toxic Substances Control (DTSC), October 2001.
- EKI, 2025. *Phase I Environmental Site Assessment and Results of Phase II Sampling Investigation, San Gregorio Ranch, Highway 1 and Highway 84, San Mateo County, California*, EKl, dated 19 May 2025.
- RWQCB, 2026. *Environmental Screening Levels (ESLs) Revision 4*. San Francisco Bay Regional Water Quality Control Board, 20 January 2026.

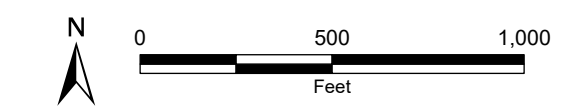


Regional Map

Site

Legend

 Site Boundary



Site Location

San Gregorio Ranch
 190 La Honda Road
 San Mateo County, CA
 May 2026
 C40222.00

Notes

1. All locations are approximate.
2. Basemap - ESRI World Topographic Map.



Figure 1

X:\C40222\maps_00\2026\05\SanGregorioRanchPhase1.aprx- Fig1_ SiteLocation



Legend

- Approximate Subject Property Boundary
- - - - MI Surface Soil Sampling Area and Sample ID (EKI, 18 February 2025)
- 0-0.5 feet and 1-1.5 foot deep discrete soil sample location (EKI, 5 May 2025)
- 0-0.5 feet, 1-1.5 foot, and 2-2.5 foot deep discrete soil sample location (EKI, 5 May 2025)

Abbreviations

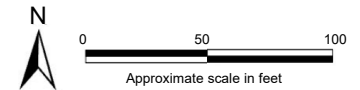
MI = Multi-Increment

Notes

1. All locations are approximate.

Basemap Source

1. Parcel boundaries from parcel dataset dated 2014 and published by Information Center for the Environment in July 2020.
2. Aerial imagery from Near Maps, dated July 2017

