

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2020080422

Project Title: Cargill Incorporated Solar Salt System Maintenance and Operations Activities Project

Lead Agency: San Francisco Bay Conservation and Development Commission Contact Person: Sam Fielding
 Mailing Address: 375 Beale Street, Suite 510 Phone: (415) 352 3665
 City: San Francisco Zip: 94105 County: San Francisco

Project Location: County: Alameda and San Mateo City/Nearest Community: Newark/Redwood City

Cross Streets: Alameda: Central Ave and Cherry Street/San Mateo: Seaport Blvd and E. Bayshore Rd. Zip Code: _____

Longitude/Latitude (degrees, minutes and seconds): 37 ° 32 ' 50 " N / 122 ° 06 ' 00 " W Total Acres: 12,100 (5 geographic areas)

Assessor's Parcel No.: See attached Table 1 Section: _____ Twp.: _____ Range: _____ Base: _____

Within 2 Miles: State Hwy #: 84/101 Waterways: San Francisco Bay, Alameda Creek, Coyote Creek, Redwood Creek, multiple sloughs

Airports: _____ Railways: Union Pacific Schools: No schools within 0.5 miles

Document Type:

- | | | | |
|--------------------------------------|--|------------------------------------|---|
| CEQA: <input type="checkbox"/> NOP | <input type="checkbox"/> Draft EIR | NEPA: <input type="checkbox"/> NOI | Other: <input type="checkbox"/> Joint Document |
| <input type="checkbox"/> Early Cons | <input type="checkbox"/> Supplement/Subsequent EIR | <input type="checkbox"/> EA | <input type="checkbox"/> Final Document |
| <input type="checkbox"/> Neg Dec | (Prior SCH No.) _____ | <input type="checkbox"/> Draft EIS | <input checked="" type="checkbox"/> Other: <u>Cert. Reg. Prog. EA</u> |
| <input type="checkbox"/> Mit Neg Dec | Other: _____ | <input type="checkbox"/> FONSI | _____ |

Local Action Type:

- | | | | |
|---|---|--|---|
| <input type="checkbox"/> General Plan Update | <input type="checkbox"/> Specific Plan | <input type="checkbox"/> Rezone | <input type="checkbox"/> Annexation |
| <input type="checkbox"/> General Plan Amendment | <input type="checkbox"/> Master Plan | <input type="checkbox"/> Prezone | <input type="checkbox"/> Redevelopment |
| <input type="checkbox"/> General Plan Element | <input type="checkbox"/> Planned Unit Development | <input type="checkbox"/> Use Permit | <input type="checkbox"/> Coastal Permit |
| <input type="checkbox"/> Community Plan | <input type="checkbox"/> Site Plan | <input type="checkbox"/> Land Division (Subdivision, etc.) | <input type="checkbox"/> Other: _____ |

Development Type:

- | | |
|---|--|
| <input type="checkbox"/> Residential: Units _____ Acres _____ | <input type="checkbox"/> Transportation: Type _____ |
| <input type="checkbox"/> Office: Sq.ft. _____ Acres _____ Employees _____ | <input type="checkbox"/> Mining: Mineral _____ |
| <input type="checkbox"/> Commercial: Sq.ft. _____ Acres _____ Employees _____ | <input type="checkbox"/> Power: Type _____ MW _____ |
| <input type="checkbox"/> Industrial: Sq.ft. _____ Acres _____ Employees _____ | <input type="checkbox"/> Waste Treatment: Type _____ MGD _____ |
| <input type="checkbox"/> Educational: _____ | <input type="checkbox"/> Hazardous Waste: Type _____ |
| <input type="checkbox"/> Recreational: _____ | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Water Facilities: Type _____ MGD _____ | |

Project Issues Discussed in Document:

- | | | | |
|--|--|---|--|
| <input type="checkbox"/> Aesthetic/Visual | <input type="checkbox"/> Fiscal | <input type="checkbox"/> Recreation/Parks | <input checked="" type="checkbox"/> Vegetation |
| <input type="checkbox"/> Agricultural Land | <input checked="" type="checkbox"/> Flood Plain/Flooding | <input type="checkbox"/> Schools/Universities | <input checked="" type="checkbox"/> Water Quality |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Forest Land/Fire Hazard | <input type="checkbox"/> Septic Systems | <input type="checkbox"/> Water Supply/Groundwater |
| <input checked="" type="checkbox"/> Archeological/Historical | <input checked="" type="checkbox"/> Geologic/Seismic | <input type="checkbox"/> Sewer Capacity | <input checked="" type="checkbox"/> Wetland/Riparian |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Minerals | <input checked="" type="checkbox"/> Soil Erosion/Compaction/Grading | <input type="checkbox"/> Growth Inducement |
| <input type="checkbox"/> Coastal Zone | <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Solid Waste | <input type="checkbox"/> Land Use |
| <input type="checkbox"/> Drainage/Absorption | <input type="checkbox"/> Population/Housing Balance | <input checked="" type="checkbox"/> Toxic/Hazardous | <input checked="" type="checkbox"/> Cumulative Effects |
| <input type="checkbox"/> Economic/Jobs | <input type="checkbox"/> Public Services/Facilities | <input checked="" type="checkbox"/> Traffic/Circulation | <input type="checkbox"/> Other: _____ |

Present Land Use/Zoning/General Plan Designation:

See attached Table 2

Project Description: (please use a separate page if necessary)

See attached

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".
If you have already sent your document to the agency please denote that with an "S".

