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MEMORANDUM

DATE: March 2, 2020
To: Letitia Shen, DTSC
FROM: C. John Dominguez
SUBJECT: Brownell Middle School Modernization Project Addendum

In July 2019, the Gilroy Unified School District (GUSD), as Lead Agency pursuant to the California Environmental Quality Act (CEQA) published the *Proposed Mitigated Negative Declaration* (MND, attached) for the Brownell Middle School Modernization Project. As part of the project evaluated in the July 2019 MND, GUSD proposed to relocate, modernize, and construct buildings within the existing Brownell Middle School footprint located at 7800 Carmel Street in the city of Gilroy, Santa Clara County, California.

As defined in the July 2019 MND, the project site consists of several single-story buildings that will be reconfigured into a new campus for the existing middle school. Replacement buildings will consist of single-story construction for six replacement learning communities (consisting of a 4-building footprint), replacement administration building, replacement Library/Media Center, and a replacement Kitchen addition at the existing Multi-Purpose Building. Modernization and Site improvements will include the existing Multi-Purpose, Gym, PE and athletic facilities, pedestrian hardscape, landscaping, drop-off facilities along the west and east side of the school, and on-site utilities. New construction will entail the addition of a new staff parking lot at the north end with 64 stalls, staff and visitor parking lot at the west end with 25 stalls, school signage, and a new marque sign. Buildings to be demolished include six classroom buildings, 13 portables, the library, food service/kitchen facility, and greenhouse. A total of 37 classrooms will be demolished and replaced; the classroom count and enrollment will remain the same.

The Hazards and Hazardous Materials Section of the July 2019 MND documented that elevated concentrations of arsenic, lead, organochlorine pesticides, and polychlorinated biphenyls (PCBs) were present in the project area soils. The arsenic impacted soil located in the northern portion of the project site was evaluated in the July 2019 MND as part of the

proposed project (see Appendix D of the July 2019 MND [Soil Management Plan for Arsenic Impacted Soil, Padre June 2019]). However, the July 2019 MND identified the need for a second phase of modernization (remediation) for pesticides, lead, and PCBs.

In October 2019, GUSD prepared a Removal Action Workplan (RAW) for the removal and haul away of the excavated 360 cubic yards of soil at the project site (Padre October 2019). Based on the information presented in the RAW, GUSD determined that the proposed changes to the project are minor and none of the conditions described in Sections 15162 and 15164 of the CEQA Guidelines (related to *Subsequent EIRs and Negative Declarations* and *Addendum to an EIR or Negative Declaration*, respectively) will occur that require preparation of a subsequent Negative Declaration in relation to the Brownell Middle School Modernization Project. Therefore, an addendum is appropriate for the project.

The Addendum (attached) addresses the changes to the project related to the second phase of remediation for pesticides, lead, and PCBs. As discussed and evaluated in the Addendum, site cleanup for pesticides, lead, and PCBs and haul away of the potentially hazardous materials would be completed in 20 working days and would require the operation of one grader, two excavators, one tractor/loader/backhoe, one dumper/tender, and one water truck. The Addendum evaluates the site cleanup and haul away of the excavated 360 cubic yards of soil and provides analysis of the resource topics included in the July 2019 MND.

In addition, California Emissions Modeling (CalEEMod, attached) was performed to identify the air emissions generated exclusively as a result of implementing the RAW activities. CalEEMod is used to provide a uniform platform for government agencies, land use planners, and environmental professionals to estimate potential emissions associated with both construction and operational use of land use projects. Based on the model outputs, the proposed Project would result in less-than-significant air quality impacts during construction activities.

The Addendum found that no new or substantially more severe significant impacts would occur as a result of the second phase of remediation, and no additional mitigation measures not previously identified in the July 2019 MND would be required for any resource topics.

It should be noted that the Mitigation Monitoring and Reporting Program (MMRP) for Brownell published with the GUSD July 2019 MND is being replaced with the new mitigation table included as an attachment to this memorandum.

Attachments: