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July 2, 2021

Charles S. Krolikowski
Charles.Krolikowski@ndlf.com

VIA E-MAIL

Camille Leung
Project Planner
County of San Mateo Planning & Building
Dept.
400 County Center
Redwood City, CA 94063
cleung@smcgov.org

Re: *Additional Objections to the Proposed Minor Modification and Addendum to the FEIR for Highlands Estates Subdivision Project*

Dear Ms. Leung:

This office represents Save Our Highlands, an association of concerned residents in the Highlands area (collectively, "Claimants"). This letter supplements our May 17, 2021 and June 17, 2021 letters to you with additional objections to the County of San Mateo's ("County") proposed "minor modification" to the Chamberlain Highlands residential development project (the "Project") and proposed addendum ("Addendum") to the Project's Final Environmental Impact Report ("FEIR"). Specifically, our understanding is that the County is considering a proposed modification ("Modification") to the resource management permit (PLN2006-00357) for the development of Lots 5, 6, 7 and 8 of the Project. Please accept this correspondence as comments and objections from Claimants regarding the Modification and Addendum and include it in the record relating to the Project, the Modification and the Addendum.

1. **Incorporation of Previous Comments and Objections.**

Please consider Claimants' May 17, 2021 objection letter and June 17, 2021 objection letter (and attachments thereto) sent to you via e-mail to be incorporated herein in their entirety.

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2. **Analysis by Claimants' Geotechnical Consultant Demonstrates that the Mitigation Measures Have Not Been Satisfied, the Modification is Improper and the Addendum Is Inadequate.**

Claimants retained a geotechnical consultant, Glenn Tofani of GeoKinetics, Inc., to review the documents related to the proposed Modification and Addendum. Mr. Tofani provided his initial analysis in a report that was attached as Exhibit 1 to the letter we submitted to you via e-mail on June 17, 2021. Mr. Tofani has now provided an additional analysis in a report that is attached as **Exhibit A** to this letter and is incorporated herein in full. Please note that this report supplements rather than replaces Mr. Tofani's previous report. The report identifies multiple issues with the Modification and Addendum, several of which are summarized below.

(a) **Mitigation Measures Requiring a Site-Specific Design-Level Geotechnical Investigation Prior to the Approval of the Proposed Building Construction Have Not Been Satisfied.**

The FEIR contains a mitigation monitoring and reporting program that includes several mitigation measures related to geology and soils. (See FEIR, at 4.0-8 to 4.0-12.) As noted in Mr. Tofani's report, one of these mitigation measures calls for a site-specific design-level geotechnical investigation prior to the approval of the construction and issuance of a grading permit. (See FEIR, at 4.0-8[1] & 4.0-9[2].) That geotechnical investigation is specifically required for "[a]ll lots." (FEIR, at 4.0-9.) However, the documents that have been made available to the public do not show that such a site-specific design-level geotechnical investigation has been performed on Lots 5 through 8. Rather, it appears that the only geotechnical analysis that has been performed is a review of the previous investigation performed in June 2009, which is before the Draft EIR was circulated. While the Cornerstone 2015 report states that a single boring was drilled on July 28, 2015, the boring was performed on Lot 11. No subsurface exploration was performed on Lots 5 through 8. Mr. Tofani states the following in his report:

> As shown in Figure 14, Lot 11 is located approximately 350 feet to the northeast of Lots 5 through 8. ***The additional subsurface data collected at Lot 11 would not provide insight into the subsurface conditions at Lots 5 through 8.*** It is significant to note that no additional subsurface

[1] "A design-level geotechnical investigation of the site shall be performed prior to any project grading including static and seismic slope stability analysis of the areas of the project site to be graded and developed." (FEIR, at 4.0-8.)

[2] "A site-specific, design-level geotechnical investigation shall be completed during the design phase of the proposed project, and prior to approval of new building, construction within the site for specific foundation design, slope configuration, and drainage design. ***(All lots)***" (FEIR, at 4.0-9, emphasis added.)

> exploration was performed at Lots 5 through 8 in conjunction with this investigation.

(**Exh. A**, at p. 3, emphasis added.) The failure to perform the further required geotechnical investigation violates Mitigation Measure GEO-1 and Mitigation Measure GEO-2b. The County's failure to enforce the mitigation measures for the Project deeply concerns Claimants.

(b) **The Approval of a "Minor Modification" Is Improper.**

Condition of Approval No. 1 for the Project states:

> This approval applies only to the proposal, documents and plans described in this report and submitted to and approved by the Board of Supervisors on April 27, 2010. ***Minor revisions or modifications*** to these projects in compliance with Condition No. 5 may be made subject to the review and approval of the Community Development Director. ***Revisions or modifications not in compliance with Condition No. 5 shall be deemed a major modification and shall be subject to review and approval by the Planning Commission at a public hearing***.