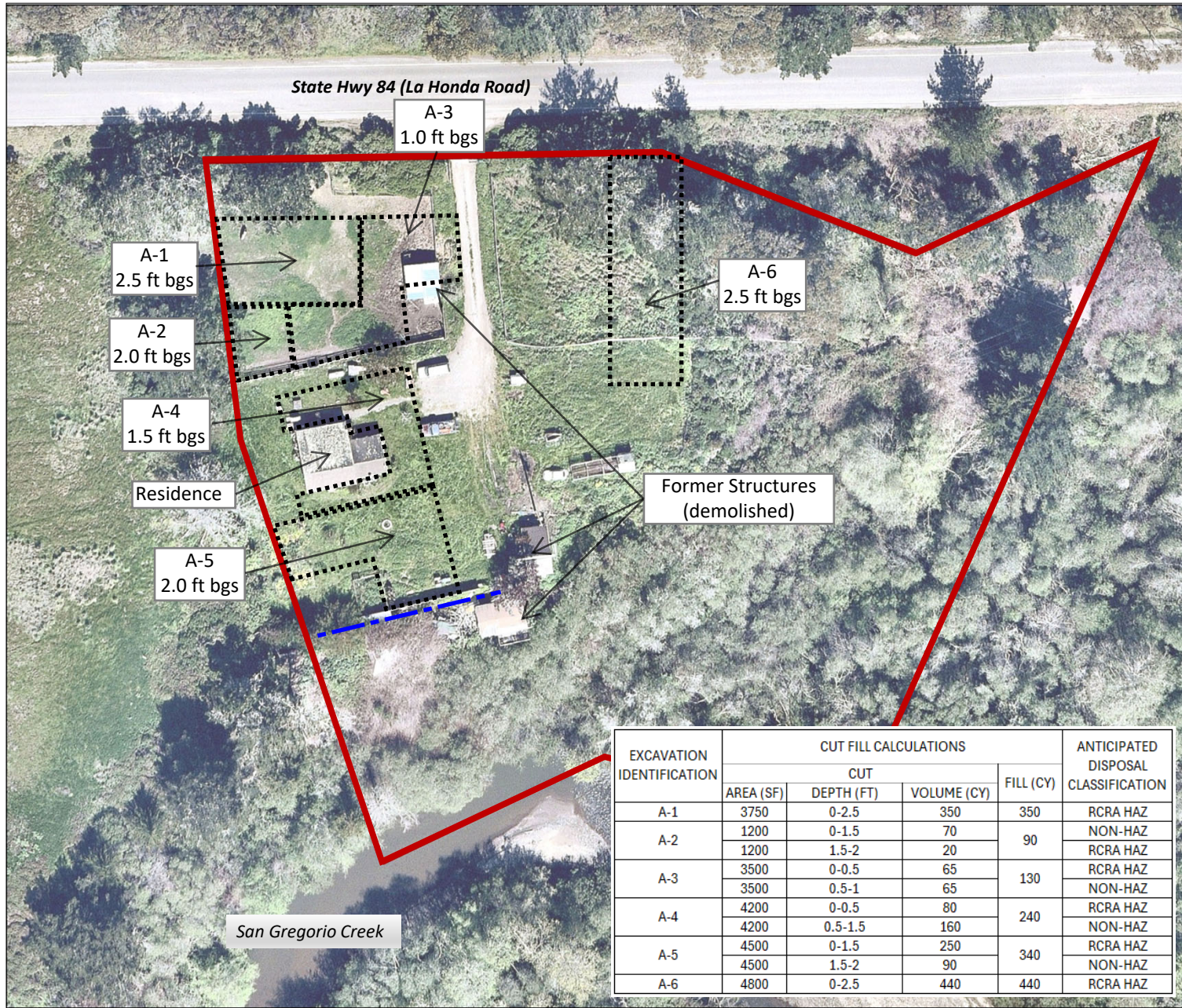


Discrete Soil Sampling Locations

San Gregorio Ranch
 190 La Honda Road
 San Mateo County, CA
 May 2026
 EKI C40222.00



Figure 2

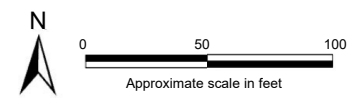


- Legend**
- Approximate Site Boundary
 - Approximate Planned Soil Excavation Extent
- | | |
|------------|--|
| A-1 | Excavation Identification |
| 2.5 ft bgs | Approximate Planned Depth of Soil Excavation |
- - - - Approximate Planned Location of Silt Fence

Abbreviations
ft bgs: feet below ground surface

- Notes**
1. All locations are approximate.
 2. Initial excavation extents and silt fence to be marked in field by Client Representative.
 3. Contractor to trace and mark utilities (water supply, gas, and septic/leach field lines) prior to performing any excavation. Septic and leach field location unknown.
 4. Contractor may be directed by Client Representative to perform over-excavation laterally and vertically beyond the initial limits and depths based on the results of confirmation sampling performed by Client Representative.
 5. Contractor shall stockpile soil from each excavation area in a separately lined stockpile area prior to off-site transportation and disposal.
