McCloskey Consultants
ENVIRONMENTAL & GEOLOGIC ASSESSMENTS

July 15, 2016

Mr. Kevin Vo
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

RE: ADMP Addendum, Phase II Communication Hill, San Jose

Dear Mr. Vo,

McCloskey Consultants, Inc. (MCI) on behalf of KB Home South Bay has prepared this Asbestos Dust Monitoring Plan (ADMP) Addendum for the Phase II area of the Communication Hill 2 project (Site), as shown in Figure 1. The limit of Phase II grading and housing construction is shown on the attached Exhibit.

A full ADMP was previously prepared and approved by the Bay Area Air Quality Management District (BAAQMD) for the Phase I area dated February 27, 2015. The Phase I area has been mass graded and is under development with new residential units. This Addendum is meant to define the Phase II area, and to rely on the same means and methods for dust control described in the Phase I ADMP with modification to show where perimeter asbestos dust monitoring devices will be placed. Some adjustments to the locations are expected as construction and occupancy progresses in the Phase I area.

Phase II Description

The Phase II area is generally located northeast of the Phase I area, and the disturbed area will be approximately 125 acres in size and support a planned 648 residential units, infrastructure, and open space. Like the Phase I area of the Site, this area is largely underlain by serpentinite containing naturally-occurring asbestos (NOA).

The Phase II Site grading involves the excavation of up to 105 feet of bedrock in the topographically elevated portions of the Site, and placement of the removed bedrock to enlarge the buildable area of Phase II. The deepest area of planned cuts is in the southeast corner of Phase II. Like in the Phase I area, bedrock sampling has shown NOA concentrations (as chrysotile) that range from 11% to 30% using PLM lab methods.

Dust Mitigation Summary Description

The planned development at the Site could release asbestos fibers in the work area that could migrate to surrounding areas if proper mitigation measures are not employed. The Air Board's Asbestos Toxic Control Measure (ATCM) requires that dust mitigation measures be specified such that no visible dust crossing the property line is generated by any equipment or operation. There is also a perimeter monitoring fiber count that is used as a guideline to evaluate the effectiveness dust control measures. The Phase II grading and construction would follow the same means methods and procedures described in the Phase I ADMP to minimize the generation of asbestos containing dust with a few added adjustments. The dust mitigation measures described in the Phase I ADMP include the following:

- Track out prevention and control;
- Disturbed surfaces control measures;
- Traffic control;
- Control for earthmoving activities;
- Stockpile control measures, and;
- Post-construction stabilization of disturbed NOA.

Our experience with dust control during the Phase I portion of Site development found that emissions could be generally controlled during mass grading operations, but became more difficult during construction activities particularly with track on and track out from the various trade contractors involved.

In addition to the dust control measures described in the Phase I ADMP, exposed soil areas around buildings under construction may need to be capped with imported baserock or similar material to prevent equipment, e.g. carpenters boom lifts, from driving over soils with NOA and creating dust and track out. The import would not contain NOA exceeding the legal limit for NOA of 0.25% by PLM methods.

Another measure to be added to control dust emissions from subcontractors would be the addition of water buffalo(s) or water truck(s) stationed in areas performing earth-disturbing activities including utility and foundation trenching. It will be required that

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420 Sycamore Valley Road West, Danville, CA 94526 • Phone: (925) 786-2667 • tom@McCloskeyConsultants.com

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this equipment is operated appropriately and by any means necessary to adequately control dust emissions.

The street cleaning operations during the Phase I portion of the Site determined that conventional sweeping/vacuuming of the pavement was not adequate to control track out. To improve these efforts, if permission can be obtained from the City of San Jose Storm Water Compliance Unit, a water truck would be used in tandem with the street sweeper to loosen and remove accumulated sediment. This would be done with storm drain protection measures in place. Additional and larger street sweepers would be used if needed to control sediment accumulation and dust.

Air Monitoring

Perimeter asbestos fiber monitoring has been in place every day of grading and construction to date during the Phase I development. The means and methods for monitoring during Phase II will be the same as described in the Phase I ADMP. The locations of the perimeter monitors would be as shown in the attached exhibit. It is expected that Phase I construction activities will continue until August 2017, and therefore some of the perimeter locations used in Phase I will remain for Phase II until that time. The first residential units to be occupied is expected to be in August 2016 and take place on the southwest side of Phase I adjacent to Adeline Avenue and Manual Street. As this occurs existing perimeter monitor P2 will be moved northeast to be northwest of the newly occupied residences (upwind) and be positioned between Phase II grading and construction activities and the newly occupied residences. Similarly, existing monitoring station P4 will be moved when occupancy commences and be positioned upwind and between grading/construction and the new residences. These future anticipated locations are shown in the attached Exhibit.

On each day of dust monitoring, samples will be collected at one upwind and five locations around the perimeter of the Phase II area of the Site and submitted for laboratory analysis for asbestos fibers. The prevailing wind direction is northwest to southeast. The sampling locations will be within 100 feet of the locations shown and not moved further unless approved in advance by the BAAQMD.

The monitoring will also consist of visual observations of grading activities. If dust is observed leaving the Site, or asbestos fibers are detected leaving the Site (greater downwind concentrations than upwind concentrations), increased dust control measures will be implemented. During site grading activities if there are high winds and dust

control measures are not effective in preventing dust emissions crossing the property line, the operations would be suspended until conditions change, in accordance with ATCM guidelines.

