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Sent: Friday, May 17, 2024 1:34 PM

To: I-15ReplaceRSP@DOT <I-15ReplaceRSP@dot.ca.gov>

Cc: OLRA@DOC <OLRA@conservation.ca.gov>; OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>

Subject: Interstate 15 Replace RSP for 6 Bridges - SCH No. 2024040752

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Dear Malisa Lieng,

The California Geological Survey (CGS) has received the Initial Study with Proposed Mitigated Negative Declaration (IS/MND) for the SBD I-15 Replace Rock Slope Protection (RSP) for 6 Bridges Project. This email conveys the following recommendations from CGS concerning geologic issues related to the project area:

1. Expansive Soils

In the Geology and Soils Section 2.7, the IS/MND states that the “San Bernardino County Land Use Plan General Plan Geologic Hazard Overlay Map does not ... identify any land within the project limits as susceptible to landslides or liquefaction, *which implies the absence of expansive soil* [emphasis mine].” This is incorrect. The lack of liquefaction or landslide hazard does *not* imply that expansive soils are not present. Liquefiable and expansive soils are not interchangeable. Indeed, in general, expansive soils tend to be clay rich, and clay-rich soils tend not to be liquefiable. Similarly, liquefiable soils tend to be granular and not expansive. Therefore, the IS/MND has not adequately addressed the potential impact of expansive soils on the project. The IS/MND should directly address this potential impact by determining independently if expansive soils exist at the project site and then determining if they could have an impact. It cannot use the lack of liquefaction or landslide hazard as a proxy for the lack of expansive soils.

If you have any additional comments or questions, please feel free to call or email.

Thank you,
Judy Zachariasen

Judith Zachariasen, PhD, PG, CEG



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