 6. Contractor shall dispose of excavated materials in accordance with Laws and Regulations. Dispose of hazardous wastes in appropriately permitted disposal facilities.
 7. Contractor shall repair any damage to public roads caused by hauling activity.
 8. Trucks must comply with favorably-reviewed Transportation Plan and Traffic Control Plan.

- Basemap Source**
1. Parcel boundaries from parcel dataset dated 2014 and published by Information Center for the Environment in July 2020.
 2. Aerial imagery from Near Maps, dated July 2017



EXCAVATION IDENTIFICATION	CUT FILL CALCULATIONS			FILL (CY)	ANTICIPATED DISPOSAL CLASSIFICATION
	AREA (SF)	CUT DEPTH (FT)	VOLUME (CY)		
A-1	3750	0-2.5	350	350	RCRA HAZ
	1200	0-1.5	70		NON-HAZ
A-2	1200	1.5-2	20	90	RCRA HAZ
	3500	0-0.5	65		RCRA HAZ
A-3	3500	0.5-1	65	130	NON-HAZ
	4200	0-0.5	80		RCRA HAZ
A-4	4200	0.5-1.5	160	240	NON-HAZ
	4500	0-1.5	250		RCRA HAZ
A-5	4500	1.5-2	90	340	NON-HAZ
	4800	0-2.5	440		RCRA HAZ

Planned Soil Excavation Extents

San Gregorio Ranch
190 La Honda Road
San Mateo County, CA



May 2026
EKI C40222.00
Figure 3



SAN MATEO COUNTYWIDE

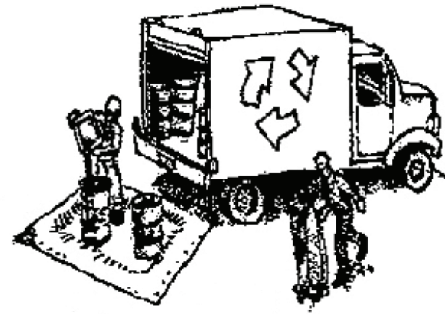
Water Pollution Prevention Program

Clean Water. Healthy Community.

