

Addendum to the
July 2019 Mitigated Negative Declaration
Brownell Middle School Modernization Project

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A: Revised Project CalEEMod Results



1 Introduction and Purpose

The Gilroy Unified School District (District) is the lead agency consistent with the California Environmental Quality Act (CEQA) (Public Resources Code sections 21000 et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, §§ 15000, et seq.) for preparation of this Addendum to the Brownell Middle School Modernization Project Final Mitigated Negative Declaration (Addendum). The 2019 Mitigated Negative Declaration (MND) evaluated the potential environmental effects of the Brownell Middle School Modernization Project and was adopted by the Gilroy Unified School District Board of Education on August 8, 2019. The Brownell Middle School Modernization Project MND and this Addendum are available at the District Office located at 210 Swanston Lane, Gilroy, CA 95020 and on the District's website at <https://www.gilroyunified.org/>. This Addendum incorporates revisions to the Brownell Middle School Modernization project description and requisite environmental analysis. The revision incorporates a change in the previously approved project to include the cleanup and haul away associated with the proposed remediation action of the project site.

The purpose of the Addendum is to make additional changes to the adopted MND necessary to complete environmental documentation related to the project revisions pursuant to Public Resources Code sections 21000 et seq., inclusive of the CEQA Guidelines.

Section 15164(b) of the CEQA Guidelines states that,

“An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling of the preparation of a subsequent EIR or negative declaration have occurred.”

An addendum does not need to be circulated for public review but can be included in or attached to the final Environmental Impact Report (EIR) or adopted Negative Declaration prior to deciding on the project.

This Addendum describes the proposed revisions to the adopted Brownell Middle School Modernization Project MND. For each proposed revision in the Addendum, an explanation supports the findings that these revisions to the project will not result in a substantial change as described in the CEQA Guidelines Section 15162(a) which requires that when an EIR has been certified or a Negative Declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project that require major revisions of the previous EIR or Negative Declaration due to involvement of new significant environmental effects or a substantial increase in severity of previously identified significant effects;
2. Substantial changes have occurred with respect to circumstances under which the project is undertaken that will require major revisions of the previous EIR or Negative Declaration due to involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; and,
3. New information of substantial importance, which was not known and could not have been known with exercise of reasonable diligence at the time the previous EIR or Negative Declaration was adopted, shows any of the following:



- A. That the project will have one or more significant effects not discussed in the previous Negative Declaration;
- B. Significant effects previously examined will be substantially more severe than identified in the previous EIR;
- C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternative; or
- D. Mitigation Measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Therefore, this Addendum analyzes the revised project as required by the CEQA Guidelines, Sections 15162 and 15164. As set forth in this Addendum, the proposed changes to the Project are minor and none of the conditions described above 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. This document describes the impacts associated with the project site cleanup and haul away.

It should be noted that the Mitigation Monitoring and Reporting Program (MMRP) published with the 2019 Brownell Middle School Modernization Project inadvertently omitted mitigation measures or referenced the incorrect numbers associated with the mitigation measures. For example, MM 2 City of Gilroy Tree Removal Permit was omitted from the published MMRP but was referenced in the text of the 2019 Brownell Middle School Modernization Project, and MM 14 Tribal Monitoring was omitted from the published MMRP but was referenced as MM 13 in the text of the 2019 Brownell Middle School Modernization Project. The published MMRP also included the Cultural Resources mitigation measures as MM 2 through MM 6; however, these measures should have been listed as MM 3 through MM 7. The measures listed as MMs 9 through 18 in the published MMRP had been consolidated into MM 10 Hazardous Materials, as documented in the text of the 2019 Brownell Middle School Modernization Project; however, the published MMRP inaccurately listed the individual measures. The changes to the MMRP are not in response to new impacts of greater severity nor does the MMRP in Appendix B identify mitigation measures not previously circulated for public review. The MMRP has been updated for accuracy only and is included as Appendix B to this Addendum.

2 Project Description

The existing Brownell Middle School campus is owned by the District and consists of approximately 17.5 acres; further identified by Assessor's Parcel Numbers (APN) 799-20-015 and 799-20-013. The site consists of several single-story buildings that will be reconfigured into a new campus for the existing middle school. New construction will include the addition of a new staff parking lot north end with 64 stalls, staff and visitor parking lot west end with 25 stalls, school signage, and a new marquee sign. Buildings to be demolished include six classroom buildings, thirteen portables, the library, the food service/kitchen facility, and one greenhouse. A



total of 37 classrooms will be demolished and replaced; however, the classroom count and enrollment will remain the same.

Since the adoption of the 2019 MND, the project has been amended to include the cleanup of the site to remove potentially hazardous materials. Site cleanup and haul away 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. This 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 2019 MND.

3 CEQA Addendum Environmental Analysis

This Addendum addresses the revised project's effects related to the environmental topics and mitigation measures addressed in the 2019 Brownell Middle School Modernization Project MND. The baseline for review is the adopted MND impacts and mitigation as described in the adopted MND.

4 Determining Significance

The criteria for determining the significance of environmental impacts in this Addendum are the same as those contained in the 2019 Brownell Middle School Modernization Project MND. While the criteria for determining significant impacts are unique to each issue area, the analysis applies a uniform classification of the impacts based on the following definitions:

The explanation of each environmental issue should identify:

- a. The significance criteria or threshold, if any, used to evaluate each question; and
- b. The mitigation measure identified, if any, to reduce the impact to less than significant.

The Initial Study uses a checklist format consistent with the CEQA Guidelines that contains questions concerning potential changes to the environment that may result if this project is implemented. The following terminology is used to describe the potential level of significance of impacts:

- **Significant:** Known substantial environmental impacts. Further review needed to determine if there are feasible mitigation measures and/or alternatives to reduce the impact.
- **Potentially Significant, Unknown:** Potentially significant impacts that need further review to determine significance level and whether mitigable.
- **Potentially Significant, Mitigable:** Potentially significant impacts that can be avoided or reduced to less-than-significant levels with identified mitigation measures agreed-to by the applicant.
- **Less than Significant:** Impacts that are not substantial or significant.
- **Beneficial Impact:** Impacts would improve environmental conditions.
- **No Impact:** Project would not cause any impact.