<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> Office of Historic Preservation
<input type="checkbox"/> Boating & Waterways, Department of	<input type="checkbox"/> Office of Public School Construction
<input type="checkbox"/> California Emergency Management Agency	<input type="checkbox"/> Parks & Recreation, Department of
<input type="checkbox"/> California Highway Patrol	<input type="checkbox"/> Pesticide Regulation, Department of
<input checked="" type="checkbox"/> Caltrans District # <u>4</u>	<input type="checkbox"/> Public Utilities Commission
<input type="checkbox"/> Caltrans Division of Aeronautics	<input checked="" type="checkbox"/> Regional WQCB # <u>2</u>
<input type="checkbox"/> Caltrans Planning	<input type="checkbox"/> Resources Agency
<input type="checkbox"/> Central Valley Flood Protection Board	<input type="checkbox"/> Resources Recycling and Recovery, Department of
<input type="checkbox"/> Coachella Valley Mtns. Conservancy	<input type="checkbox"/> S.F. Bay Conservation & Development Comm.
<input type="checkbox"/> Coastal Commission	<input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
<input type="checkbox"/> Colorado River Board	<input type="checkbox"/> San Joaquin River Conservancy
<input type="checkbox"/> Conservation, Department of	<input type="checkbox"/> Santa Monica Mtns. Conservancy
<input type="checkbox"/> Corrections, Department of	<input checked="" type="checkbox"/> State Lands Commission
<input type="checkbox"/> Delta Protection Commission	<input type="checkbox"/> SWRCB: Clean Water Grants
<input type="checkbox"/> Education, Department of	<input type="checkbox"/> SWRCB: Water Quality
<input type="checkbox"/> Energy Commission	<input type="checkbox"/> SWRCB: Water Rights
<input checked="" type="checkbox"/> Fish & Game Region # <u>3</u>	<input type="checkbox"/> Tahoe Regional Planning Agency
<input type="checkbox"/> Food & Agriculture, Department of	<input type="checkbox"/> Toxic Substances Control, Department of
<input type="checkbox"/> Forestry and Fire Protection, Department of	<input type="checkbox"/> Water Resources, Department of
<input type="checkbox"/> General Services, Department of	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Health Services, Department of	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Housing & Community Development	
<input type="checkbox"/> Native American Heritage Commission	

Local Public Review Period (to be filled in by lead agency)

Starting Date August 22, 2024 Ending Date September 21, 2024

Lead Agency (Complete if applicable):

Consulting Firm: <u>GAIA Consulting, Inc.</u>	Applicant: <u>Cargill, Incorporated</u>
Address: <u>461 Oak Vista Drive</u>	Address: <u>7220 Central Ave</u>
City/State/Zip: <u>Santa Rosa, CA 95409</u>	City/State/Zip: <u>Newark, CA 94560</u>
Contact: <u>Susanne von Rosenberg</u>	Phone: <u>(952) 742-6780</u>
Phone: <u>(510) 774-9085</u>	

Signature of Lead Agency Representative: _____ Date: _____

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

Table 1. Project Areas, Assessor’s Parcel Numbers and Associated Ponds

Project Area Component	Assessor’s Parcel Number (APN)	Applicable Pond(s)/Areas ^[1]
Baumberg Pond B-3C	482-80-2-26	B-3C
Newark Plant 1	537-551-5-1	1, PP1
	537-551-6-6	PP1
	537-601-3-3	1
	537-601-3-8	2, 3
	537-601-15-9	4, 6, 9, 4B, 8
	537-601-16-2	4
	543-370-1-8	4, 5, 6, 7, 8, 1A, 2A, 3A, 4A
Newark Plant 2	537-751-10	Cx20, Cx21
	537-751-11	Cx22, Cx23
	537-751-1-1	PP8, Cx18, Cx19, Cx25, Cx1, Cx2, Cx3, Cx4, Cx5, Cx6, Cx7, Cx8, Cx9, Cx11, Cx12, Cx13, Cx15, Cx16, Cx27, Cx28, Cx10a, Cx26, DSP11, DSP10
	537-551-33-2	Cx13, Cx16, DSP10
	537-701-2-10	Cx26, PP8, DSP10, DSP11
	537-801-1-9	PP8, PP7
	537-751-14	Cx27
	537-751-15-2	Cx27, Cx28
	537-751-13	Cx27
	537-751-12-3	Cx24, Cx25, Cx27
	537-701-2-14	1, 2, 3
	537-701-1-1	1
	537-801-1-6	3, 6
		537-801-4-5
537-852-12		FMC Ponds
537-852-14		FMC Ponds
537-852-15		FMC Ponds
537-852-16		FMC Ponds
537-852-17		FMC Ponds
537-852-18		FMC Ponds
Redwood City Plant	054-131-080	Flood Slough
	055-400-590	Belle Haven Pump Area
	054-300-230	Cx1-4
	054-300-670	Pond 10
	054-310-060	7C