Construction Best Management Practices (BMPs)

Construction projects are required to implement the stormwater best management practices (BMP) on this page, as they apply to your project, all year long.

Materials & Waste Management



Non-Hazardous Materials

- ❑ Berm and cover stockpiles of sand, dirt or other construction material with tarps when rain is forecast or if not actively being used within 14 days.
- ❑ Use (but don't overuse) reclaimed water for dust control.

Hazardous Materials

- ❑ Label all hazardous materials and hazardous wastes (such as pesticides, paints, thinners, solvents, fuel, oil, and antifreeze) in accordance with city, county, state and federal regulations.
- ❑ Store hazardous materials and wastes in water tight containers, store in appropriate secondary containment, and cover them at the end of every work day or during wet weather or when rain is forecast.
- ❑ Follow manufacturer's application instructions for hazardous materials and be careful not to use more than necessary. Do not apply chemicals outdoors when rain is forecast within 24 hours.
- ❑ Arrange for appropriate disposal of all hazardous wastes.

Waste Management

- ❑ Cover waste disposal containers securely with tarps at the end of every work day and during wet weather.
- ❑ Check waste disposal containers frequently for leaks and to make sure they are not overfilled. Never hose down a dumpster on the construction site.
- ❑ Clean or replace portable toilets, and inspect them frequently for leaks and spills.
- ❑ Dispose of all wastes and debris properly. Recycle materials and wastes that can be recycled (such as asphalt, concrete, aggregate base materials, wood, gyp board, pipe, etc.)
- ❑ Dispose of liquid residues from paints, thinners, solvents, glues, and cleaning fluids as hazardous waste.

Construction Entrances and Perimeter

- ❑ Establish and maintain effective perimeter controls and stabilize all construction entrances and exits to sufficiently control erosion and sediment discharges from site and tracking off site.
- ❑ Sweep or vacuum any street tracking immediately and secure sediment source to prevent further tracking. Never hose down streets to clean up tracking.

Equipment Management & Spill Control



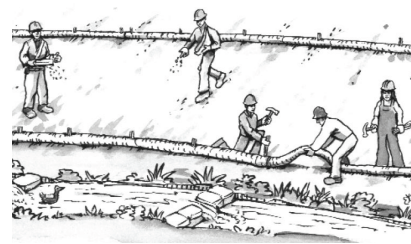
Maintenance and Parking

- ❑ Designate an area, fitted with appropriate BMPs, for vehicle and equipment parking and storage.
- ❑ Perform major maintenance, repair jobs, and vehicle and equipment washing off site.
- ❑ If refueling or vehicle maintenance must be done onsite, work in a bermed area away from storm drains and over a drip pan or drop cloths big enough to collect fluids. Recycle or dispose of fluids as hazardous waste.
- ❑ If vehicle or equipment cleaning must be done onsite, clean with water only in a bermed area that will not allow rinse water to run into gutters, streets, storm drains, or surface waters.
- ❑ Do not clean vehicle or equipment onsite using soaps, solvents, degreasers, or steam cleaning equipment.

Spill Prevention and Control

- ❑ Keep spill cleanup materials (e.g., rags, absorbents and cat litter) available at the construction site at all times.
- ❑ Inspect vehicles and equipment frequently for and repair leaks promptly. Use drip pans to catch leaks until repairs are made.
- ❑ Clean up spills or leaks immediately and dispose of cleanup materials properly.
- ❑ Do not hose down surfaces where fluids have spilled. Use dry cleanup methods (absorbent materials, cat litter, and/or rags).
- ❑ Sweep up spilled dry materials immediately. Do not try to wash them away with water, or bury them.
- ❑ Clean up spills on dirt areas by digging up and properly disposing of contaminated soil.
- ❑ Report significant spills immediately. You are required by law to report all significant releases of hazardous materials, including oil. To report a spill: 1) Dial 911 or your local emergency response number, 2) Call the Governor's Office of Emergency Services Warning Center, (800) 852-7550 (24 hours).