Whenever the downwind perimeter samples identify fiber concentrations that could be excessive, increased dust control measures will be taken immediately, and if the problem persists, the BAAQMD project manager notified. Increased dust control measures could include increasing water application, decreasing driving speeds, chemical dust suppressants, or stopping work if excessive winds are present.

Recordkeeping and Reporting

A field technician trained in dust suppression measures and dust monitoring equipment will be present during the days of perimeter monitoring. Detailed field records will be kept on the days of perimeter monitoring that will include weather and wind conditions, work activities, sampling equipment locations, conversations with any grading or construction personnel, and the actions taken to control dust. The lab results of the perimeter monitoring will be compiled in a spreadsheet in units of total structures per cubic centimeter. The spreadsheet will be submitted electronically for BAAQMD review once every two weeks.

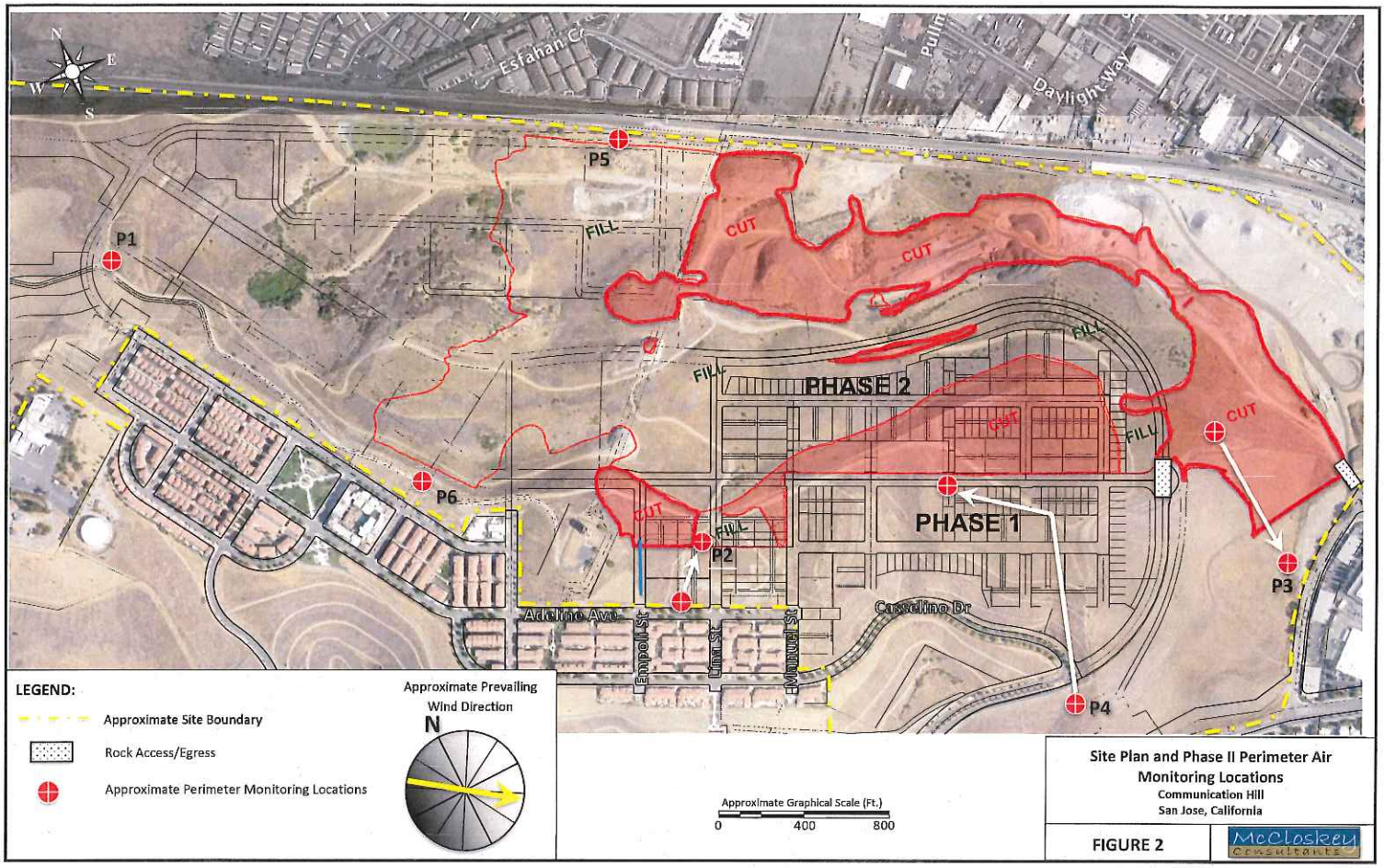
If you have any questions or concerns regarding this Addendum, please feel free to contact me at (925) 786-2667 or tom@mccloskeyconsultants.com.

Sincerely,

Thomas F. McCloskey, P.G., C.E.G., C.HG.
President and Principal Geologist

Attachments: Site Plan and Phase II Perimeter Air Monitoring Locations

Cc: Mr. Peter Lezak, KB Home



Site Plan and Phase II Perimeter Air Monitoring Locations
Communication Hill
San Jose, California

FIGURE 2

McCloskey Consultants