Condition of Approval No. 5 for the Project states:

> This project will be implemented as proposed, mitigated, conditioned, and approved by the Board of Supervisors, ***regarding parcel size and configuration, home sizes, home locations, architectural design, style and color, materials, height and foundation design***. Prior to the issuance of a Certificate of Occupancy for any residence, the applicant shall provide photographs to the Current Planning Section staff to demonstrate utilization of the approved colors and materials. Materials and colors shall not be highly reflective.

Mr. Tofani's report notes: "The substantial increase in the proposed export quantity that has occurred since the Final EIR was issued (i.e. from 4,000 cubic yards to 7,790 cubic yards) suggests the excavation depths and/or limits for the proposed landslide mitigation activities have increased significantly since the Draft and Final EIRs were prepared." The Addendum establishes a 65 percent increase in cut-and-fill volumes and almost four times the number of one-way construction truck trips from

what was anticipated at the Project approval.[3] It seems fairly obvious that a Project modification for which the County felt the need to prepare a 289 page CEQA Addendum and impose new mitigation requirements does not meet the usual definition of a ***minor*** modification. There is nothing that suggests all changes that do not fall into the categories specified under Condition of Approval No. 5 are automatically minor modifications and subject only to the approval of the Planning Director. Mr. Tofani's report reinforces that this proposed modification should be treated instead as a major modification and, accordingly, be subject to review and approval by the Planning Commission at a public hearing pursuant to Condition of Approval No. 1.

(c) **At a Minimum, a Supplement to the EIR Is Required rather than an Addendum.**

The Addendum states that "the circumstances and assumptions under which the project's earthwork program and construction schedule were previously developed have changed since certification of the Final EIR." (Addendum, at p. 1-2.) Yet, the County asserts that an addendum to the Final EIR is appropriate here because "these changed circumstances and associated proposed changes do not require ***major revisions*** to the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects." (*Ibid.*, emphasis added.) The County ignores that the lack of the need for "major revisions" to the EIR does not mean an addendum is the appropriate form of CEQA review. At a minimum, Section 15163 of the CEQA Guidelines requires the County to prepare a supplement to the EIR -- rather than an addendum -- because the record demonstrates substantial changes in circumstances, as well as significant new information, which require a major re-write of the temporary impacts analysis of the FEIR, among other sections.

In his report, Mr. Tofani notes:

> The substantial increase in the proposed export quantity that has occurred since the Final EIR was issued (i.e. from 4,000 cubic yards to 7,790 cubic yards) suggests the excavation depths and/or limits for the proposed landslide mitigation activities have increased significantly since the Draft and Final EIRs were prepared. Deeper and/or larger excavations are likely to result in higher risks of triggering slope failures or landslides beyond the limits of the existing failures. These risks should be evaluated and compared to those associated with the original project in order to quantify the level of increased risk and identify potential impacts along with supplemental mitigative measures that may be required.

[3] The air quality chapter for the Project EIR estimated and analyzed 167 construction truck trips (334 one-way trips) for the transport of imported fill (2,000 cy).

Mr. Tofani's report further demonstrates that these Project revisions are significant enough and carry a level of risk that should require the preparation of a supplement to the EIR rather than a simple addendum.

(d) **The Analysis in the Addendum Is Insufficient.**

As noted above, the County appears to have failed to perform the site-specific design-level geotechnical investigation required prior to grading under Mitigation Measure GEO-1 and Mitigation Measure GEO-2b. The absence of this required investigation would necessarily cause the analysis of geology and soils in the Addendum to be inadequate even if the plans were not calling for a significant increase in the proposed export quantity, amount of truck trips and other substantial proposed changes. Even if the County were to argue, incorrectly, that the further geotechnical investigation of Lots 5 through 8 required by the mitigation measures is not necessary because the test pits performed in 2009 sufficiently mapped the two previously-identified landslides, that would ignore the potential additional risks of triggering slope failures or landslides beyond the limits of the previously-identified failures due to the substantial increase in the scope of the grading on those lots. Here, the failure to perform the investigation required by the mitigation measures, and the failure to perform the investigation necessary to quantify the risks associated with the significantly increased scope of the grading activities, cannot be overlooked.