Earthmoving



- ❑ Schedule grading and excavation work during dry weather.
- ❑ Stabilize all denuded areas, install and maintain temporary erosion controls (such as erosion control fabric or bonded fiber matrix) until vegetation is established.
- ❑ Remove existing vegetation only when absolutely necessary, and seed or plant vegetation for erosion control on slopes or where construction is not immediately planned.
- ❑ Prevent sediment from migrating offsite and protect storm drain inlets, gutters, ditches, and drainage courses by installing and maintaining appropriate BMPs, such as fiber rolls, silt fences, sediment basins, gravel bags, berms, etc.
- ❑ Keep excavated soil on site and transfer it to dump trucks on site, not in the streets.

Contaminated Soils

- ❑ If any of the following conditions are observed, test for contamination and contact the Regional Water Quality Control Board:
 - Unusual soil conditions, discoloration, or odor.
 - Abandoned underground tanks.
 - Abandoned wells
 - Buried barrels, debris, or trash.

Paving/Asphalt Work



- ❑ Avoid paving and seal coating in wet weather or when rain is forecast, to prevent materials that have not cured from contacting stormwater runoff.
- ❑ Cover storm drain inlets and manholes when applying seal coat, tack coat, slurry seal, fog seal, etc.
- ❑ Collect and recycle or appropriately dispose of excess abrasive gravel or sand. Do NOT sweep or wash it into gutters.
- ❑ Do not use water to wash down fresh asphalt concrete pavement.

Sawcutting & Asphalt/Concrete Removal

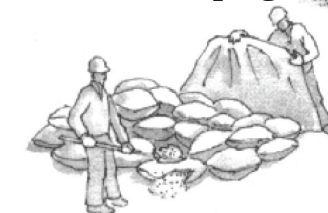
- ❑ Protect nearby storm drain inlets when saw cutting. Use filter fabric, catch basin inlet filters, or gravel bags to keep slurry out of the storm drain system.
- ❑ Shovel, absorb, or vacuum saw-cut slurry and dispose of all waste as soon as you are finished in one location or at the end of each work day (whichever is sooner!).
- ❑ If sawcut slurry enters a catch basin, clean it up immediately.

Concrete, Grout & Mortar Application



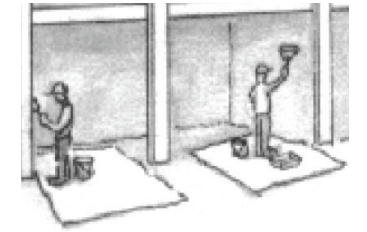
- ❑ Store concrete, grout, and mortar away from storm drains or waterways, and on pallets under cover to protect them from rain, runoff, and wind.
- ❑ Wash out concrete equipment/trucks offsite or in a designated washout area, where the water will flow into a temporary waste pit, and in a manner that will prevent leaching into the underlying soil or onto surrounding areas. Let concrete harden and dispose of as garbage.
- ❑ When washing exposed aggregate, prevent washwater from entering storm drains. Block any inlets and vacuum gutters, hose washwater onto dirt areas, or drain onto a bermed surface to be pumped and disposed of properly.

Landscaping



- ❑ Protect stockpiled landscaping materials from wind and rain by storing them under tarps all year-round.
- ❑ Stack bagged material on pallets and under cover.
- ❑ Discontinue application of any erodible landscape material within 2 days before a forecast rain event or during wet weather.

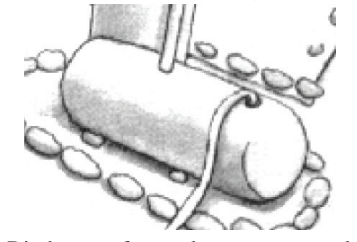
Painting & Paint Removal



Painting Cleanup and Removal

- ❑ Never clean brushes or rinse paint containers into a street, gutter, storm drain, or stream.
- ❑ For water-based paints, paint out brushes to the extent possible, and rinse into a drain that goes to the sanitary sewer. Never pour paint down a storm drain.
- ❑ For oil-based paints, paint out brushes to the extent possible and clean with thinner or solvent in a proper container. Filter and reuse thinners and solvents. Dispose of excess liquids as hazardous waste.
- ❑ Paint chips and dust from non-hazardous dry stripping and sand blasting may be swept up or collected in plastic drop cloths and disposed of as trash.
- ❑ Chemical paint stripping residue and chips and dust from marine paints or paints containing lead, mercury, or tributyltin must be disposed of as hazardous waste. Lead based paint removal requires a state-certified contractor.