Project Area Component	Assessor's Parcel Number (APN)	Applicable Pond(s)/Areas ^[1]
	054-310-100	9A
	054-310-120	9
	054-310-140	9A
	054-310-160	Cx 1-9, 7A, 7B, 7C, 8W, 8E, 9, 9A, 10
	055-400-230	9
	054-400-510	Flood Slough
	054-400-520	Flood Slough
Cargill West Bay Areas	055-400-630	Redwood City Maintenance Pond (former SF-2 Donut), Brine Pipeline

^[1] Pond numbers with a "Cx" prefix refer to crystallizers.

Table 2. General Plan Designations for the Project Area Components

Project Area Component	General Plan Designation of Project Area	General Plan Designation(s) of Adjacent Areas	Zoning
Baumberg Pond B-3C	City of Hayward: Flood Plain	All: City of Hayward: Flood Plain	Hayward: Flood Plain
Newark Plant 1	City of Fremont: OS (Open Space); City of Newark: Resource Production - Salt Harvesting and Refining (allows man-made crystallizer beds used for salt crystallization, and related buildings, facilities, and operations for salt harvesting, stacking, sizing, packaging, and/or distribution)	East: City of Fremont: OS (Open Space), P (Planned District) South: None West: None North: City of Hayward: Flood Plain	Fremont: RCP (Resource Conservation/Public) Newark: OC-A (Conservation-Open Space/Salt Harvesting, Refining, and Production)
Newark Plant 2	City of Fremont: OS (Open Space); City of Newark: Resource Production - Salt Harvesting and Refining (allows man-made crystallizer beds used for salt crystallization, and related buildings, facilities, and operations for salt harvesting, stacking, sizing, packaging, and/or distribution)	East: City of Fremont: OS (Open Space), RR (Railroad Corridor); City of Newark: High Density Residential, Low-Medium Density Residential, Conservation - Parks and Recreational Facilities, General Industrial, Open Space, Low-Density Residential South: City of Fremont: OS (Open Space) West: None North: None	Fremont: RCP (Resource Conservation/Public) Newark: OC-A (Conservation-Open Space/Salt Harvesting, Refining, and Production)

Project Area Component	General Plan Designation of Project Area	General Plan Designation(s) of Adjacent Areas	Zoning
Redwood City Plant	City of Redwood City: Western portion: UR (Urban Reserve) Eastern portion: OS (Open Space - Preservation)	East: City of Redwood City: OS (Open Space - Preservation); City of Menlo Park areas: Parks and Recreation, Baylands South: City of Redwood City: MDR (Residential - Medium Density), LI (Industrial - Light); City of Menlo Park areas: Light Industrial, Office, Residential West: City of Redwood City: IP (Industrial - Port-Related), O (Commercial Office - Professional/Technology), M (Marina) North: City of Redwood City: O (Commercial Office - Professional/Technology), M (Marina), OS (Open Space - Preservation)	Redwood City: TP (Tidal Plain)
Cargill West Bay Areas	City of Menlo Park: Baylands	East: City of Menlo Park: Baylands South: City of Menlo Park: Light Industrial, Office West: City of Menlo Park: Baylands North: City of Menlo Park: Baylands	Menlo Park: Flood Plain
Transbay Pipeline Component of Cargill West Bay Areas	City of Menlo Park: Baylands	East: City of Menlo Park: Baylands South: City of Menlo Park: Baylands West: City of Menlo Park: Baylands North: City of Menlo Park: Baylands	

PROJECT DESCRIPTION

The purpose of the proposed Project is to continue existing maintenance of and operational activities at Cargill's Solar Salt Systems in Newark/Fremont and Redwood City in a safe and environmentally protective manner over the next 10 years. The specific Project objectives include to: (1) continue conducting various activities necessary to maintain the integrity and stability of earthen berms, water control structures, and other infrastructure to ensure continued viability of salt production activities; (2) allow for implementation of preliminary sea level rise (SLR) adaptation efforts, including adaptation studies; and (3) permit Cargill to develop and implement new maintenance methods that may further reduce the potential effects of maintenance activities on the environment, improve efficiency, and/or adapt to changing climate conditions, where appropriate, while ensuring any new maintenance methods will still result in less-than-significant impacts on the environment.