3. **Claimants Have the Right to Appeal any Decision Regarding the Modification and Addendum to the Planning Commission and the Board of Supervisors.**

In prior correspondence with our office regarding the Project, the County has asserted that "in cases in which the Planning Director determines that a minor modification of a project is warranted, neither the County Zoning Regulations nor any other controlling authority provides for an administrative appeal of such a determination and an administrative appeal is not a proper route for challenging the Planning Director's determination that a project modification is minor, as opposed to major." The County's need to invoke CEQA through the addendum process establishes that the "minor modification" process is fully discretionary. (Pub. Resources Code, § 21080, subd. (b)(1); see also CEQA Guidelines, § 15268, subd. (a) ["Ministerial projects are exempt from the requirements of CEQA."].) To the extent that the Planning Director approves the Modification and Addendum, please note that Claimants must be given the opportunity to appeal that decision to the Planning Commission and the Board of Supervisors. Section 6104 of the County of San Mateo Zoning Code requires such an opportunity for appeal when the Planning Director takes on the role of "Zoning Administrator," as he is here.

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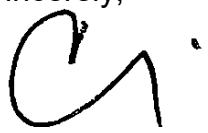
4. **Request for Notice.**

Again, please note that Claimants expressly request that the County provide this office with notice via e-mail of any decision the County makes regarding the Modification or the Addendum. This includes, without limitation, notice of the certification of the Addendum and/or notice of the filing and/or recording of any CEQA-related notice of determination regarding the Project. Notices should be sent to charles.krolikowski@ndlf.com and jack.rubin@ndlf.com.

Claimants reserve the right to supplement these comments at any later hearings and proceedings related to this Project. (Gov. Code, § 65009, subd. (b); Pub. Resources Code, § 21177, subd. (a); *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1199–1203.)

If you have any questions or comments concerning the above, do not hesitate to contact me.

Sincerely,



Charles S. Krolikowski

cc: Steve Monowitz - Community Development Director - San Mateo County Planning and Building Department
Clients

Enclosure: Exh. A -- Assessment of EIR Addendum for Highland Estates Subdivision Project San Mateo, California by GeoKinetics, Inc., dated 7/2/2021

4836.101 / 9397921.1

EXHIBIT A

TO ADDITIONAL OBJECTIONS TO THE PROPOSED MINOR MODIFICATION AND ADDENDUM TO THE FEIR FOR HIGHLANDS ESTATES SUBDIVISION PROJECT

GeoKinetics
Geotechnical &
Environmental Engineers

77 Bunsen
Irvine, CA 92618

Tel 949.502.5353, Fax 949.502.5354
e-mail: info@geokinetics.org

July 2, 2021

Mr. Jack Rubin, Esq.
Newmeyer & Dillion
895 Dove Street, 5th Floor
Newport Beach, California

SUBJECT: ASSESSMENT OF EIR ADDENDUM FOR HIGHLAND ESTATES SUBDIVISION PROJECT - SAN MATEO, CALIFORNIA

Dear Mr. Rubin:

As requested, we have evaluated the recent addendum to the Final Environmental Impact Report (EIR) for the above referenced project (Ref. 18). This evaluation has included a detailed review of the Draft and Final EIRs (Refs. 8 & 9) and associated documents - along with the research, retrieval, and review of historic aerial photographs of the Lot 5 to 8 Ticonderoga Drive landslide area. Copies of these photographs are provided as Figures 1 through 13. As shown on these photographs, a landslide has been identified extending across the subject lots. The scope of the grading activities that are proposed to mitigate the landslide and develop the four lots has changed significantly since the time the EIR was prepared. The development chronology and associated changes to the project are summarized below:

1980: Berloger & Associates performed a geotechnical investigation at the site that involved the excavation of five test pits in the landslide area. The two landslides were not identified in conjunction with this investigation.

2006: TRC Lowney performed an investigation at the site that involved the excavation of three borings in the vicinity of the landslides along with geologic mapping. The landslide was identified during this investigation and its limits were mapped.

Oct 2008: Treadwell & Rollo prepared and provided a Geologic Evaluation Environmental Impact Report to Impact Sciences and the County. The report provided a summary of prior investigations and summarized the geologic conditions and hazards that had been identified at the site. Treadwell & Rollo had proposed additional subsurface exploration as part of its

assessment (12 borings up to 50 feet deep and 4 test pits up to 40 feet deep), however the County suggested that sufficient information existed for the EIR analysis and the proposed subsurface exploration activities were removed.

Feb 2009: Cotton Shires & Associates (CSA) performed a geotechnical and geologic review of the proposed Highland Estates project on behalf of the Highland Estates Community Association. CSA noted that adequate characterization of the length, width, and depth of the existing landslide had not been completed. As of that point in time, no borings or test pits had been excavated within the landslide limits that identified the presence, depth, or configuration of the failure surface(s).