Dewatering



- ❑ Discharges of groundwater or captured runoff from dewatering operations must be properly managed and disposed. When possible send dewatering discharge to landscaped area or sanitary sewer. If discharging to the sanitary sewer call your local wastewater treatment plant.
- ❑ Divert run-on water from offsite away from all disturbed areas.
- ❑ When dewatering, notify and obtain approval from the local municipality before discharging water to a street gutter or storm drain. Filtration or diversion through a basin, tank, or sediment trap may be required.
- ❑ In areas of known or suspected contamination, call your local agency to determine whether the ground water must be tested. Pumped groundwater may need to be collected and hauled off-site for treatment and proper disposal.

Storm drain polluters may be liable for fines of up to \$10,000 per day!

TABLE 1
Multi-Increment and Discrete Soil Sample Analytical Results for Organochlorine Pesticides

San Gregorio Ranch, 190 La Honda Road, San Mateo County, CA

Soil Sample ID	Soil Sample Depth (ft bgs)	Sample Date	Analytical Results (µg/kg) (a)								
			4,4'-DDE	4,4'-DDD	4,4'-DDT	Dieldrin	Chlordane	Heptachlor	Heptachlor Epoxide	Endosulfan Sulfate	Endosulfan I
Multi-Increment Soil Samples (February 2025)											
MI-FarmhouseA_2502	Surface	2/18/2025	337	90.7	253	ND	3,870	4.51	22.9	4.23	ND
MI-FarmhouseB_2502	Surface	2/18/2025	353	113	366	ND	3,720	4.08	17.3	3.39	ND
MI-FarmhouseC_2502	Surface	2/18/2025	25.6	8.26	18.4	ND	1,980	<2.86	9.2	<2.86	ND
MI-FarmhouseD_2502	Surface	2/18/2025	92.5	33.4	61.8	ND	885	<2.82	8.93	<2.82	ND
Discrete Soil Samples (May 2025)											
Farmhouse A											
FarmhouseA_1-0.5	0.5	5/5/2025	297	93.8	192	ND	4,370	ND	17.0	2.97	53.4
FarmhouseA_1-1.5	1.5	5/5/2025	154	67.6	81.3	ND	2,260	ND	14.9	ND	28.0
FarmhouseA_2-0.5	0.5	5/5/2025	5.70	3.07	3.37	ND	129	ND	ND	ND	ND
FarmhouseA_2-1.5	1.5	5/5/2025	ND	ND	ND	ND	35.0	ND	ND	ND	ND
FarmhouseA_3-0.5	0.5	5/5/2025	539	156	246	19.1	4,040	2.40	24.9	5.28	91.6
FarmhouseA_3-1.5	1.5	5/5/2025	459	137	161	19.9	2,010	ND	29.8	4.46	89.2
FarmhouseA_4-0.5	0.5	5/5/2025	35.5	18.9	19.5	ND	964	ND	4.92	ND	10.0
FarmhouseA_4-1.5	1.5	5/5/2025	ND	ND	ND	ND	15.6	ND	ND	ND	ND
FarmhouseA_5-0.5	0.5	5/5/2025	16.7	14.3	15.2	ND	189	ND	ND	ND	ND
FarmhouseA_5-1.5	1.5	5/5/2025	8.30	6.72	5.70	ND	54.9	ND	ND	ND	ND
FarmhouseA_6-0.5	0.5	5/5/2025	16.7	21.6	20.1	ND	173	ND	ND	ND	ND
FarmhouseA_6-1.5	1.5	5/5/2025	2.81	3.64	ND	ND	23.5	ND	ND	ND	ND
Farmhouse B											
FarmhouseB_1-0.5	0.5	5/5/2025	52.0	22.0	16.7	ND	711	ND	3.69	ND	8.92
FarmhouseB_1-1.5	1.5	5/5/2025	30.9	13.4	6.61	ND	451	ND	2.56	ND	6.05
FarmhouseB_1-2.5	2.5	5/5/2025	ND	ND	ND	ND	27.4	ND	ND	ND	ND
FarmhouseB_2-0.5	0.5	5/5/2025	75.1	40.1	23.5	4.51	2,430	ND	14.5	ND	29.3
FarmhouseB_2-1.5	1.5	5/5/2025	18.4	2.79	ND	ND	714	ND	11.3	ND	8.82
FarmhouseB_2-2.5	2.5	5/5/2025	10.5	ND	ND	ND	384	ND	6.21	ND	4.38
FarmhouseB_3-0.5	0.5	5/5/2025	654	264	178	4.54	1,950	ND	9.99	ND	21.9
FarmhouseB_3-1.5	1.5	5/5/2025	891	140	56.0	ND	1,550	ND	9.61	ND	18.6
FarmhouseB_3-2.5	2.5	5/5/2025	207	19.3	89.2	ND	448	ND	2.90	ND	5.10
FarmhouseB_4-0.5	0.5	5/5/2025	309	59.9	401	ND	1,840	ND	8.85	ND	22.0
FarmhouseB_4-1.5	1.5	5/5/2025	16.2	2.71	8.80	ND	147	ND	ND	ND	ND
FarmhouseB_4-2.5	2.5	5/5/2025	48.8	10.7	35.3	ND	323	ND	3.58	ND	ND
FarmhouseB_5-0.5	0.5	5/5/2025	79.6	24.3	118	ND	722	ND	6.03	ND	8.47
FarmhouseB_5-1.5	1.5	5/5/2025	35.4	9.89	36.3	ND	427	ND	4.35	ND	5.37
FarmhouseB_6-0.5	0.5	5/5/2025	3.54	ND	5.51	ND	92.2	ND	ND	ND	ND
FarmhouseB_6-1.5	1.5	5/5/2025	ND	ND	2.61	ND	27.8	ND	ND	ND	ND
FarmhouseB_7-0.5	0.5	5/5/2025	ND	ND	ND	ND	7.61	ND	ND	ND	ND
FarmhouseB_7-1.5	1.5	5/5/2025	ND	ND	ND	ND	ND	ND	ND	ND	ND
FarmhouseB_8-0.5	0.5	5/5/2025	9.10	13.0	14.6	ND	2,450	2.83	7.82	ND	30.1
FarmhouseB_8-1.5	1.5	5/5/2025	ND	ND	ND	ND	257	ND	ND	ND	ND
FarmhouseB_9-0.5	0.5	5/5/2025	2.34	ND	ND	ND	41.7	ND	ND	ND	ND
FarmhouseB_9-1.5	1.5	5/5/2025	ND	ND	ND	ND	4.52	ND	ND	ND	ND