4.1 Environmental Impact Analysis

Pursuant to CEQA, an addendum is the appropriate environmental document for analyzing a project revision if only minor technical changes or additions to the analysis are necessary or none of the conditions calling for the preparation of a subsequent EIR or Negative Declaration have occurred. From an environmental perspective, the Lead Agency must demonstrate the following with respect to that revised project:

- That the revised project will not have one or more significant effects not discussed in the previous MND;
- That the revised project would not create effects that result in an increase of the severity of significant effects already identified in the previous MND;
- That all feasible mitigation measures are accepted and adopted; and
- That no additional mitigation measures are required to reduce one or more significant effect or, if these are required, that they are imposed as part of the environmental assessment.

This Addendum is an environmental analysis for the revised project described in Section 2.0 Project Description.



5 Potential Environmental Impacts of the Revised Project

This section addresses each of the environmental issues discussed in the 2019 Brownell Middle School Modernization Project MND Environmental Checklist to determine whether or not the revised project has the potential to create new significant impacts or a substantial increase in the significance of a significant impact as compared to what was identified in the 2019 Brownell Middle School Modernization Project MND, within the framework of CEQA Guidelines Sections 15162 and 15164.

5.1 AESTHETICS

5.1.1 Aesthetics

Issues associated with visual aesthetics examined in the 2019 Brownell Middle School Modernization Project MND include the potential blockage of important public scenic views, project on-site visual aesthetics, compatibility with the surrounding area, and changes in exterior lighting.

Overall implementation of the project would have a less-than-significant impact on aesthetics in the area.

Impacts Analysis

The revised project (site cleanup and haul away) will not affect a scenic vista, will not affect scenic resources within a designated or scenic highway, will not substantially degrade the existing visual character, nor will the revised project introduce a new source of light or glare.

The revised project would involve site cleanup and haul away activities and would not alter the aesthetics of the proposed structures evaluated in the 2019 Brownell Middle School Modernization Project MND. The revised project involves the cleanup of the project site and would temporarily introduce construction equipment on the project site. The proposed site cleanup would temporarily introduce construction equipment similar to the construction phase of the project evaluated in the 2019 Brownell Middle School Modernization Project MND. The revised project would not modify the design, layout, or aesthetic of the proposed structures. Therefore, similar to the project, the revised project will not result in any new significant aesthetics resources impacts requiring mitigation.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.2 Agriculture and Forest Resources

The revised project would not alter the 2019 Brownell Middle School Modernization Project MND findings that no agricultural or forestry land is present within or in the vicinity of the project site and that the project would have no impact to agricultural and forestry resources.



No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.3 Air Quality

The 2019 Brownell Middle School Modernization Project MND indicated that the project is located within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). Based on the CalEEMod analysis that was performed for the 2019 Brownell Middle School Modernization Project MND, construction activities and operational activities associated with the project would not exceed the BAAQMD's thresholds of significance, as shown in Table 1.

Table 1. CalEEMod Results and BAAQMD Thresholds				
Construction				
	ROG (lbs/day)	NO_x (lbs/day)	PM₁₀ (lbs/day)	PM_{2.5} (lbs/day)
Construction Threshold	54.0	54.0	82.0	54.0
Project Construction Impacts	1.3	6.9	0.7	0.4
Operation				
	ROG (tpy)	NO_x (tpy)	PM₁₀ (tpy)	PM_{2.5} (tpy)
Operational Threshold	10.00	10.00	15.00	10.00
Project Operation Impacts	0.17	0.32	0.19	0.05

Source: Appendix D of the 2019 Brownell Middle School Modernization Project MND, 2019

Overall implementation of the project would have a less-than-significant impact on air quality issues in the area.

Impacts Analysis

Construction-related activities associated with the revised project (site cleanup and haul away) would result in similar air quality emissions when compared to the original project. As shown in Table 2, construction-related emissions, when combined with the project evaluated in the 2019 Brownell Middle School Modernization Project MND, would not result in exceedances of the BAAQMD emissions thresholds and would be less than significant.

Fugitive dust emissions (PM₁₀ and PM_{2.5}) associated with the revised project would be reduced through implementation of measures identified in Section 7.6 of the Removal Action Workplan. Measures include but are not limited to monitoring dust levels, watering equipment and the project site, as needed, monitoring meteorological conditions and covering stockpiles as necessary, and the use of perimeter fencing to suppress dust migration offsite. Watering the exposed areas was assumed a part of the revised project and was included in the assumptions for the CalEEMod run for the revised project.

Table 2. Revised Project CalEEMod Results and BAAQMD Thresholds				
Construction				
	ROG (lbs/day)	NO_x (lbs/day)	PM₁₀ (lbs/day)	PM_{2.5} (lbs/day)
Construction Threshold	54.0	54.0	82.0	54.0
Revised Project Construction Impacts	1.1	13.5	1.7	0.6



Combined Construction Impacts (Project + Revised Project)	2.4	20.4	2.4	1.0
Significant?	No	No	No	No

Source: Appendix A of this Addendum, 2019

The revised project would not alter operation-related air quality emissions; therefore, the analysis in the 2019 Brownell Middle School Modernization Project MND for operation-related air quality impacts would apply to the revised project.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.4 Biological Resources

The project site is located within the Santa Clara Valley Habitat Conservation Plan area; however, based on discussions with Santa Clara Valley Habitat Agency staff, the project will not result in any impacts to biological resources and is therefore not subject to the Habitat Conservation Plan. The 2019 Brownell Middle School Modernization Project MND does, however, identify the need for MM-1 to reduce potential impacts to avian species protected by the Migratory Bird Treaty Act (MBTA) by requiring the Gilroy Unified School District (GUSD) to schedule tree removal and construction activities to occur prior to the beginning of nesting activity or after fledging, or take other actions if project activities occur during the nesting season.

Additionally, the 2019 Brownell Middle School Modernization Project MND identified that 32 trees, 10 of which are protected trees, would be removed in association with the project. Mitigation measure MM-2 was identified to ensure the proposed project complies with the City of Gilroy’s tree removal requirements by requiring the GUSD to apply for a Tree Removal Permit.

Impacts Analysis

The revised project (site cleanup and haul away) would result in similar impacts to those evaluated in the 2019 Brownell Middle School Modernization Project MND. MM-1 and MM-2 would apply to the revised project which requires the GUSD to schedule tree removal and construction activities to occur prior to the beginning of nesting activity or after fledging, or take other actions if activities occur during the nesting season; and to apply for a Tree Removal Permit. The revised project would not result in impacts not previously evaluated in the 2019 Brownell Middle School Modernization Project MND.

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the 2019 Brownell Middle School Modernization Project MND would reduce impacts to biological resources within the project area to a less-than-significant level. No new mitigation measures would be required.

5.1.5 Cultural Resources

The 2019 Brownell Middle School Modernization Project MND describes the cultural resources setting based on prehistoric and historic archaeological resources and historic structure



information in and adjacent to the project site. No historical cultural resources would be impacted by the project. Overall implementation of the project would have a less-than-significant impact on cultural resources with implementation of MM-3, MM-4, MM-5, MM-6, and MM-7. MM-3 requires that if archaeological resources or human remains are found during construction activities that work within 50 feet of the find shall cease until it can be evaluated and appropriately treated, if significant. MM-4 requires construction personnel to be trained on the soil indicators that may indicate the presence of archaeological site deposits. MM-5 requires that if an archaeological resource is discovered during construction activities that work within 50 feet of the find shall cease until it can be evaluated by a qualified archaeologist and recovered. MM-6 requires that if a paleontological resource is discovered during construction activities that work within 50 feet of the find shall cease until it can be evaluated by a qualified paleontologist and evaluated/documented. MM-7 identifies the procedures in the event that human remains are discovered during ground disturbance activities.

Impacts Analysis

The revised project is located within the study boundary for the original project and its location was evaluated in the 2019 Brownell Middle School Modernization Project MND. Because the footprint for the revised project is consistent with the 2019 Brownell Middle School Modernization Project, the analysis presented in the cultural resources section of the 2019 Brownell Middle School Modernization Project MND covers cultural resources that could potentially be impacted by the revised project. The mitigation measures (MM-3 through MM-7) identified in the 2019 Brownell Middle School Modernization Project MND would reduce temporary and permanent impacts to cultural resources due to project (original or revised) implementation. The revised project would continue to result in no impacts to historical cultural resources.

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the 2019 Brownell Middle School Modernization Project MND would reduce impacts to cultural resources within the project area to a less-than-significant level. No new mitigation measures would be required.

5.1.6 Energy Conservation

As discussed in the 2019 Brownell Middle School Modernization Project MND, the project would comply with all Title 24 requirements. Title 24 is a collection of energy standards that addresses energy efficiency of new (and altered) homes and commercial and school buildings. Since 1978, California residents have been required to meet the energy efficiency standards contained in Title 24, Part 6 of the California Code of Regulations. Energy efficiency reduces energy costs, increases reliability and availability of electricity, improves building occupant comfort, and reduces impacts to the environment. The project includes occupancy sensors for interior convenience power outlets, LED lighting, and high efficiency HVAC units throughout the site. Completion of the project is estimated to surpass Title 24 requirements by 20-30 percent.

Impacts Analysis



The revised project (site cleanup and haul away) would not modify the design, layout, or energy efficiency of the proposed project; therefore, the revised project would not result in impacts not previously documented in the 2019 Brownell Middle School Modernization Project MND. Energy impacts associated with the revised project would be less than significant.

No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the revised project.

5.1.7 Geology and Soils

The geology and soils analysis in the 2019 Brownell Middle School Modernization Project MND is based on the analysis in the Geotechnical Engineering Study and Geologic Hazards Evaluation, prepared by Earth Systems Pacific. The 2019 Brownell Middle School Modernization Project MND addressed potential geophysical impacts which involve geologic and soil conditions and their potential to create physical hazards affecting persons or property; or substantial changes to the physical condition of the site. Included are earthquake-related conditions such as fault rupture, ground shaking, liquefaction (a condition in which saturated soil loses shear strength during earthquake shaking); unstable soil or slope conditions, such as landslides, subsidence, expansive or compressible/collapsible soils; or erosion; and extensive grading or topographic changes.

Overall implementation of the project would have a less-than-significant impact on geology and soils issues in the area with the implementation of MM-8 (conformance with the 2016 California Building Code) and MM-9 (protection of paleontological resources). MM-9 requires that the contract specifications include language indicating that if a paleontological resource is discovered during construction activities that work within 50 feet of the find shall cease until it can be evaluated by a qualified paleontologist and evaluated/documentated.

Impacts Analysis

The 2019 Brownell Middle School Modernization Project MND found that the project is subject to potentially significant but mitigable impacts associated with seismic shaking. This analysis finds the same potentially significant impacts would be associated with the revised project. Implementation of MM-8, which identifies compliance with the 2016 California Building Code, and MM-9, which identifies measures to implement in the event that paleontological resources are discovered, will reduce the revised project related geology and soils impacts to less than significant.

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the 2019 Brownell Middle School Modernization Project MND would reduce impacts to geology and soils within the project area to a less-than-significant level. No new mitigation measures would be required.



5.1.8 Greenhouse Gas Emissions

As discussed in the 2019 Brownell Middle School Modernization Project MND, the City of Gilroy has not adopted specific strategies regarding greenhouse gases. The City follows California's Green Building Standards (CALGreen) which supports State goals for greenhouse gas reduction and building energy efficiency programs. The CALGreen Code promotes healthful indoor and outdoor air quality through mandatory building standards. CALGreen Codes include voluntary "reach" standards known as the Tiers, which offer model building code language for local governments. Cities and counties may adopt the Tiers or other progressive building standards as an amendment to the CALGreen Code.

The greenhouse gas emissions analysis in the 2019 Brownell Middle School Modernization Project MND is based on the results from the CalEEMod Greenhouse Gas Estimator that was modeled for the project. Construction activities associated with the 2019 Brownell Middle School Modernization Project would result in 165.431 metric tons per year (MT/year) of CO₂e. When considered over the 30-year life of the project, the total amortized construction emissions for the project would be 5.5 metric tons of CO₂e per year. As such, construction of the project would not generate GHG emissions that would have a significant impact on the environment and construction-related impacts would be less than significant.

As discussed in the 2019 Brownell Middle School Modernization Project MND, the BAAQMD analyzes carbon dioxide equivalent (CO₂e) levels for determining non-stationary sources operational-related impacts on the environment; the school is considered a non-stationary source since it will be a public facility. The threshold is set at 1,100 MT/year of CO₂e and the CalEEMod results identified that the school would generate a CO₂e level of 314.122 MT/year (annual construction and operation emissions). The emissions estimator did not identify any significant impacts associated with GHG and the construction and operation of the project.

Overall implementation of the project would have a less-than-significant impact on GHG emissions in the area.

Impacts Analysis

The revised project would involve the cleanup of the project site and haul away of materials. The revised project would require the operation of construction equipment listed in Section 2.0 of this Addendum¹, excavation activities, and haul away of approximately 360 cubic yards of excavated soils. A CalEEMod Greenhouse Gas Estimator was completed for the revised project, and the results can be found in Appendix A of this Addendum.

The total construction-related GHG emissions for the revised project were estimated at 20.3 MT/year of CO₂e. Construction emissions amortized over the assumed lifetime of the project (i.e., 30 years) would be 0.7 MT CO₂e per year. When combined with the GHG emissions documented in the 2019 Brownell Middle School Modernization Project, the school would

¹ Note that the analysis for the revised project assumes the use of two more excavators and one more dumper/tender than the analysis in the 2019 Brownell Middle School Modernization Project MND.



generate a CO₂e level of 314.822 MT/year (annual construction [project + revised project] and operation emissions).

Operational GHG emissions associated with the revised project would not differ from the operational GHG emissions evaluated in the 2019 Brownell Middle School Modernization Project MND. The revised project would not result in impacts not previously evaluated in the 2019 Brownell Middle School Modernization Project MND.

No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the revised project.

5.1.9 Hazards and Hazardous Materials

The 2019 Brownell Middle School Modernization Project MND analyzed the potential for the project to create health or safety impacts from exposure of persons or the environment to hazardous materials or risk of accidents involving combustible or toxic substances. The 2019 Brownell Middle School Modernization Project MND documented that elevated concentrations of arsenic, lead, organochlorine pesticides, and polychlorinated biphenyls (PCBs) were present in the project area soils. Arsenic remediation on the project site was completed in July 2019. The 2019 Brownell Middle School Modernization Project MND identified the need for a second phase of modernization (remediation) for pesticides, lead, and PCBs.

Overall implementation of the project would have a less-than-significant impact on hazards and hazardous materials in the area with implementation of MM-10, which requires compliance with federal, state, and local hazardous materials storage and handling laws and regulations.

Impacts Analysis

The revised project (site cleanup and haul away) would complete remediation activities on the project site. The revised project would remove any potential contaminants from the soils, which would result in a beneficial impact related to health and safety. The revised project would not result in impacts not previously evaluated in the 2019 Brownell Middle School Modernization Project MND, and the revised project would comply with MM-10.

No new or substantially more severe significant impacts would occur. The revised project would implement the mitigation measure identified in the 2019 Brownell Middle School Modernization Project MND thereby reducing impacts to hazards and hazardous materials within the project area to a less-than-significant level. No new mitigation measures would be required.

5.1.10 Hydrology and Water Quality

The 2019 Brownell Middle School Modernization Project MND provides a discussion and analysis of potential impacts to hydrology and water quality due to implementation of the project. The project would be designed to ensure that surface runoff and erosion would be minimized and no alteration of rivers and streams would occur.



The 2019 Brownell Middle School Modernization Project MND identified MM-11, which requires the preparation of a Stormwater Pollution Prevention Plan, and MM-12, which requires the development of an emergency evacuation plan.

Overall implementation of the project would have a less-than-significant impact on hydrology and water quality issues in the area with implementation of MM-11 and MM-12.

Impacts Analysis

The revised project (site cleanup and haul away) would result in similar hydrology and water quality impacts as the project evaluated in the 2019 Brownell Middle School Modernization Project MND. The revised project would involve excavation, similar to the construction activities evaluated in the 2019 Brownell Middle School Modernization Project MND. The revised project would not result in impacts not previously evaluated in the 2019 Brownell Middle School Modernization Project MND.

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the 2019 Brownell Middle School Modernization Project MND would reduce impacts to hydrology and water quality within the project area to a less-than-significant level. No new mitigation measures would be required.

5.1.11 Land Use and Planning

The 2019 Brownell Middle School Modernization Project MND assessed land use compatibility and concluded the project would not create any physical barriers that would divide the community. As such, no impact would occur. Based upon the 2019 Brownell Middle School Modernization Project MND land use and planning analysis and lack of conflict with applicable land use plans, policies, and regulations, the proposed project would result in a less-than-significant impact related to conflicts with land use plans and policies. As discussed in Section 5.1.4 of this Addendum, the project site is located within the Santa Clara Valley Habitat Conservation Plan area; however, based on discussions with Santa Clara Valley Habitat Agency staff, the project will not result in any impacts to biological resources and is therefore not subject to the Habitat Conservation Plan.

Impacts Analysis

The revised project (site cleanup and haul away) would result in similar land use and planning impacts as the project evaluated in the 2019 Brownell Middle School Modernization Project MND. The revised project would not result in impacts not previously evaluated in the 2019 Brownell Middle School Modernization Project MND. The revised project's potential for an environmental impact resulting from an inconsistency with applicable land use plans and policies is less than significant.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.



5.1.12 Mineral Resources

The 2019 Brownell Middle School Modernization Project MND determined that the project site is not located in an area historically used for mineral resource extraction or as a mineral resource recovery site. The 2019 Brownell Middle School Modernization Project MND found that no direct impacts to mineral resources would occur due to the project.

Impacts Analysis

The revised project (site cleanup and haul away) would not result in mineral resources impacts, consistent with the analysis in the 2019 Brownell Middle School Modernization Project MND. The revised project would not result in impacts not previously evaluated in the 2019 Brownell Middle School Modernization Project MND.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.13 Noise

The 2019 Brownell Middle School Modernization Project MND determined that operational noise impacts associated with the project would be less than significant; however, construction-related noise and vibration impacts would be significant before the implementation of mitigation measures. The 2019 Brownell Middle School Modernization Project MND identified MM-13, which requires compliance with the City of Gilroy noise ordinance and proposed maintenance of construction equipment to minimize construction-related noise impacts.

Overall implementation of the project would have a less-than-significant noise impact during construction with implementation of MM-13.

Impacts Analysis

The revised project (site cleanup and haul away) would require the operation of construction equipment associated with excavation of the project site and operation of haul-away trucks, and MM-13 would apply to the revised project. The revised project would not result in new operational noise impacts. The revised project would result in similar noise impacts as the project evaluated in the 2019 Brownell Middle School Modernization Project MND and would not result in impacts not previously evaluated in the 2019 Brownell Middle School Modernization Project MND.

No new or substantially more severe significant impacts would occur. Implementation of a mitigation measure identified in the 2019 Brownell Middle School Modernization Project MND would reduce impacts to noise within the project area to a less-than-significant level. No new mitigation measures would be required.



5.1.14 Population and Housing

The 2019 Brownell Middle School Modernization Project MND determined that the project would not be growth-inducing as the project involves a modernization of the existing school. No impacts to population or housing were identified in the 2019 Brownell Middle School Modernization Project MND.

Impacts Analysis

Like the 2019 Brownell Middle School Modernization Project, the revised project (site cleanup and haul away) would not be growth-inducing and would not result in impacts to population or housing. The revised project would not result in impacts not previously evaluated in the 2019 Brownell Middle School Modernization Project MND.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.15 Public Services

The 2019 Brownell Middle School Modernization Project MND evaluated the project's effects on fire and police protection services, schools, road maintenance and other governmental services. The 2019 Brownell Middle School Modernization Project MND determined that the project would not result in the need for new or altered public service facilities and/or additional staffing to service the project.

Impacts Analysis

Similar to the 2019 Brownell Middle School Modernization Project, the revised project (site cleanup and haul away) would not result in any impacts on local public services such as fire protection, police protection, schools, or other public facilities.

No new or substantially more severe significant impacts would occur and no additional mitigation measures would be required.

5.1.16 Recreation

The 2019 Brownell Middle School Modernization Project MND analysis determined that the project would not increase the use of recreational facilities, nor include or require construction or expansion of recreational facilities that will result in an adverse effect on the environmental.

Impacts Analysis

Like the 2019 Brownell Middle School Modernization Project, the revised project (site cleanup and haul away) would result in no change related to demand for recreational facilities. The revised project would not result in impacts not previously evaluated in the 2019 Brownell Middle School Modernization Project MND.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.



5.1.17 Transportation/Traffic

The 2019 Brownell Middle School Modernization Project MND determined that transportation-related impacts would be less than significant. The project would provide more on-site loading space for student pick-up and drop-off than the existing Brownell Middle School site with no change in school capacity; therefore, on-site loading space is expected to be sufficient.

Overall implementation of the project would have a less-than-significant impact on transportation issues in the area.

Impacts Analysis

The revised project (site cleanup and haul away) would introduce construction equipment, worker vehicles, and haul trucks during the remediation action. Activities evaluated in the CalEEMod run for the revised project include excavation and off-site disposal/haul away of 360 cubic yards of impacted soil, 45 truck loads for transporting excavated soils (each trip a distance of 50 miles round trip), and 20 days of soil removal and haul away. Operation of construction equipment, worker vehicles, and haul trucks would be temporary and would not permanently impact the intersection and road segment operation. The revised project would not result in impacts not previously evaluated in the 2019 Brownell Middle School Modernization Project MND.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.18 Tribal Cultural Resources

The 2019 Brownell Middle School Modernization Project MND identified MM-14² that requires the presence of a tribal monitor during soil-moving activities in the northern portion of the project site.

Potential project-related impacts to undocumented tribal cultural resources are reduced to less than significant by implementation of resource protective construction monitoring for potential discovery and handling of tribal cultural resources and treatment of remains in MM-14.

Impacts Analysis

The revised project (site cleanup and haul away) would occur within the previously evaluated project footprint and would not result in impacts not previously documented in the 2019 Brownell Middle School Modernization Project MND. MM-14 would apply to the revised project

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

² The 2019 Brownell Middle School Modernization Project MND inadvertently listed MM 14 as MM 13. It has been corrected in this Addendum.



5.1.19 Utilities and Service Systems

The 2019 Brownell Middle School Modernization Project MND indicated that adequate sewer, water, and electrical supplies are available to serve the project and that no expansion of existing facilities or construction of new facilities would be required.

Impacts Analysis

The revised project (site cleanup and haul away) would not result in impacts not previously evaluated in the 2019 Brownell Middle School Modernization Project MND.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.20 Wildfire

The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. The Fire Hazard Severity Zone Viewer indicates that Brownell Middle School is located within a local responsibility area and is neither very high, high, or moderate for fire hazard severity. Therefore, the project will have no impact to wildfires.

Impacts Analysis

The revised project (site cleanup and haul away) would not result in impacts not previously evaluated in the 2019 Brownell Middle School Modernization Project MND.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.21 Mandatory Findings of Significance

The 2019 Brownell Middle School Modernization Project MND indicated that the project did not have the potential to degrade the quality of the environment or reduce the habitat of fish or wildlife species or eliminate important examples of California history or prehistory with the implementation of MM-1 through MM-14. With the implementation of the mitigation measures, the project would result in a less-than-significant impact.

The 2019 Brownell Middle School Modernization Project MND also indicated that the impacts of the project were individually limited and not cumulatively considerable with the implementation of MM-1 through MM-14.

The 2019 Brownell Middle School Modernization Project MND indicated that the project with implementation of MM-1 through MM-14 will not cause substantial adverse effects on human beings.

Impacts Analysis

The revised project (site cleanup and haul away) would not result in impacts not previously evaluated in the 2019 Brownell Middle School Modernization Project MND.



No new or substantially more severe significant impacts would occur and no additional mitigation measures would be required.



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Appendix A

Revised Project CalEEMod Results

Brownell Middle School Modernization Project - Monterey County, Winter

**Brownell Middle School Modernization Project
Monterey County, Winter**

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Junior High School	0.00		17.50	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	3.6	Precipitation Freq (Days)	55
Climate Zone	4			Operational Year	2021
Utility Company					
CO2 Intensity (lb/MWhr)	0	CH4 Intensity (lb/MWhr)	0	N2O Intensity (lb/MWhr)	0

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Construction Phase - Excavation associated with site remediation only

Off-road Equipment - Estimated equipment list

Grading - Site is only 17.5 acres and assumes grading of entire site

Trips and VMT - Assumes hauling to John Smith Road Landfill

Construction Off-road Equipment Mitigation -

Brownell Middle School Modernization Project - Monterey County, Winter

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	300.00	0.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	30.00	20.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	10.00	0.00
tblConstructionPhase	PhaseEndDate	7/16/2021	6/18/2021
tblConstructionPhase	PhaseEndDate	5/21/2021	3/27/2020
tblConstructionPhase	PhaseEndDate	1/31/2020	1/5/2020
tblConstructionPhase	PhaseEndDate	3/27/2020	3/13/2020
tblConstructionPhase	PhaseEndDate	6/18/2021	5/21/2021
tblConstructionPhase	PhaseEndDate	2/14/2020	1/31/2020
tblGrading	AcresOfGrading	10.00	17.50
tblGrading	MaterialExported	0.00	360.00
tblOffRoadEquipment	HorsePower	16.00	367.00
tblOffRoadEquipment	LoadFactor	0.38	0.48
tblOffRoadEquipment	OffRoadEquipmentType	Scrapers	Dumpers/Tenders
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	UsageHours	8.00	6.00
tblTripsAndVMT	HaulingTripLength	20.00	50.00
tblTripsAndVMT	WorkerTripNumber	15.00	0.00
tblTripsAndVMT	WorkerTripNumber	18.00	0.00
tblTripsAndVMT	WorkerTripNumber	15.00	0.00

Brownell Middle School Modernization Project - Monterey County, Winter

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	1.1556	13.4727	9.7859	0.0227	1.1366	4.9732	1.6545	0.1560	4.6138	0.6326	0.0000	2,239.7172	2,239.7172	0.5650	0.0000	2,253.8416
2021	0.0000	0.0000	0.0000	0.0000	0.0000	0.7718	0.0000	0.0000	0.7176	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	1.1556	13.4727	9.7859	0.0227	1.1366	4.9732	1.6545	0.1560	4.6138	0.6326	0.0000	2,239.7172	2,239.7172	0.5650	0.0000	2,253.8416

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	1.1556	13.4727	9.7859	0.0227	0.6242	4.9732	1.1420	0.1005	4.6138	0.5772	0.0000	2,239.7172	2,239.7172	0.5650	0.0000	2,253.8416
2021	0.0000	0.0000	0.0000	0.0000	0.0000	0.7718	0.0000	0.0000	0.7176	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Maximum	1.1556	13.4727	9.7859	0.0227	0.6242	4.9732	1.1420	0.1005	4.6138	0.5772	0.0000	2,239.7172	2,239.7172	0.5650	0.0000	2,253.8416

Brownell Middle School Modernization Project - Monterey County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	45.09	0.00	30.98	35.54	0.00	8.76	0.00	0.00	0.00	0.00	0.00	0.00

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Brownell Middle School Modernization Project - Monterey County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/6/2020	1/5/2020	5	0	
2	Site Preparation	Site Preparation	2/1/2020	1/31/2020	5	0	
3	Grading	Grading	2/15/2020	3/13/2020	5	20	
4	Building Construction	Building Construction	3/28/2020	3/27/2020	5	0	
5	Paving	Paving	5/22/2021	5/21/2021	5	0	
6	Architectural Coating	Architectural Coating	6/19/2021	6/18/2021	5	0	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 17.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Brownell Middle School Modernization Project - Monterey County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Demolition	Excavators	3	8.00	158	0.38
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Excavators	2	6.00	158	0.38
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Paving	Pavers	2	8.00	130	0.42
Paving	Rollers	2	8.00	80	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Rubber Tired Dozers	0	8.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Grading	Graders	1	8.00	187	0.41
Grading	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Paving	Paving Equipment	2	8.00	132	0.36
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Grading	Dumpers/Tenders	1	6.00	367	0.48
Building Construction	Welders	1	8.00	46	0.45
Grading	Scrapers	0	8.00	367	0.48

Trips and VMT

Brownell Middle School Modernization Project - Monterey County, Winter

3.3 Site Preparation - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.9318	0.0000	0.9318	0.1008	0.0000	0.1008			0.0000			0.0000
Off-Road	1.0528	12.0496	8.9959	0.0175		0.5106	0.5106		0.4698	0.4698		1,693.6648	1,693.6648	0.5478		1,707.3590
Total	1.0528	12.0496	8.9959	0.0175	0.9318	0.5106	1.4424	0.1008	0.4698	0.5706		1,693.6648	1,693.6648	0.5478		1,707.3590

Brownell Middle School Modernization Project - Monterey County, Winter

3.4 Grading - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0403	1.3649	0.2985	4.1400e-003	0.0981	6.3000e-003	0.1044	0.0269	6.0300e-003	0.0329		438.3694	438.3694	0.0125		438.6826
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0625	0.0582	0.4915	1.0800e-003	0.1068	9.2000e-004	0.1077	0.0283	8.5000e-004	0.0292		107.6830	107.6830	4.6800e-003		107.8000
Total	0.1028	1.4231	0.7900	5.2200e-003	0.2048	7.2200e-003	0.2121	0.0552	6.8800e-003	0.0621		546.0524	546.0524	0.0172		546.4826

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.4193	0.0000	0.4193	0.0454	0.0000	0.0454			0.0000			0.0000
Off-Road	1.0528	12.0496	8.9959	0.0175		0.5106	0.5106		0.4698	0.4698	0.0000	1,693.6648	1,693.6648	0.5478		1,707.3590
Total	1.0528	12.0496	8.9959	0.0175	0.4193	0.5106	0.9300	0.0454	0.4698	0.5151	0.0000	1,693.6648	1,693.6648	0.5478		1,707.3590

Brownell Middle School Modernization Project - Monterey County, Winter

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Junior High School	0.538832	0.029687	0.203987	0.136286	0.023350	0.005751	0.018582	0.026631	0.004153	0.002845	0.007802	0.001241	0.000853

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Brownell Middle School Modernization Project - Monterey County, Winter

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Junior High School	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Junior High School	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

Brownell Middle School Modernization Project - Monterey County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

Brownell Middle School Modernization Project - Monterey County, Winter

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Brownell Middle School Modernization Project - Monterey County, Winter

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	------------	-------------	-------------	-----------