March 2009 County, Impact Sciences, Cornerstone, Treadwell & Rollo, and CSA representatives meet and agree that additional subsurface investigation of the landslides mapped at Lots 5 through 8 was warranted. Treadwell & Rollo subsequently prepared a proposal that included the excavation of three hand-dug test pits to depths between 10 and 35 feet.

June 2009: Treadwell & Rollo excavated three test pits within the mapped limits of the landslide and logged the depth and configuration of the failure surface within those excavations as set forth in their April 14, 2009 proposal (Ref. 5). The failure surface is identified at depths ranging from approximately 4 to 25 feet within the test pits.

Sept 2009: A Draft EIR for the Highland Estates project is prepared for the County of San Mateo and circulated for review and comment. The Draft EIR indicated the grading activities associated with the development of Lots 5 through 8 would include a total of 1,000 cubic yards of cut and 1,000 cubic yards of fill. As such, no net import or export of soil was indicated that would otherwise require truck trips to haul that material.

Dec 2009: The Final EIR for the Highland Estates project is submitted to the County of San Mateo. The Final EIR indicates the grading activities associated with the development of Lots 5 to 8 will include a total of 4,700 cubic yards of cut and 700 cubic yards of fill. These quantities indicate 4,000 cubic yards of excavated soil would need to be exported from the Lot 4 to 8 area. A typical haul track can carry 12 cubic yards of material. As such, the removal of 4,000 cubic yards of material would require approximately 333 round trip truck trips.

April 2010: The Final EIR is approved and certified by the County. Both the Draft and Final EIRs contained provisions for mitigating the potential geologic impacts associated with the project. These included the requirement to complete a "site-specific, design-level geotechnical investigation" prior to the approval of the proposed building construction.

Oct 2015: Cornerstone Earth Group issues a report on an Updated Geotechnical Investigation for Highland Estate Lots 5 through 11. The purpose of this investigation was presumably to provide compliance with the requirements of the EIR and provide geotechnical parameters for the development of the lots. As shown in Figure 14, Lot 11 is located approximately 350 feet to the northeast of Lots 5 through 8. The additional subsurface data collected at Lot 11 would not provide insight into the subsurface conditions at Lots 5 through 8. It is significant to note that no additional subsurface exploration was performed at Lots 5 through 8 in conjunction with this investigation.

Sept 2018: Improvement plans for Lots 5 to 8 are prepared by BKF Engineers. These plans indicate a total of 8,020 cubic yards of cut for the four lots along with a total of 130 cubic yards of fill. Accounting for cut material that will be replaced as fill, these plans appear to indicate a total planned export of 4,680 cubic yards of soil. The export of this volume of material would require approximately 390 truck trips.

May 2021: The previously referenced Final EIR Addendum is submitted to the County. This document appears to indicate the Lot 5 to 8 grading will involve a total of 8,110 cubic yards of cut and 320 cubic yards of fill with the net export of 7,790 cubic yards of soil. The Addendum notes that approximately 650 truck trips would be required.

As noted above, the original Draft EIR indicated no truck trips would be required for the export of soil during the development of Lots 5 through 8. In the final EIR, that had changed to approximately 333 truck trips. In the most recent EIR Addendum, the number has been increased to an estimated 650 truck trips. This represents a substantial change relative to the approved project.

As noted above, the Final EIR required the completion of a "site-specific, design-level geotechnical investigation" prior to the approval of the proposed building construction. However, no additional subsurface investigation was performed with respect to the development at Lots 5 through 8 since the Draft and Final EIRs were prepared. This raises the following two questions:

- Has there been compliance with the mitigation requirements set forth in the EIR?

- Why has the export quantity changed so significantly since the issuance of the Draft and Final EIRs with no additional subsurface exploration having been performed on the lots?

The substantial increase in the proposed export quantity that has occurred since the Final EIR was issued (i.e. from 4,000 cubic yards to 7,790 cubic yards) suggests the excavation depths and/or limits for the proposed landslide mitigation activities have increased significantly since the Draft and Final EIRs were prepared. Deeper and/or larger excavations are likely to result in higher risks of triggering slope failures or landslides beyond the limits of the existing failures. These risks should be evaluated and compared to those associated with the original project in order to quantify the level of increased risk and identify potential impacts along with supplemental mitigative measures that may be required.

We hope this information is helpful to you. Please do not hesitate to contact with of the undersigned if you have any questions or comments.

Sincerely,
GEOKINETICS, INC.