TABLE 1
Multi-Increment and Discrete Soil Sample Analytical Results for Organochlorine Pesticides

San Gregorio Ranch, 190 La Honda Road, San Mateo County, CA

Soil Sample ID	Soil Sample Depth (ft bgs)	Sample Date	Analytical Results (µg/kg) (a)								
			4'-DDE	4'-DDD	4'-DDT	Dieldrin	Chlordane	Heptachlor	Heptachlor Epoxide	Endosulfan Sulfate	Endosulfan I
Farmhouse C											
FarmhouseC_1-0.5	0.5	5/5/2025	15.5	3.48	5.95	ND	375	ND	2.38	ND	4.74
FarmhouseC_1-1.5	1.5	5/5/2025	36.8	13.1	22.8	ND	2,060	ND	7.99	2.73	20.9
FarmhouseC_2-0.5	0.5	5/5/2025	73.1	15.4	27.1	ND	2,080	ND	12.3	ND	27.6
FarmhouseC_2-1.5	1.5	5/5/2025	10.7	ND	ND	ND	318	ND	ND	ND	4.01
FarmhouseC_3-0.5	0.5	5/5/2025	27.2	12.8	15.8	ND	2,410	ND	11.1	3.53	29.0
FarmhouseC_3-1.5	1.5	5/5/2025	57.9	18.5	21.7	ND	3,010	ND	17.2	2.78	39.4
FarmhouseC_4-0.5	0.5	5/5/2025	19.5	2.25	12.6	ND	18.4	ND	ND	ND	ND
FarmhouseC_4-1.5	1.5	5/5/2025	22.2	ND	9.16	ND	5.18	ND	ND	ND	ND
FarmhouseC_5-0.5	0.5	5/5/2025	ND	ND	ND	ND	7.91	ND	ND	ND	ND
FarmhouseC_5-1.5	1.5	5/5/2025	ND	ND	ND	ND	ND	ND	ND	ND	ND
Farmhouse D											
FarmhouseD_1-0.5	0.5	5/5/2025	16.8	5.28	20.3	ND	347	ND	ND	3.27	ND
FarmhouseD_1-1.5	1.5	5/5/2025	10.8	2.93	6.63	ND	117	ND	ND	ND	ND
FarmhouseD_2-0.5	0.5	5/5/2025	17.7	11.8	29.4	ND	265	ND	ND	2.68	ND
FarmhouseD_2-1.5	1.5	5/5/2025	14.1	6.88	17.9	ND	83.5	ND	ND	ND	ND
FarmhouseD_3-0.5	0.5	5/5/2025	4.40	ND	3.92	ND	51.0	ND	ND	ND	ND
FarmhouseD_3-1.5	1.5	5/5/2025	2.35	ND	ND	ND	17.2	ND	ND	ND	ND
FarmhouseD_4-0.5	0.5	5/5/2025	3.89	ND	ND	ND	9.13	ND	ND	ND	ND
FarmhouseD_4-1.5	1.5	5/5/2025	2.64	ND	ND	ND	4.27	ND	ND	ND	ND
FarmhouseD_5-0.5	0.5	5/5/2025	92.0	34.1	50.2	ND	528	ND	4.77	ND	6.45
FarmhouseD_5-1.5	1.5	5/5/2025	110	37.9	30.9	ND	3,690	ND	12.1	ND	34.8
FarmhouseD_6-0.5	0.5	5/5/2025	68.8	21.2	15.9	ND	1,360	ND	9.42	ND	15.9
FarmhouseD_6-1.5	1.5	5/5/2025	63.3	20.9	14.2	ND	1,300	ND	8.66	ND	14.2
FarmhouseD_7-0.5	0.5	5/5/2025	ND	ND	ND	ND	9.75	ND	ND	ND	ND
FarmhouseD_7-1.5	1.5	5/5/2025	ND	ND	ND	ND	ND	ND	ND	ND	ND
FarmhouseD_8-0.5	0.5	5/5/2025	ND	ND	ND	ND	7.59	ND	ND	ND	ND
FarmhouseD_8-1.5	1.5	5/5/2025	ND	ND	ND	ND	ND	ND	ND	ND	ND
FarmhouseD_9-0.5	0.5	5/5/2025	7,930	1,410	19,800	8.3	3,340	2.34	58.0	ND	23.9
FarmhouseD_9-1.5	1.5	5/5/2025	4,260	3,110	30,500	7.93	3,080	2.53	36.0	ND	22.8
CA Hazardous Waste Criteria (TTL) (b)			1,000 (f)	1,000 (f)	1,000 (f)	8,000	2,500	4,700	4,700	--	--
RWQCB ESLs - Residential Direct Exposure (c)			2,000	2,300	1,900	34	1,700	130	70	--	470,000 (d)

Abbreviations:

ND - compound not detected at or above indicated method detection limit
 -- no screening level or hazardous waste threshold available
 ft bgs - feet below ground surface

µg/kg - micrograms per kilogram
 ESL - Environmental Screening Level
 TTL - Total Threshold Limit Concentration

Notes:

Bold value indicates that concentration of compound reported in sample exceeds its RWQCB Residential Direct Exposure ESL.

Underlined value indicates that concentration of compound reported in sample exceeds its TTL.

(a) Samples analyzed by K-Prime Inc., Santa Rosa, California. Concentrations reported as dry weight. Pesticides analyzed using U.S. EPA Method 3550/8081.

Only those pesticides detected above laboratory reporting limits in soil samples are shown on this table.

(b) Soil excavated and removed from the ground is considered a California hazardous waste if concentrations exceed the TTL criteria shown.

TTL values are from California Code of Regulations, Title 22, Division 4.5, Chapter 11, Article 3, Table III.

(c) Screening levels are the Shallow Soil Direct Exposure ESLs for the Residential Land Use Scenario (ESL Table S-1) (RWQCB, 2019).

(d) Value shown is for Endosulfan (total).

References:

RWQCB, 2026. Update to Environmental Screening Levels, California Regional Water Quality Control Board, Region 2, January 2026 (Revision 4).