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Subject: Review of Phase I Environmental Site Assessment (ESA) and Project Development Plans, Future Carpenter's Training Center, 18640 Madrone Parkway, Morgan Hill, California

Dear Tracy:

SCS Engineers (SCS) submits this Letter describing our review of documents provided by McMorgan & Company LLC (McMorgan) with respect to the property located at 18640 Madrone Parkway, Morgan Hill, California (the Site). We reviewed the following documents;

AWR Environmental (AWR), 2018a, Lead Soil Sampling Investigation, Madrone Parkway – Assessor's Parcel Number (APN) 726-135-28, Morgan Hill, California, May 10.

AWR, 2018b, Geotechnical & Liquefaction Investigation, "Parcel K" on Madrone Parkway, APN 726-35-028, Morgan Hill, California, August 27.

AWR, 2018c, Phase I Environmental Site Assessment, 18640 Madrone Parkway, Morgan Hill, California, November 1.

RMW Architecture & Interiors (RMW), 2019, Carpenters Training Center, Architectural/Site Plan Review Submittal, 18640 Madrone Parkway, Morgan Hill, California, January 28.

We understand McMorgan wishes to develop the 4.928-acre vacant parcel with a 55,000 square foot, single-story, slab on grade building, surrounding asphalt paved parking, landscaped areas, and access roadways. With the exception of landscaped areas, the entire development will be covered by hardscape (buildings, parking, sidewalks, and/or roadways). The RMW plan set included a grading plan calling for a net export of 3,150 cubic yards of soil.

The Phase I ESA prepared by AWR (2018c) did not identify any recognized environmental conditions (RECs) associated with current or historic Site use. According to AWR, their review of aerial photographs indicated the following historic Site use:

- *1939-1982 (Site Use: Agricultural). The site and surrounding area appears to be used as farmland for row crops. No tanks or other potential environmental concerns were apparent in the aerial photographs, but the scale of the photo limited observations regarding the site features.*

- *1998 (Site Use: Undeveloped Land). The site appears to be graded, undeveloped land. Adjacent roads appear similar to the current configuration. No specific features were apparent on the subject site.*

- *2006-2016 (Site Use: Vacant Land). The site appears to be vacant land with the roadway passing through the site similar to the current configurations. The adjacent roads appear similar to the current configuration. No tanks or other potential environmental concerns were apparent in the aerial photographs, but the scale of the photo limited observations regarding the site features.*

AWR did not report findings or areas of concern resulting in a recommendation for further Site evaluation.

SCS reviewed aerial photographs included in the AWR (2018c) Report to evaluate whether structures or potential agricultural chemical mixing areas may have been present on the Site during prior potential agricultural use. None of the observed photographs appeared to exhibit structures or possible mixing areas.

It is our experience that agricultural activity beginning in the late 1930s may have included use of organochlorine pesticides (OCPs) such as dichlorodiphenyltrichloroethane (DDT), chlordane, and metal-based pesticides, potentially containing copper, lead, and/or arsenic. These classes of pesticides are typically resistant to breakdown and may remain in detectable concentrations in shallow soils for extended periods of time. Trace concentrations of OCPs and metals are likely to be present, even in areas of "routine, legal and permitted" use and application of pesticides; however, it has generally been our experience that unless a pesticide mixing, storage, or disposal area was present, concentrations of OCPs in the subsurface in general agricultural areas tend to be low. As noted above, no such areas were reported by AWR or are known to have existed at the Site. SCS would generally not recommend soil sampling in this situation unless the land would be developed with a sensitive receptor (e.g. school, day care, etc.) at which time there may be a regulatory requirement to sample soil. However, impacts could exist and soil sampling and testing is the only way to confirm what constituents may be present in soils on Site.

Furthermore, following development, the majority of the Site will be covered by hardscape, and/or will be part of landscaped areas which would help reduce the potential for contact with impacted soils if present following development.

If Site soils are to be transported off-Site for disposal or reuse, soil sampling will likely be required and the receiver would provide a list of requested tests based on their requirements.

During Site development, grading and construction activities will follow Division of Occupational Safety and Health (DOSH), better known as Cal/OSHA (OSHA) requirements to ensure worker protective health and safety protocols are followed. This could initiate some form of soils testing and will include procedures to reduce dust to reduce the potential for the release of soils and potential constituents if present via the dust.

CLOSING

We appreciate this opportunity to be of service. Please do not hesitate to contact us with any questions regarding this Letter.

Very truly yours,

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