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

User Defined Equipment

Equipment Type	Number
----------------	--------

11.0 Vegetation

Appendix B

Mitigation Monitoring Reporting Program



**Gilroy Unified School District (GUSD)
Mitigation Monitoring Reporting Program (MMRP)**

Environmental Factors Potentially Affected	Mitigation Measure	Responsible Party	Timeline for Implementation
<p>Migratory Bird Treaty Act</p>	<p>MM 1) <i>Migratory Bird Treaty Act</i> Tree removal and construction activities shall be scheduled to commence prior to the beginning of nesting activity (March 1) or after fledging (August 15). If this is infeasible, the District shall retain a biologist to conduct pre-construction surveys between March 1 and August 15 in potential nesting habitat to identify nest sites. Surveys should be conducted within one week of tree removal and the start of construction to identify active nests prior to the initiation of construction activities. If an active raptor nest is observed within 350 feet of the Project Site, the District shall contact California Department of Fish and Wildlife (CDFW) for guidance and/or establish a 350-foot buffer around the nest tree. If a passerine bird nest is observed within 100 feet of the Project Site, the District shall contact CDFW for guidance and/or establish a 100-foot buffer around the nest tree. If construction activities cannot be prohibited within the established buffers until young have fledged, District consultation with CDFW shall be conducted for a reduced buffer zone based on nesting phenology, site conditions, and recommendation(s) of a biological monitor. The District shall prohibit construction activities in the buffer zone until the young have fledged.</p>	<p align="center">District appointed Construction Superintendent</p>	<p align="center">Prior to construction if tree removal to occur during nesting season</p>
<p>City of Gilroy Tree Removal Permit</p>	<p>MM 2) <i>City of Gilroy Tree Removal Permit</i> The GUSD shall apply for a Tree Removal Permit with the City of Gilroy Community Development Planning Division prior to removal of any Protected Trees. Protected Trees include indigenous trees that are both native to Gilroy region and are characterized by having a single trunk circumference of 38 inches or more at a point four- and one-half feet above the grade. Indigenous species include all species of Oaks, California Bay, Big Leaf Maple, Madrone, California Sycamore, California Buckeye, and Alder. According to the 2019 Arborist Report performed by Mighty Tree Movers, there are ten trees that shall be included in the application for tree permitting.</p>	<p align="center">District appointed Construction Superintendent</p>	<p align="center">Prior to tree removal</p>



Cultural Resources	<p>MM 3) <i>Archaeological Signage</i> In accordance with guidelines section §15064.5, the School District will ensure that the following language is included in all construction contracts and permits:</p> <p>“If archaeological resources or human remains are accidentally discovered during construction, work will be halted within 50 feet of the find until it can be evaluated by a qualified professional archaeologist. If the find is determined to be significant, appropriate mitigation measures will be formulated and implemented.”</p>	District appointed Construction Superintendent	Prior to any ground disturbing activities
Cultural Resources	<p>MM 4) <i>Communication of Archaeological Site Deposit Indicators</i> All construction personnel involved in site clearing, subsequent grading, and trenching will be informed of the potential for subsurface cultural resource unearthing. Indicators of archaeological site deposits include, but are not limited to the following: Soil that is darker than the surrounding soils, evidence of fire (ash, fire altered rock and earth, carbon flecks, concentrations of stone, bone and shellfish, artifacts of these materials and animal or human burials</p>	District appointed Construction Superintendent	Prior to any ground disturbing activities
Cultural Resources	<p>MM 5) <i>In the Event of Cultural Resources Discovered</i> If cultural resources are encountered during Site grading, or construction activities, all work shall be halted within 50 feet of the discovery and (GUSD) shall engage a qualified archaeologist to assess and protect the discovery as appropriate. No further soil disturbance shall occur within the 50-foot buffer until the preceding assessment has been completed and the resource has been recovered.</p>	District appointed Construction Superintendent	During site grading and construction activities
Cultural Resources	<p>MM 6) <i>Paleontological Construction Contracts and Permits Language</i> Due to the possibility that significant buried paleontological resources may be found during construction activities, the School District will ensure that the following language is included in all construction contracts and permits: “If paleontological resources are encountered during subsurface construction activities, all work within 50 feet of the discovery will be redirected until a qualified paleontologist can evaluate the finds and make recommendations. If the paleontological resources are found to be significant, they will be avoided by project construction activities and recovered by a qualified paleontologist. Upon completion of the recovery, a paleontological assessment will be conducted by a qualified paleontologist to determine if further monitoring for paleontological resources is required. The assessment will include:</p> <ol style="list-style-type: none"> 1) The results of any geotechnical investigation prepared for the project site; 2) Specific details of the construction plans for the project site; 3) Background research; and 	District appointed Construction Superintendent	Prior to any ground disturbing activities



	<p>4) Limited subsurface investigation within the project site.</p> <p>If a high potential to encounter paleontological resources is confirmed, a monitoring plan of further project subsurface construction will be prepared in conjunction with this assessment. After project subsurface construction has ended, a report documenting monitoring, methods, findings, and further recommendations regarding paleontological resources will be prepared.”</p>		
<p>Cultural Resources</p>	<p>MM 7) Policies and Procedures for Inadvertently Discovered Human Remains Because site disturbance may adversely impact undocumented human remains or unintentionally discover significant historic or archaeological materials, the following policies and procedures for treatment and disposition of inadvertently discovered human remains or archaeological materials will apply. If human remains are discovered, it is probable they are the remains of Native Americans.</p> <p>a) If human remains are encountered, they will be treated with dignity and respect as due to them. Discovery of Native American remains is a very sensitive issue and serious concern. Information about such a discovery will be held in confidence by all project personnel on a need to know basis. The rights of Native Americans to practice ceremonial observances on sites, in labs and around artifacts will be upheld.</p> <ul style="list-style-type: none"> • Remains should not be held by human hands. Surgical gloves should be worn if remains need to be handled. • Surgical mask should also be worn to prevent exposure to pathogens that may be associated with the remains. <p>b) In the event that known or suspected Native American remains are encountered, or significant historic or archaeological materials are discovered, ground-disturbing activities will be immediately stopped. Examples of significant historic or archaeological materials include, but are not limited to, concentrations of historic artifacts (e.g., bottles, ceramics) or prehistoric artifacts (chipped chert or obsidian, arrow points, ground stone mortars and pestles), culturally altered ash-stained midden soils associated with pre-contact Native American habitation sites, concentrations of fire-altered rock and/or burned or charred organic materials, and historic structure remains such as stone-lined building foundations, wells or privy pits. Ground-disturbing project activities may continue in other areas that are outside the discovery locale.</p> <p>c) An “exclusion zone” where unauthorized equipment and personnel are not permitted will be established (e.g., taped off) around the discovery area plus a reasonable buffer</p>	<p>District appointed Construction Superintendent</p>	<p>During any ground disturbing activities</p>