The salt-making process today, the movement of increasingly saline brine between ponds, and the crystallization of salt in preparation for harvest, is essentially the same as what has occurred historically for at least the last 100 years. The salt-making process itself would not be regulated under the new proposed maintenance and operations permit, but these activities are discussed in the EA as part of the existing environmental and baseline conditions.

Maintenance activities, if approved by BCDC, would be conducted under a new BCDC permit and would be similar in nature and extent to the maintenance and operations activities currently carried out under existing BCDC Permit No. 1993.004.19 (i.e., largely a continuation of current activities) except for implementation of limited new maintenance methods as previously discussed. Maintenance activities that are currently performed regularly under the existing BCDC Permit include:

- Maintenance of salt pond berms, various salt-making equipment, and pipes and ditches used to move brine;
- Minor excavation to provide access to repair and replace berms and other facilities, including use of locks;
- Making salt pond berms drivable,
- Removal of sediment at Bay water intakes,
- Import of clean soil and concrete, and
- Minor modifications to internal berms including re-establishing vehicle access on some internal berms by replacing existing gaps with culverts and bridges

The proposed Project includes both existing activities that will continue to be performed and limited changes in the level of existing activities, as summarized below:

- Reducing berm keying from approximately four miles over a 10-year period to two miles over a 10-year period.
- Increasing lock access from approximately one event per year to up to two events per year.
- Increasing the amount of berm maintenance. As more berms are made drivable, the average amount of maintenance is anticipated to increase by an annual average of 17%

over the proposed 10-year Project term and the need to access and egress locks would decrease.

- Increasing the number of structure repairs from approximately one major repair per year to a total of up to 12 major and minor repairs per year.
- Increasing the combined total of clean soil and concrete imported for berm maintenance and riprap repair by approximately 10%.
- Focusing a portion of the berm maintenance effort on Ponds P2-12 and P2-13 in Newark Plant to ensure that the height of the berms surrounding these ponds is increased to a minimum elevation of 11.5 feet NAVD88 by the end of the permit period (2034).

(Note further that while some proposals involve an increase in activity over the actual, existing operations, Cargill's existing permit authorizes a comparatively larger scope of activities. In other words, with respect to certain maintenance activities Cargill is not necessarily undertaking the full extent of activities permissible under its existing permit.)

The proposed Project includes new berm maintenance activities related to sea level rise adaptation as well as new protections for special status fish at Cargill's Bay intakes. These activities would be:

- Installing fish screens on one or more of the three pumps comprising Cargill's main (Coyote) Bay water intakes near the mouth of Alameda Creek.
- Preparing a Monitoring and Adaptive Management Plan to evaluate the potential for sensitive fish species to be present at Cargill's other Bay water intakes, and to define and prioritize any additional fish protection measures that may be required. (Note that additional, separate CEQA review would occur for any additional fish protection measures that may be implemented pursuant to the Monitoring and Adaptive Management Plan.)
- Conducting a study of using vinyl sheet pile for possible sea level rise adaptation efforts and enhanced berm integrity. The work would consist of installing approximately 500 to 600 linear feet of vinyl sheet
- Cargill may also modify its maintenance methods and implement methods that reduce the potential for impacts to the environment, increase efficiency, and/or address effects of climate change so long as the modifications do not raise the possibility of causing any significant environmental impacts beyond those raised by existing approved maintenance methods. Alternative or new methods proposed would be approved as part of an annual Work Plan process proposed to be included as a condition of approval of the BCDC permit (and that is already being implemented as part of the existing permit).

New protections for special status fish are required because fish passage has been reestablished in Alameda Creek with the intention of reestablishing a Central California Coast steelhead run in the Creek, and because longfin smelt have been confirmed to be present in the South Bay.

Specific maintenance activities and the extent of maintenance activities needed would vary year to year, are influenced by annual weather patterns, among other factors, and would be approved on a year-to-year basis through an annual Work Plan encompassing work allowed under the permit. This process is implemented currently as part of the existing BCDC Permit and is also proposed as a component of the proposed Project. Therefore, the EA would address the total estimated upcoming maintenance work for the next 10 years averaged over the proposed 10-year permit period.

Cargill has implemented and would continue to implement a wide range of best management practices (BMPs) to avoid or minimize potential impacts to the environment, including sensitive species, marsh habitat, and water quality. These BMPs include specific procedures for certain activities, such as lock access and weed management, as well as employee training and proper timing of maintenance activities. The EA includes 60 BMPs that would be implemented as part of the proposed Project. The BMPs address berm maintenance, endangered species and sensitive natural resources, lock access/egress, rip-rap placement, and weed management.