

Date: August 19, 2019

Project No.: 118-88-1

Prepared For: Ms. Pooja Nagrath  
**DAVID J. POWERS & ASSOCIATES**  
1871 The Alameda, Suite 200  
San Jose, California 95126

Re: Environmental Summary Letter  
Morgan Hill Relief Sewer Trunk Line  
Gilroy, California

Dear Ms. Nagrath:

Per your request, Cornerstone Earth Group (Cornerstone) is pleased to present this letter summarizing our review of selected environmental information pertaining to the planned Morgan Hill Relief Sewer Trunk Line Project (Site). This letter was prepared for David J. Powers & Associates (DJPA) in accordance with our June 23, 2019 Agreement. We understand that DJPA is preparing an Initial Study for the project that satisfies the requirements of the California Environmental Quality Act (CEQA) and the regulations of the City of Morgan Hill. The purpose of this letter is to summarize the environmental setting of the Site and assist DJPA in developing mitigation measures for the project.

## Project Description

To facilitate the City of Morgan Hill's planned growth, a new relief trunk sewer is required to accommodate the associated additional wastewater flows. The project involves constructing approximately 6.6 miles of 36-inch diameter relief trunk sewer pipeline that would extend from the intersection of Harding Avenue and Highland Avenue in San Martin, southeast to the previously constructed City of Gilroy segment of the relief trunk sewer located on Renz Lane in Gilroy.

The pipeline traverses property within the City of Gilroy and unincorporated areas of Santa Clara County. The majority of the new relief trunk sewer will be installed within existing paved road right-of-way via open trench construction while portions of the alignment in areas that intersect with Miller Slough, Union Pacific Railroad (UPRR) tracks, and Caltrans crossings (SR 152 and US 101) will be installed via trenchless construction methods (*i.e.*, microtunneling or horizontal directional drilling). The planned sewer alignment is depicted on Figure 1.

## Scope of Work

As presented in our Agreement, the scope of work performed for this study included the following:

- Acquisition and review of a regulatory agency database report of public records for the general area of the Site to evaluate potential impacts to the Site from reported contamination incidents at nearby facilities.

- Review of readily available aerial photographs to help evaluate past and current Site uses.
- Preparation of a written letter summarizing our findings and recommendations.

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## Site History

To evaluate the history of the Site and immediate Site vicinity, we reviewed historical aerial photographs dated between 1954 and 2014 obtained from Environmental Data Resources (EDR) of Shelton, Connecticut; copies of aerial photographs reviewed are presented in Appendix A.

Based on our review of the historical aerial photographs, during the 1950s, the general Site vicinity consisted mainly of agricultural land (orchards and row crops) with widely spaced residences. A greater density of development (mainly residences) is apparent near the City of Gilroy along the southern portion of the planned sewer alignment. Between the 1950s and the present, a gradual increase in both commercial and residential development is apparent along the planned sewer alignment.

Portions of the planned sewer alignment traverse properties that were occupied by orchards or row crops prior to construction of the existing roadways. Most other portions of the alignment follow roadways that were historically bordered by orchards or row crops.

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## Regulatory Agency Database Review

Cornerstone conducted a review of federal, state and local regulatory agency databases provided by EDR to evaluate the likelihood of contamination incidents at and near the Site. The database sources and the search distances are in general accordance with the requirements of ASTM E 1527-13. A list of the database sources reviewed, a description of the sources, and a radius map showing the location of reported facilities relative to the project Site are attached in Appendix A.

Based on the information presented in the agency database report and a cursory review of reports obtained from the Geotracker and Envirostor databases<sup>1</sup>, no nearby spill incidents were reported that appear likely to significantly impact soil or ground water beneath the Site. The potential for impact was based on our interpretation of the types of incidents, the locations of the reported incidents in relation to the Site and the assumed ground water flow direction and depth.

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<sup>1</sup> Geotracker (<http://geotracker.waterboards.ca.gov>) is a database and geographic information system (GIS) that provides online access to environmental data. It tracks regulatory data about leaking underground storage tank (LUST), Department of Defense, Site Cleanup Program and Landfill sites. The Envirostor database (<http://www.envirostor.dtsc.ca.gov>) is maintained by the Department of Toxic Substances Control (DTSC) and contains information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted or have been completed under DTSC's oversight. The Envirostor database includes the following site types: Federal Superfund sites; State Response sites; Voluntary Cleanup sites; and School sites.

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## Conclusions and Recommendations

Based on the above summary, Cornerstone concludes and recommends the following:

- Portions of the planned sewer alignment were previously used for agricultural purposes (prior to construction of the existing roadways) and most of the remaining portions of the alignment follow roadways that have historically been bordered by agricultural properties. Pesticides may have been applied to crops in the normal course of farming operations. Residual concentrations of agricultural chemicals may remain in on-Site soil, such as organochlorine pesticides and pesticide-related metals (*i.e.*, arsenic, lead and mercury).
- The planned sewer alignment crosses the Union Pacific railroad tracks near the intersection of Monterey Highway and Las Animas Avenue. Assorted chemicals historically were commonly used for dust suppression and weed control along rail lines. Common contaminants along railroad lines include metals, petroleum hydrocarbons, pesticides and polycyclic aromatic hydrocarbons (PAHs).
- Based on the information obtained during this study, no hazardous material spill incidents have been reported in the Site vicinity that would be likely to significantly impact soil or ground water quality at the Site. However, as is typical to many developed areas, several facilities in the vicinity were reported as hazardous materials users. Additionally, several spill incidents, such as leaking underground storage tank (LUST) cases, were reported near the planned sewer alignment that were listed as closed cases; thus, suggesting that the potential for significant adverse impacts is low. As with any earthwork project, there is a potential that unexpected or previously unreported contamination could be encountered during construction activities.
- We recommend preparing a Site Management Plan (SMP) and Health and Safety Plan (HSP) for the proposed sewer construction activities. The purpose of these documents would be to establish appropriate management practices for handling impacted soil and/or ground water that may be encountered during construction activities. If the construction activities will require off-Site disposal of excess soil, the excess soil should be sampled and analyzed to establish appropriate disposal options. Similarly, if ground water dewatering is to be conducted, the extracted ground water should be sampled and analyzed to establish appropriate disposal options.

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## Limitations

Cornerstone Earth Group, Inc. performed this study to support DJPA in evaluating the general environmental setting of the planned Morgan Hill Relief Sewer Trunk Line. This letter, an instrument of professional service, was prepared for the sole use of DJPA and may not be reproduced or distributed without written authorization from Cornerstone. Cornerstone makes no warranty, expressed or implied, except that our services have been performed in accordance with the environmental principles generally accepted at this time and location.

**Close**

We thank you for this opportunity to work with you on this important project. Should you have any questions, please contact us at your convenience.

Sincerely,

**Cornerstone Earth Group, Inc.**



Stason I. Foster, P.E.  
Senior Project Engineer



Kurt M. Soenen, P.E.  
Principal Engineer

Attachments:      Figure 1 – Site Plan  
                             Appendix A - Aerial Photographs and Agency Database Report

**APPENDIX A: AERIAL PHOTOGRAPHS AND AGENCY DATABASE REPORT**