<p>zone by the Contractor Foreman or authorized representative, or party who made the discovery and initiated these protocols, or if on-site at the time or discovery, by the Monitoring Archaeologist (typically 25-50ft for single burial or archaeological find).</p> <p>d) The discovery locale will be secured (e.g., 24 hour surveillance) as directed by the School District if considered prudent to avoid further disturbances.</p> <p>e) The Contractor, Foreman, authorized representative, or party who made the discovery and initiated these protocols will be responsible for immediately contacting by telephone the parties listed below to report the find and initiate the consultation process for treatment and disposition:</p> <ul style="list-style-type: none"> • The Gilroy Unified School District Director of Facilities Planning and Management (408) 842-5317 • The Contractor’s Point(s) of Contact • The Coroner of the County of Santa Clara (if human remains found) (408) 793-1900 • The Native American Heritage Commission (NAHC) in Sacramento (916) 373-3710 <p>f) The Coroner has two working days to examine the remains after being notified of the discovery. If the remains are Native American, the Coroner has 24 hours to notify the NAHC.</p> <p>g) The NAHC is responsible for identifying and immediately notifying the Most Likely Descendant (MLD). (Note: NAHC policy holds that the Native American Monitor will not be designated the MLD.)</p> <p>h) After notification by the NAHC, the MLD will be granted permission to inspect the discovery site if they so choose.</p> <p>i) After notification by the NAHC, the MLD may recommend to the Administrator of District Support Services the recommended means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD has 48 hours after accessing the Site to make recommendations to the property owner as specified in Public Resources Code section 5097.98 (a). The recommendation may include the scientific removal and nondestructive or destructive analysis of human remains and items associated with Native American burials.</p> <p>j) If the MLD recommendation is rejected by the School District the parties will attempt to mediate the disagreement with the NAHC. If mediation fails then the remains and all associated grave offerings will be reburied with appropriate dignity on the property in a location not subject to further subsurface disturbance.</p>		
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Geology and Soils	<p>MM 8) <i>Seismic Shaking</i> Structures built at the site should be designed for strong seismic shaking using the 2016 California Building Code and seismic design parameters as outlined in the Geotechnical Study; see Appendix F, Table 3.</p>	District appointed Construction Superintendent	Prior to the start of construction activities
Geology and Soils	<p>MM 9) <i>Paleontological Construction Contracts and Permits Language</i> Due to the possibility that significant buried paleontological resources may be found during construction activities, the School District will ensure that the following language is included in all construction contracts and permits:</p> <p>“If paleontological resources are encountered during subsurface construction activities, all work within 50 feet of the discovery will be redirected until a qualified paleontologist can evaluate the finds and make recommendations. If the paleontological resources are found to be significant, they will be avoided by project construction activities and recovered by a qualified paleontologist. Upon completion of the recovery, a paleontological assessment will be conducted by a qualified paleontologist to determine if further monitoring for paleontological resources is required. The assessment will include:</p> <ol style="list-style-type: none"> 1) The results of any geotechnical investigation prepared for the project site; 2) Specific details of the construction plans for the project site; 3) Background research; and 4) Limited subsurface investigation within the project site. <p>If a high potential to encounter paleontological resources is confirmed, a monitoring plan of further project subsurface construction will be prepared in conjunction with this assessment. After project subsurface construction has ended, a report documenting monitoring, methods, findings, and further recommendations regarding paleontological resources will be prepared.”</p>		
Hazards and Hazardous Material	<p>MM 10) <i>Hazardous Materials</i> All contractors will be responsible for operating in accordance with the most current requirements of Title 8, California Code of Regulations, Section 5192 (8 CCR 5192) and Title 29, Code of Federal Regulations, Section 1910.120 (29 CFR 1910.120), Standards for Hazardous Waste Operations and Emergency Response (HAZWOPER). On-site personnel are responsible for operating in accordance with all applicable regulations of</p>	District appointed contractors	Prior to and during SMP activities



	<p>the Occupational Safety and Health Administration (OSHA) outlined in 8 CCR General Industry and Construction Safety Orders and 29 CFR 1910 and 29 CFR 1926, Construction Industry Standards, as well as other applicable federal, state and local laws and regulations. All personnel shall operate in compliance with all California OSHA requirements.</p> <p>A site-specific health and safety plan (HSP) has been prepared for the Project Site in accordance with current health and safety standards as specified by the federal and California OSHAs. A copy of the HSP is included as Appendix B in the SMP.</p> <p>The soil management contractor will implement appropriate procedures to control the generation of airborne dusts during the course of the soil removal activities as outlined in the SMP.</p>		
Hydrology and Water Quality	<p>MM 11) Stormwater Pollution Prevention Plan The District shall obtain discharge authorization under an appropriate National Pollutant Discharge Elimination System (NPDES) and shall ensure implementation of a Stormwater Pollution Prevention Plan (SWPPP) to abide by water quality standards and waste discharge requirements.</p>	District appointed Civil Engineer or Architect and appointed Construction Superintendent	Prior to the start of construction and prior to occupancy of school
Hydrology and Water Quality	<p>MM 12) Emergency Evacuation Plan The Gilroy Unified School District shall include an emergency evacuation plan that addresses the potential for dam failure and specifies evacuation routes beyond flood zones. This may be incorporated into the SB 187 Comprehensive School Safety Plan. Additionally, the District shall coordinate with the Santa Clara County Community Dispatch Center and Gilroy Fire Department to ensure they are notified in case of an imminent dam failure or other natural disaster.</p>	District	Prior to Construction
Noise	<p>MM 13) Noise Control Noise-generating construction operations will be limited to Monday through Friday between the hours of 7am to 6pm. There shall be no start-up of machines or equipment before 6:30am, and there shall be no cleaning or servicing of machines or equipment past 6:30pm. Construction activities will be prohibited on Saturdays, Sundays and federal holidays. Construction equipment will be properly maintained and equipped with noise reduction intake and exhaust mufflers and engine shrouds, in accordance with</p>	District appointed Construction Superintendent	During Construction



	<p>manufacturers’ recommendations. Equipment engine shrouds will be closed during equipment operation. When not in use, motorized construction equipment will not be left idling. Trucks waiting in the on-site staging area to be loaded with soil for off-site transport, will not sit idling for more than five minutes. If idle time exceeds five minutes, drivers will immediately shut down the engine until it is ready to be loaded.</p>		
<p>Tribal Cultural Resources</p>	<p>MM 14) Tribal Monitoring The District shall consult with and hire a tribal for all earth moving activities to occur in the northern section of the Project Site. In the event that tribal cultural resources are found, the District would notify the Indian Canyon Nation in addition to the NAHC.</p>	<p>District appointed Construction Superintendent</p>	<p>Prior to and during construction activities</p>