Glenn D. Tofani, GE/RCE
Principal Engineer

Bradley E. Dybel, GE/CEG
Project Engineer / Geologist

Attachments

References

1. Test pit logs for TP-1 through TP-49 by Berloger & Associates dated 1980.

2. Boring logs for EB-1 through EB-3 by TRC Lowney dated March 2005.

3. *Geologic Evaluation Environmental Impact Report* by Treadwell & Rollo for Impact Sciences dated September 23, 2008.

4. *Supplemental Geologic and Geotechnical Evaluations - Highland Estates Project* by Cotton, Shires & Associates dated February 13, 2009.

5. *Revised Proposal - Supplemental Geologic Investigation* by Treadwell & Rollo for Impact Sciences dated April 14, 2009.

6. Logs for Test Pits TP-1 through TP-3 by Treadwell & Rollo dated August 6, 2009.

7. *Revised Geologic Evaluation Environmental Impact Report* by Treadwell & Rollo for Impact Sciences dated 8-27-08. Note: Actual date of document appears to be 8-27-09.

8. *Highland Estates Recirculated Draft EIR* by Impact Sciences dated September 2009.

9. *Highland Estates Final EIR* by Impact Sciences dated December 2009.

10. County of San Mateo Staff Report dated April 12, 2010.

11. *Updated Geotechnical Investigation - Highland Estates Lots 5 through 11* by Cornerstone Earth Group dated October 30, 2015.

12. *Summary of Estimated Soil / Bedrock Earthwork Quantities Related to Geotechnical Mitigation* by Cornerstone Earth Group dated July 8, 2017.

13. *Improvement Plans for Highland Estates - Lot 5 Ticonderoga Drive* by BKF

Engineers dated September 11, 2018.

14. *Improvement Plans for Highland Estates - Lot 6 Ticonderoga Drive* by BKF Engineers dated September 11, 2018.

15. *Improvement Plans for Highland Estates - Lot 7 Ticonderoga Drive* by BKF Engineers dated September 11, 2018.

16. *Improvement Plans for Highland Estates - Lot 8 Ticonderoga Drive* by BKF Engineers dated September 11, 2018.

17. Memo from BKF to County regarding calculation of grading quantities dated March 7, 2009.

18. *Highland Estates Subdivision Project - Addendum to the Highland Estates Final Environmental Impact Report* dated May 2021 by SWCA Environmental Consultants.

19. *Assessment of EIR Addendum For Highland Estates Subdivision Project - San Mateo, California* for Newmeyer & Dillion by GeoKinetics.

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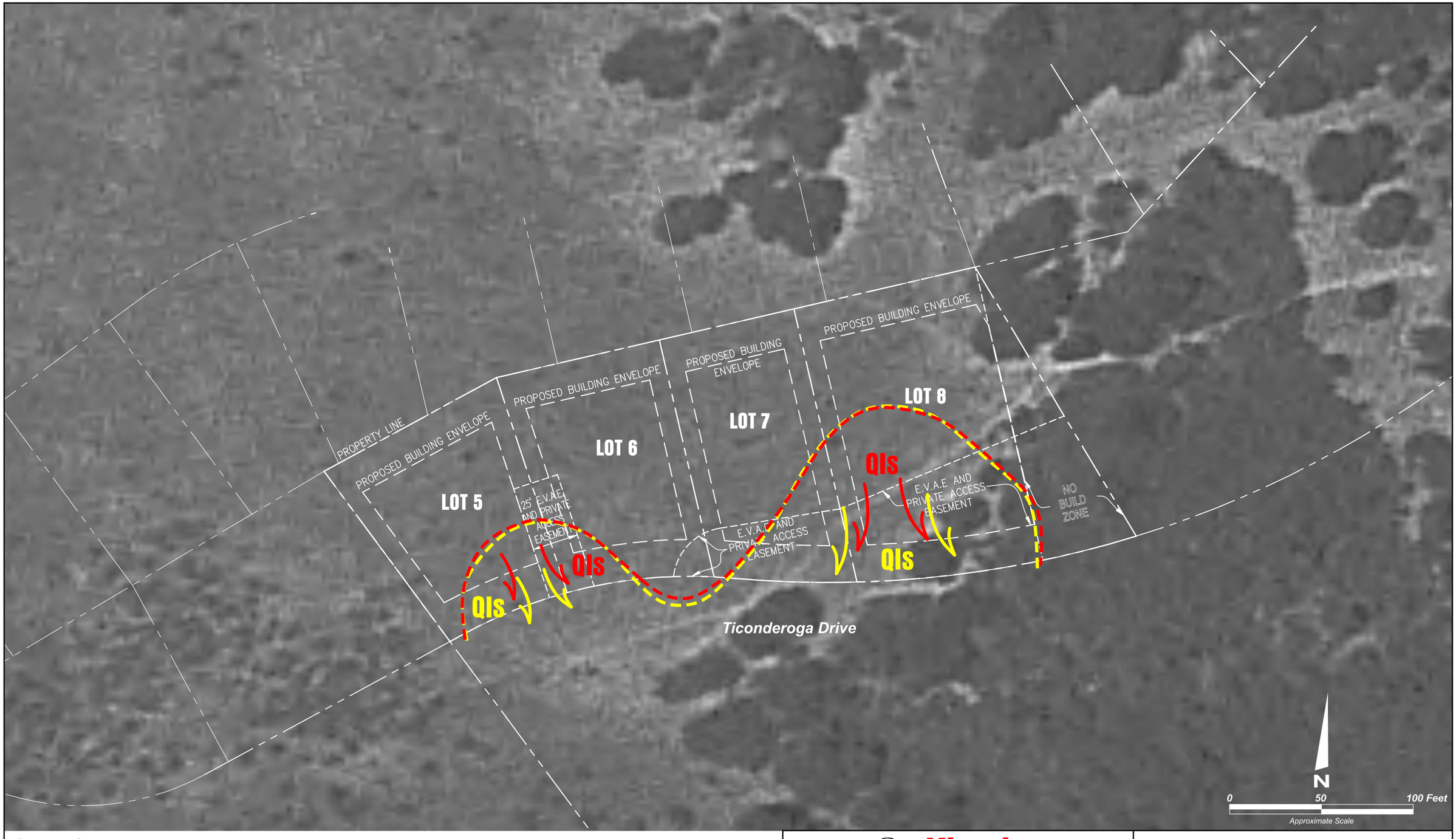


Legend

- Landslide Limits by Cornertsone Earth Group
- Landslide Limits by Treadwell & Rollo
- **Qls** Landslide Deposits

GeoKinetics
Geotechnical & Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

1946 Aerial Photograph of Site With Mapped Landslides

Figure 1

Legend

- Landslide Limits by Cornertsone Earth Group
- Landslide Limits by Treadwell & Rollo
- QIs Landslide Deposits

GeoKinetics
Geotechnical & Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

1956 Aerial Photograph of Site With Mapped Landslides

Figure 2

Legend

Landslide Limits by Cornertsone Earth Group

Landslide Limits by Treadwell & Rollo

Qls Landslide Deposits

GeoKinetics
Geotechnical & Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

1968 Aerial Photograph of Site With Mapped Landslides

Figure 3

Legend

- Landslide Limits by Cornertsone Earth Group
- Landslide Limits by Treadwell & Rollo
- QIs Landslide Deposits

GeoKinetics
Geotechnical & Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

1980 Aerial Photograph of Site With Mapped Landslides

Figure 4

New Brunswick Drive

Cobblehill Place

PROPERTY LINE

PROPOSED BUILDING ENVELOPE

PROPOSED BUILDING ENVELOPE

PROPOSED BUILDING ENVELOPE

PROPOSED BUILDING ENVELOPE

LOT 5

LOT 6

LOT 7

LOT 8

25' E.V.A.E. AND PRIVATE ACCESS EASEMENT

E.V.A.E AND PRIVATE ACCESS EASEMENT

E.V.A.E AND PRIVATE ACCESS EASEMENT

NO BUILD ZONE

Qls

Qls

Qls

Qls

Ticonderoga Drive

N

0 50 100 Feet

Approximate Scale

Legend

Landslide Limits by Cornertsone Earth Group

Landslide Limits by Treadwell & Rollo

Qls Landslide Deposits

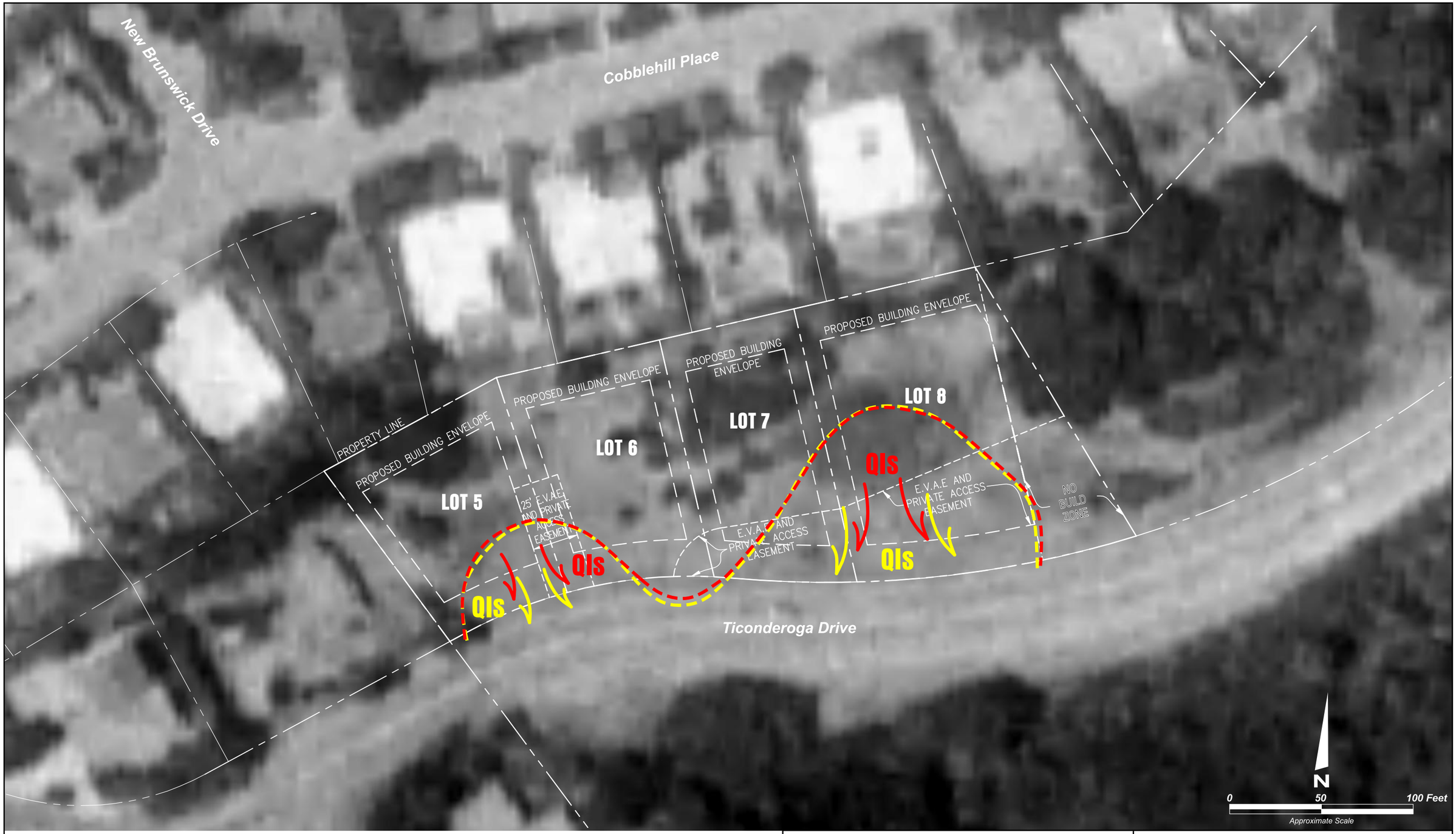
GeoKinetics
Geotechnical &
Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

1987 Aerial Photograph of Site With Mapped Landslides

Figure 5



Legend

Landslide Limits by Cornertsone Earth Group

Landslide Limits by Treadwell & Rollo

QIs Landslide Deposits

GeoKinetics
Geotechnical & Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

1993 Aerial Photograph of Site With Mapped Landslides

Figure 6

Legend

- Landslide Limits by Cornertsone Earth Group
- Landslide Limits by Treadwell & Rollo
- **Qls** Landslide Deposits

GeoKinetics
Geotechnical & Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

2002 Aerial Photograph of Site With Mapped Landslides

Figure 7

Legend

Landslide Limits by Cornertsone Earth Group

Landslide Limits by Treadwell & Rollo

QIs Landslide Deposits

GeoKinetics
Geotechnical & Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

2016 Aerial Photograph of Site With Mapped Landslides

Figure 8

Legend

Landslide Limits by Cornertsone Earth Group

Landslide Limits by Treadwell & Rollo

Qls Landslide Deposits

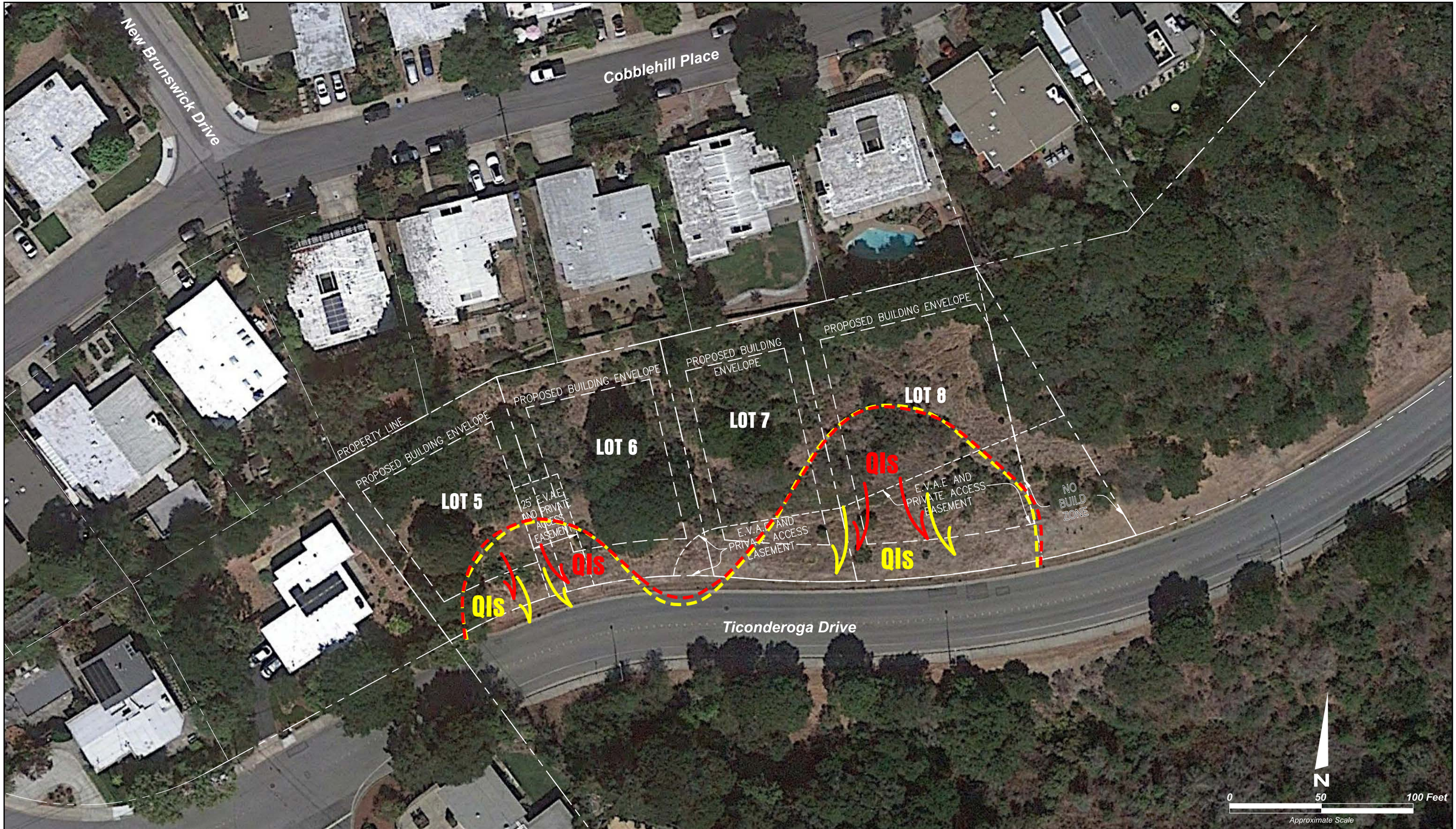
GeoKinetics
Geotechnical & Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

2018 Aerial Photograph of Site With Mapped Landslides

Figure 9



Legend

Landslide Limits by Cornertsone Earth Group

Landslide Limits by Treadwell & Rollo

QIs Landslide Deposits

GeoKinetics
Geotechnical & Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

2020 Aerial Photograph of Site With Mapped Landslides

Figure 10

Legend

Landslide Limits by Cornertsone Earth Group

Landslide Limits by Treadwell & Rollo

Qls Landslide Deposits

GeoKinetics
Geotechnical & Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

Recent 2021 Aerial Photograph of Site With Mapped Landslides

Figure 11

Legend

Landslide Limits by Cornertsone Earth Group

Landslide Limits by Treadwell & Rollo

Qls Landslide Deposits

GeoKinetics
Geotechnical & Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

June 2019 Oblique (North) Aerial Photograph of Site

Figure 12

Legend

Landslide Limits by Cornertsone Earth Group

Landslide Limits by Treadwell & Rollo

QIs Landslide Deposits

GeoKinetics
Geotechnical & Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

June 2019 Oblique (West) Aerial Photograph of Site

Figure 13

Legend

Landslide Limits by Cornertsone Earth Group

Landslide Limits by Treadwell & Rollo

Qls Landslide Deposits

GeoKinetics
Geotechnical & Environmental Engineers

Project Name: Highlands Estate Subdivision

Date: June 2021

Aerial Photograph Illustrating Relative Locations of Lots

Figure 14